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Norwich to Tilbury

Volume 8: Examination Documents

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British Gliding Association - Clean Version

Final Issue C

July 2026

Planning Inspectorate Reference: EN020027

nationalgrid

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Revision History

Version	Date	Submitted at
A	12 May 2026	Deadline 4
B	10 June 2026	Deadline 5
C	21 July 2026	Deadline 7

British Gliding Association

Statement of Common Ground

1. Purpose of the Statement of Common Ground

This Statement of Common Ground (SoCG) has been prepared to confirm to the Examining Authority where agreement has been reached and where agreement has not been reached between National Grid and the British Gliding Association regarding potential aviation impacts in relation to the proposed Norwich to Tilbury Project.

This final signed version of the SoCG has been submitted at Examination Deadline 7.

2. Parties to the SoCG

This SoCG has been prepared by 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 Aviation Impact Assessment Methodology and Key Assumptions	The Stakeholder and the Applicant have shared information regarding their respective consideration of gliding-specific operational parameters. In-depth discussion and quantitative modelling has been jointly undertaken, resulting in the agreement of a number of key parameters as applicable to the majority of potential gliding operational scenarios. The Stakeholder remains concerned scenarios associated with low height, shallow glide angle approaches are not sufficiently addressed.	Resolved for key parameters/assumptions; Unlikely to fully resolve within examination period;
7.2 Proposed Project Alignment and Aviation Impact Conclusions	The Stakeholder and the Applicant agree there is an inherent increased risk to glider operations at Tibenham as a result of the presence of the Project as an obstacle in its vicinity. The Stakeholder is predominantly concerned with safety and utility impacts on the aerodrome presented by the risk of collision with pylons or cables and also the increased likelihood of a 'land out' (an off-aerodrome landing), if a glider is too low to overfly the line safely and land at Tibenham. The Stakeholder position is that the hazard	Partially resolved; unlikely to fully resolve within examination period; dependencies on Operator to confirm acceptability of the project alignment

SoCG ID	Summary of matter under discussion	Deadline for resolution
	imposed by the Project will require the gliding club to significantly modify or reduce its operation, to mitigate the risk associated with the Project. The Applicant position is gliding operations (including competitions) can continue safely with minimal, reasonable changes to current procedures considering this position to have been verified by modelling using parameters either agreed with the BGA or else based on conservative and evidenced reasoning. The Stakeholder does not agree that operational mitigations address the risk fully and considers that residual risk associated with the pylons and cables would remain.	
7.3 Mitigation Measures	The Stakeholder position is that overhead line realignment, height reduction or undergrounding could mitigate risks. In the absence of implementation of these hard mitigation measures, pilots will need to mitigate risks, including via changes to operational procedures and increased focus on decision-making with respect to flight close to the line. The Stakeholder views these mitigations as less effective than physical change to the obstacle characteristics. Notwithstanding their position specific to Tibenham aerodrome at 7.2, the Applicant position is that implementation of significant overhead line design changes requires justification through evidence that acceptable overhead line clearances cannot be achieved and that other mitigations are inadequate. In the case of Tibenham, the Applicant position is that alternative, reasonable mitigation options exist to address the risk and that these mitigations are adequate to maintain safe gliding operations.	Partially resolved in terms of agreement of potential for changes to operational procedures unlikely to fully resolve in examination period; dependencies on Operator engagement to consider and agree appropriate mitigation measures

4. Background

4.1 Description of the Project/Development

National Grid Electricity Transmission pic ('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:
 - o 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
 - o 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 (SoCG) and progression of technical matters regarding gliding impact assessment and mitigation, relating to Tibenham aerodrome [Operator invited to meeting but declined to attend], including:
 - o Aerotow take-offs
 - o Forced landings
 - o Approaches and competition finishes
 - 21 April email from National Grid to the BGA with proposed updates to SoCG following meeting discussions
 - 24 April email from the BGA to National Grid requesting changes to summary positions to ensure accurate representation of the BGA position
 - 1 and 2 May emails from National Grid to the BGA sharing updated version of SoCG to reflect requested changes and seeking clarity on gliding-specific operational parameters to progress impact assessment and mitigation consideration
 - 7 May email from the BGA providing detail on gliding-specific operational parameters
 - 11 May email from National Grid to the BGA regarding review of parameters and suggested response within next revised version of SoCG
 - 21 May email from National Grid to the BGA providing updated SoCG and proposing meeting to further discuss operational parameters

- 26 May emails between National Grid and the BGA regarding SoCG tracked changes and meeting proposals
- 1 June email from National Grid to the BGA providing updated SoCG and proposed meeting date
- 3 June emails between National Grid and the BGA regarding SOCG amendments and meeting dates
- 5 June email from National Grid proposing a trilateral meeting with Tibenham aerodrome operator
- 16 June emails between National Grid and the BGA regarding meeting arrangements
- 18 June meeting between the BGA and National Grid representation [Tibenham aerodrome operator invited to meeting but declined to attend] discussing:
 - Interpretation of minimum height regulations as applicable to glider approaches
 - Acceptable overhead line clearances to be achieved by design-based mitigation
 - Competition finish scenarios to enable safe overflight clearance of overhead line
- 19 June email from National Grid providing updated SoCG (Revision C) to reflect meeting discussions
- 22 June email from National Grid to the BGA providing draft modelling for discussion
- 29 June meeting between BGA, National Grid and Tibenham aerodrome operator to discuss:
 - Draft modelling based on BGA-derived parameters
 - Implications of modelling for impact assessment and mitigation consideration
- 6 July email from National Grid to the BGA sharing updated SoCG (Revision C.02) to reflect meeting discussions; response from the BGA with feedback regarding drafting and points for inclusion.
- 8 July email from National Grid to the BGA sharing updated SoCG (Revision C.03) for review.

6. Matters Agreed

In recognition of the BGA's remit, focus has been placed on establishing agreed positions regarding gliding-specific operational parameters to inform Applicant impact assessment methodology and operator risk acceptance and/or consideration of appropriate mitigation options.

ID	Issue	Agreement reached	Date agreed	Relevant documentation
6.1a	Operational parameter: Typical glide angles for approach and other phases of flight	National Grid accepts the range of glide angles provided by the BGA for various sailplane performances as detailed within Appendix A (7.1a)) as realistic and justified parameters.	18 June 2026	
6.1b	Operational parameter: Glider approach	The BGA and National Grid agree that a sailplane is on approach when on a descending flight profile towards the landing area with the landing area in sight. The approach profile is inclusive of manoeuvring as necessary to land. Manoeuvring as part of the approach profile is inclusive of standard circuit flying and competition finishes as normal aviation practices, if undertaken with the intention to land. This interpretation is in accordance with minimum height regulations and is consistent with the BGA and CAA agreed interpretation of January 2007, as reflected within BGA competition rules and described within Appendix A (7.1b)).	18 June 2026	Civil Aviation Authority (2024) UK Standardised Rules of the Air: Annex I - Rules of the Air, Section 3, Chapter 1 SERA.3105 Minimum heights; Civil Aviation Authority (2024) UK Standardised Rules of the Air: Annex I - Rules of the Air, Section 5 SERA.5005 Visual flight rules; UK Civil Aviation Authority (2021) Official Record Series 4, No. 1496: (UK) Standardised European Rules of the Air - Exceptions to the Minimum Height Requirements

1-3 Strand
London WC2N 5EH

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ID	Issue	Agreement reached	Date agreed	Relevant documentation
				British Gliding Association (2026) Rules for Rated Competitions
6.1c	Operational parameter: competition finishes	The Applicant and the BGA agree that the potential exists for the operator of Tibenham aerodrome as the host of gliding competitions to define finish lines or rings, to respond to the presence of the Project as an obstacle; this is within the existing scope of BGA competition rules; it is agreed that modelling outcomes suggest a line finish height of 10m (30ft) at the aerodrome boundary, with a minimum height 31m (100ft) crossing of the overhead line, would be achievable; for a 3km ring finish, it is agreed a minimum finish height of 137m (450ft) would be reasonable and consistent with finish heights at other competitions.	29 June 2026	
6.1d	Operational parameter: best practice/minimum heights of glider at aerodrome boundary on approach	The Applicant and the BGA agree with the general principle that aircraft should be at a height that cannot endanger persons (seen or unseen), vessels or property, in accordance with SERA.3101; for purposes of quantitative risk modelling it is agreed that a minimum 10m (30ft) above the aerodrome elevation when crossing the aerodrome boundary is an appropriate measure, recognising this figure is referenced in BGA competition rules in relation to line finishes at aerodrome boundaries.	29 June 2026	Civil Aviation Authority (2024) UK Standardised Rules of the Air: Annex I - Rules of the Air, Section 3, Chapter 1 SERA.3101 Negligent or reckless operation of aircraft

1-3 Strand
London WC2N 5EH

T: +44 (0)20 7004 3000
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ID	Issue	Agreement reached	Date agreed	Relevant documentation
6.1e	Operational parameter: acceptable overhead line clearances	The Applicant and the BGA agree that, except when necessary for take-off or landing, clearances should not be less than 150m (500ft) within a radius of 150m (500ft) from the aircraft, in accordance with SERA.5005(f); for purposes of quantitative risk modelling it is agreed a minimum vertical clearance of 30m (100ft) over the overhead line is a reasonable parameter to be applied to landing scenarios, resulting in projected aircraft approach heights of between 100m (320ft) and 207m (680ft) at 3km from the aerodrome in the case of Tibenham; this is recognised as a reasonable range of heights, accommodating varied performance and approach angles, including real-life data obtained by the BGA from a typical sailplane at another aerodrome.	29 June 2026	Civil Aviation Authority (2024) UK Standardised Rules of the Air: Annex I - Rules of the Air, Section 5 SERA.5005 Visual flight rules;
6.1f	Operational parameter: lowest safe height for turns for aerotow after take-off	The Applicant and the BGA agree this is a subjective parameter; whilst the Applicant considers 30m (100ft) above the departure end threshold elevation to be a reasonable minimum safe turn commencement height, it has applied the BGA's parameter of 91m (300ft) to modelling for Tibenham and calculated that a horizontal clearance from the overhead line of 600m can be achieved, well in excess of the minimum safe lateral clearance of 150m applied as a Project design parameter.	29 June 2026	

7. Matters Not Agreed

The Stakeholder has advised on the below matters but it is acknowledged full resolution may be beyond their remit, with dependencies on operator risk acceptance and consideration of reasonable mitigation measures as reflected within the summary table.

ID	Issue	British Gliding Association position (including date)	National Grid position (including date)	Relevant documentation
7.1	Aviation Impact Assessment Methodology and Key Assumptions	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. Tibenham airfield is the home of the Norfolk GO, 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 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.	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 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	6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]; Civil Aviation Authority (2024) UK Standardised Rules of the Air: Annex I - Rules of the Air, Section 3, Chapter 1 SERA.3105 Minimum heights; Civil Aviation Authority (2024) UK Standardised Rules of the Air: Annex I - Rules of the Air, Section 5

1-3 Strand
London WC2N 5EH

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ID	Issue	British Gliding Association position (including date)	National Grid position (including date)	Relevant documentation
		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. 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 flown horizontally. As a result, sailplanes	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. 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 clearance margins (both vertical and lateral) and maximum gradient angles considered in relation to take-offs and approaches by different aircraft classes. National Grid considers UK SERA and CAA ORS4 1496, in relation to minimum heights to be relevant to assessed overhead line clearances (including for Tibenham, as defined within Table A15.2.11) especially where these relate to aircraft take-off and landing. This is	SERA.5005 Visual flight rules; UK Civil Aviation Authority (2021) Official Record Series 4, No. 1496: (UK) Standardised European Rules of the Air- Exceptions to the Minimum Height Requirements 8.9.2 Applicant's Response to Second Written Questions [REP5-211]

ID	Issue	British Gliding Association position (including date)	National Grid position (including date)	Relevant documentation
		can fly at a relatively shallow approach angle towards an airfield. 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. 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,	notwithstanding that the lateral minimum clearance specified of 150m (500ft) is consistent with the "500 feet rule". 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, 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. (March 2026) 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	

ID	Issue	British Gliding Association position (including date)	National Grid position (including date)	Relevant documentation
		assessed, and licensed by the CAA. Note that CAP 793 Safe Operating Practises for Unlicensed Airfields Chapter 1 Paragraph 4 states "where flying training is taking place additional safety margins (and risk assessment) should be considered" 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	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: • 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 (to ascertain compliance with UK SERA and CAA ORS4 1496 Minimum Height requirements) • Best practice/minimum heights of glider at aerodrome boundary on approach We seek further engagement with the Stakeholder, and ideally the operator of	

1-3 Strand
London WC2N 5EH

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		from the airfield that they cannot safely clear obstacles on a constantly descending approach to the airfield, they 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. 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	Tibenham aerodrome, to progress these technical matters. (May 2026) Further to the BGA's provision of gliding-specific operational parameters (see Appendix A), National Grid proposes in-depth discussion to confirm areas of agreement and identify the need for any changes to its methodology to ensure appropriate consideration of gliding operations. (May 2026) National Grid has agreed to undertake further overhead line clearance modelling to consider BGA-suggested parameters including a 10m aerodrome threshold crossing height and a 1.5% slope approach to determine whether adequate glider clearance margins during landing can be agreed. Appendix A (7.1.e)) refers. (June 2026)	

1-3 Strand
London WC2N 5EH

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		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 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. 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). It appears from documents seen subsequent to recent exchanges that there has been inadequate consideration of aviation as a routing constraint before	Notwithstanding agreed operational parameters and modelling outcomes, the Applicant notes the BGA's outstanding concerns that sailplane pilots may approach Tibenham aerodrome from a particularly low height and with a shallow (but within the modelled range) glide angle, thereby facing increased operational risk associated with reduced overhead line clearances. The Applicant position remains that this circumstance would be at the upper end of glide performance and therefore not typical, and that reasonable mitigation options exist to address this risk (see Matter 7.3) Further to the BGA's newly raised comment regarding consideration of aviation within early route development, the Applicant refers to its response to the Examining Authority's question SS 2.3 within 8.9.2 Applicant's Response to Second Written Question [REP5-211] (pages 202 to 205). Within this full response the Applicant makes clear that, during development of the preferred corridor graduated swathe, aviation sites did not form a constraint to be avoided by a defined	

1-3 Strand
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		National Grid announced the preferred route corridor for the proposal to upgrade the Norwich to Tilbury transmission line in 2022. Subsequent engagement and consultation have resulted in assumptions by NG. (July 2026)	separation. This is not required by legislation, regulation or national policy. Aerodromes were therefore treated similarly to other interests (such as listed buildings or third party developments). The Applicant's approach has instead enabled ongoing, nuanced, risk-based consideration (informed by consultation and engagement with relevant parties) of how the emerging design interacts with aviation interests and how this interaction might most appropriately be responded to. The assumptions within the approach are summarised within paragraphs 15.3.26 to 15.3.28 of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impacts [REP4-161] and include those subject to recent modelling and agreement with the BGA. We are grateful this recent engagement has enabled particular focus on glider-specific parameters, following concerted effort to process discussions with other parties (July 2026).	
7.2	Proposed Project Alignment and Aviation Impact	We refute the overall NG implied position that following its nuanced aviation appraisal, designed to overcome the	National Grid's impact assessment conclusions for Tibenham aerodrome are that, whilst the Project will represent a new	6.15.A2 Environmental Statement

1-3 Strand
London WC2N 5EH

T: +44 (0)20 7004 3000
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	Assessment Conclusions	potential difficulty of the CAA's published position re obstacles within 2km of an aerodrome, the proposed development will result in an acceptable level of increased risk and associated reduction in utility of the site. What is acceptable to NG, which has no responsibility once the planning application is considered and accepted, is not acceptable to the BGA and Norfolk Gliding Club. (July 2026)	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 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. 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	Appendix 15.2 - Review of Aviation Impact [APP-267] 6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3km Study Area [APP-266] 5.15 Design Development Report [APP-122] Civil Aviation Authority (2024) UK Standardised Rules of the Air: Annex I - Rules of the Air, Section 3, Chapter 1 SERA.3105 Minimum heights; Simplified Rules for Regional and Club

1-3 Strand
London WC2N 5EH

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			appropriately justified by potential adverse impacts to the aerodrome. Further explanation of this consideration is provided within the Design Development Report [APP-122] (paras. 2.6.9, 4.5.1 and 4.5.2 refer). 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). 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.	Competitions (BGA, 2022) CAP 393: Regulations made under powers in the Civil Aviation Act 1982 and the Air Navigation Order 2016 (CAA, 2021)

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			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. (March 2026) Based on the gliding-specific information provided to date, National Grid considers that its impact assessment conclusions remain	

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			accurate. Further engagement is sought to develop and challenge or verify this position. (May 2026) The Applicant position is that recent modelling undertaken verifies operational parameters applied within its assessment methodology and thereby validates impact assessment conclusions. Paragraph 15.3.23 of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impacts [REP4-161] makes clear the Applicant methodology responds to the CAA's CAP 793 guidance recommending that obstacles over 150ft should not be sited within a radius of 2km of the aerodrome centre point. As per the Applicant response to SS 2.3 within 8.9.2 Applicant's Response to Second Written Question [REP5-211] it is explained how this generic parameter, recommended in the context of runway design, is both unsuitable in terms of risk mitigation and disproportionate in its effect. The Applicant's undertaking of impact assessments to inform development of the	

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			Project design, and for the design (where possible) to minimise impacts on aerodrome operations and safety is in accordance with the requirements of NPS EN-1 (2024) (paragraphs 5.5.37 and 5.5.50 refer). The Applicant has recognised the responsibility of the operator for the safeguarding of Tibenham aerodrome, and has therefore been seeking to determine their position regarding risk acceptability and the potential for reasonable changes to operational procedures to be made if necessary (EN-1 paras 5.5.16 and 5.5.50 to 5.5.51 refer). (July 2026)	
7.3	Mitigation Measures	Beyond these points [referring to gliding-specific operational parameters 7.1 a) to f) within Appendix A], additional mitigations [for Tibenham aerodrome] could of course include locating the pylons further to the west, reducing their height, or burying the cables underground. (May 2026)	Notwithstanding the National Grid position that glider clearances of the proposed OHL are adequate in terms of safety and substantive design changes are therefore not justified, the consideration of a relocation or reduction to the height of the overhead line requires clarity from aviation stakeholders (including the operator) on what clearances would need to be achieved to be acceptable (see 7.1.e)). (May 2026)	Overarching National Policy Statement for Energy (EN-1, 2024)

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			Recognising national policy for Nationally Significant Infrastructure Projects (NSIPs) in the energy sector (NPS EN-1 2024) requires aerodrome operators to regularly review the possibility of agreeing to make reasonable changes to operational procedures (paragraph 5.5.50 refers), the National Grid position remains that reasonable changes to gliding competition finishes may be an appropriate mitigation to residual risk resulting from the presence of the proposed overhead line in the vicinity of an aerodrome. It is anticipated that the further modelling being undertaken in relation to adequate clearance will inform respective positions regarding this proposed mitigation measure, understanding from the BGA that the potential for operational changes to be made to finish designs exists. Appendix A (7.1.c)) refers. (June 2026)	
			The Applicant position is that risk to Tibenham gliding operations can be realistically mitigated by reasonable changes to operational procedures including: measures to enhance sailplane pilot awareness of the	

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			obstacle and pre-flight planning (such as operator publication of detailed navigational information); operator implementation of local height restrictions (advising a minimum above ground height of 300ft over the overhead line, for example); operator definition of competition finishes to respond to the presence of the overhead line (such as a 3km ring finish at a minimum height of 137m (450ft), for example). (July 2026)	

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Appendix A

Gliding-Specific Operational Parameters

Operational Parameter	British Gliding Association Position	National Grid Position	Relevant documentation
7.1a Typical glide angles for approach and other phases of flight	There is a large variety of sailplane performance. A training glider at say 1 in 28 glide angle, or a high performance sailplane at say 1 in 60 glide angle. Relative to the ground, the achieved glide angle changes dependent on headwind or tailwind as well as the effects of rising or sinking air. When established on an approach to land at the stage where drag devices (eg air brakes or landing flap) need to be deployed, the glide performance can be typically reduced to 1 in 10 or in some cases, 1 in 5. Ref: several sailplane flight manuals.	We are content to accept these figures, recognising them to be realistic and well justified,	
7.1b When gliders are considered to be on approach (to ascertain compliance with UK SERA	When on a descending flight profile towards the landing area with the landing area in sight.	We would be grateful for further clarification of the origin and nature of the joint BGA/CAA interpretation.	Civil Aviation Authority (2024) UK Standardised Rules of the Air: Annex I -

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Operational Parameter	British Gliding Association Position	National Grid Position	Relevant documentation
and CAAORS4 1496 Minimum Height regulations)	Ref: BGA/CAA agreed interpretation of compliant and safe approaches to airfields by sailplanes, January 2007. BGA competition rules	We note Standardised European Rules of the Air (SERA) 3105 and 5005 describe minimum height requirement exemption 'when necessary for take-off or landing' and that the CAA further recognises, within ORS4, exemption for practising approaches to landing, if flown 'in accordance with normal aviation practice'. Our interpretation of SERA 3105 and 5005 is that a standard circuit, a recognised competition finish and similar glider manoeuvres are normal aviation practices and, if made with the intention to land, are necessary and therefore minimum height regulations do not apply. In the absence of definition of a specific range or position when landing commences, we therefore suggest a glider within gliding range of an aerodrome and intending to land need only ensure a suitable distance from an obstacle to avoid reckless or negligent flying to satisfy SERA 3101. We would be grateful for your views on this interpretation.	Rules of the Air, Section 3, Chapter 1 SERA.3105 Minimum heights Civil Aviation Authority (2024) UK Standardised Rules of the Air: Annex I - Rules of the Air, Section 5 SERA.5005 Visual flight rules UK Civil Aviation Authority (2021) Official Record Series 4, No. 1496: (UK) Standardised European Rules of the Air- Exceptions to the Minimum Height Requirements

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Operational Parameter	British Gliding Association Position	National Grid Position	Relevant documentation
			Civil Aviation Authority (2024) UK Standardised Rules of the Air: Annex I - Rules of the Air, Section 3, Chapter 1 SERA.3101 Negligent or reckless operation of aircraft
			British Gliding Association (2026) Rules for Rated Competitions
7.1c Finishing heights for competitions (generally, and specifically for Tibenham)	This question isn't clear, but we assume this means the height at which a competition flight finishes. That particular height is dependent on the competition rules. If the competition rule allows, it is possible to finish a competition flight having crossed the defined finish line on final approach to land. In other cases, the competition rules may require a finish ring at X	The description is consistent with our understanding and interpretation of definitions within BGA guidance. We request further clarity on how finish heights are defined by competition directors, and what heights are typically used at present by Norfolk Gliding Club to enable assessment of whether existing finish heights are compatible with safe overhead line (OHL) clearance, and what scope there is for finish heights to be adjusted to ensure safe clearance, if not.	British Gliding Association (2022) Simplified Rules for Regional and Club Competitions 6.15.A2 Environmental Statement Appendix 15.2 -

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Operational Parameter	British Gliding Association Position	National Grid Position	Relevant documentation
	height at Y distance from the airfield and the pilot continues to fly towards the airfield for landing. The finish Line definition is a line of defined length and direction, orientated from between 0-30 degrees to the perpendicular of the inbound track line and situated such that gliders can safely land directly beyond it without turning. The finish ring definition. A ring of specified radius (minimum radius 3km) around the finish point that must encompass the contest site and the landing circuits. The final leg distance is measured from the previous turn point to the edge of the finish ring. Ref BGA competition rules.	By way of example, a competition at Husbands Bosworth defined a 3km finish ring at 400 ft (122m) above the aerodrome. If a similar parameter was applied at Tibenham the 3 km finish ring would be approx. 600m beyond the proposed OHL and approx. 60m above it. To clear the OHL by the ASA-defined minimum margin (30m - paragraph 15.3.8 of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267] refers) a glider would need to descend on a 1 in 10 slope (recognised by BGA as a worst performance case). We suggest, therefore the potential exists for NGC to set a 'normal' (not unusually high) finish ring height to enable competition gliders to clear the OHL by a margin in excess of this ASA minimum. In finishing the competition, as they would be manoeuvring to land, they would be exempt from SERA minimum height regulations. We would be grateful for your views on this scenario.	Review of Aviation Impact [APP-267] Civil Aviation Authority (2024) UK Standardised Rules of the Air: Annex I - Rules of the Air, Section 3, Chapter 1 SERA.3105 Minimum heights
7.1d Best practice/minimum heights of glider at aerodrome boundary on approach	At a height that cannot endanger persons (seen or unseen), vessels or property. Ref: SERA.3101.	We agree with this general principle. To enable quantified impact assessment, we would be grateful for clarification of a specific minimum height. Recognising the figure of 30 ft above ground level quoted in relation to line finishes at boundaries within BGA competition rules and	British Gliding Association (2022) Simplified Rules for Regional and Club Competitions

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	BGA competition rules.	guidance, please can you confirm this is an appropriate measure.	British Gliding Association (2024) BGA Competition Organisers' Guide: Paragraph 2.20 - Finishing
7.1e Acceptable overhead line clearances (during any phase of flight)	Except when necessary for take-off or landing, not less than 150 m (500 ft) within a radius of 150 m (500 ft) from the aircraft. Ref: SERA.5005 (f).	Agreed. Please can the BGA advise what clearances are acceptable when take-off or landing are being undertaken. ASA has determined that when exempt from minimum height requirements 31m (100ft) vertically and 150m (500ft) horizontally are the closest safe distance to an obstacle such as an OHL (paragraph 15.3.8 of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]).	6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]
7.1f Lowest safe height for turns for aerotow after take-off	This is subjective and dependent on factors such as wind strength, turbulence, etc. 300' would seem reasonable for a low rate turn.	We agree this consideration is subjective. ASA has proposed 100ft as a safe turn height, based on a minimum safe bank angle and established practice at other aerodromes, although we recognise this does not always account for aerotow. In the case of Tibenham, we have calculated that using a 300ft minimum turn height there is sufficient horizontal clearance from the OHL (600m, determined by ASA modelling), well in excess of the minimum 150m as stated within 7.1.e).	

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