

Our Ref: 105181-024

09 May 2025

Borough Council of King's Lynn and West Norfolk  
[planning.policy@west-norfolk.gov.uk](mailto:planning.policy@west-norfolk.gov.uk)  
via email only

Fisher German LLP  
The Estates Office  
Norman Court  
Ashby de la Zouch  
LE65 2UZ

t. 01530 412821  
[fishergerman.co.uk](http://fishergerman.co.uk)

Dear Sir /Madam,

## Walpoles Neighbourhood Plan Regulation 16 Consultation (24 March 2025 until 12 May 2025)

### Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

#### About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Please also consult with NESO separately from NGET.

#### NGET assets within the Plan area

Following a review of the above Neighbourhood Plan, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.

##### Asset Description

4VV ROUTE TWR (001 - 223):400Kv Overhead Transmission Line route: NORWICH MAIN – WALPOLE 1 & 2
4ZM ROUTE TWR (200 - 338): 400Kv Overhead Transmission Line route: BURWELL MAIN – WALPOLE 1 & 2

4ZM ROUTE TWR (339 - 406 - 2WS017): 400kV Overhead Transmission Line route: SPALDING NORTH – WALPOLE & BICKER FEN - WALPOLE - WEST BURTON
General Electric International Inc: 132kV Overhead Transmission Line route: SB001 SUTTON BRIDGE - 1 & 2
Electrical Substation: Walpole 400kV and Walpole 132kV

A plan showing details of the site locations and details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

## NGET Electricity Network Infrastructure

The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

## New Infrastructure

National Grid provided a formal response to the Regulation 14 Draft Neighbourhood Plan in December 2024. We note and welcome that the requested word change from 'generate' to 'transmitted' at now paragraph 106 has been actioned within the Regulation 15 version, and that the upgrading of the electricity distribution networks are a 'Critical National Priority'.

The Walpoles Neighbourhood Plan area includes land directly affected by the Grimsby to Walpole (G2W) Project in Section 7 of the route, and within the Order Limits for Eastern Green Link 3 and 4 (EGL 3 & 4). The Neighbourhood Plan contains non-strategic policies covering the period up to 2036 to support and add further detail to policy matters already adopted in the King's Lynn and West Norfolk Local Plan which are specifically relevant to The Walpoles. This includes the mix of housing, design principles for new development, conserving and enhancing the natural environment, protecting local green spaces from development, and setting out other development management policies which are not addressed at a borough level.

The Neighbourhood Plan provides information on renewable energy development in the locality and references the NGET Great Grid Upgrade project and specifically the proposed new substation in the Walpole area as part of the G2W Project and the EGL 3 & 4 Projects.

## Biodiversity and Green Corridors

As detailed within the previous response on the (Regulation 14) Draft Neighbourhood Plan Policy 4: Biodiversity and Green Corridors, identifies a series of green corridors. A Green Corridor has been identified within the neighbourhood plan located at French's Road, Walpole Marsh, which lies adjacent to an area that the G2W project has identified for possible mitigation/BNG. The preamble to the policy details that Green Corridors link key blocks of habitat in the area and explains how green corridors are considered to be of benefit to both wildlife and people. We highlight Policy 4 as there is a potential opportunity for the further enhancement of the Green Corridor identified within the Neighbourhood Plan at this location as the potential BNG/mitigation area being proposed as part of the G2W Project

could join up with and extend the Green Corridor continuing the proposed linkage further south outside of the neighbourhood plan area.

Through the design development of the G2W Project several potential passing places have been identified along Marsh Road. These would be required for access during construction and have been identified as Marsh Road is too narrow for two HGVs to pass. Whilst the full detail is not yet available, it is assumed that the passing places would comprise a widening of Marsh Road highway road surface. It is acknowledged that there is a ditch along the southern side of Marsh Road, should the passing place be located where the ditch is, the ditch profile will be maintained. The passing places are required for access during the construction phases of the Project and it is anticipated that once construction is complete, the passing places will be reinstated/restored. The potential passing places are proposed at Marsh Road and this may impact the green corridor at Marsh Road as identified within draft Policy 4. Passing places would remain open in character and would be utilised on an ad-hoc basis and reinstated following construction.

Draft Policy 4 explains the requirements for developments affecting Green Corridors. There is a Design Checklist at Appendix B to the Neighbourhood Plan which may be applicable to elements of the G2W Project and the Eastern Green Link 3 and 4 Projects.

### **Renewable Energy, Low Carbon Technologies and Associated Infrastructure**

It is acknowledged that at paragraph 107 of the Neighbourhood Plan there is now reference to the National Grid projects Grimsby to Walpole and EGL 3 & 4, whereas in the previous version there was no reference to the EGL 3 & 4 Projects.

It is welcomed that draft Policy 10: Renewable Energy, Low Carbon Technologies and Associated Infrastructure, seeks to encourage planning applications for renewable energy or associated infrastructure such as battery energy storage, solar or wind farm developments or substations subject to defined criteria. The criteria is:

1. Development should be carefully designed to be well screened by using appropriate green landscaping such as native trees or shrubs and set out in a management plan how screening will be maintained in the entirety of the developments lifetime;
2. Large scale development should undergo a landscape visual assessment to avoid causing significant adverse harm to the landscape and publicly visible views;
3. Development should ensure there is appropriate onsite parking for visitors which is screened from the street;
4. New, replacement, or existing developments should incorporate low carbon technologies into the scheme layout, where appropriate to the scale of the project, and ensure that these technologies do not have an adverse impact on the character of the area.

National Grid will have consideration to these criteria during the design evolution of the G2W and EGL 3 & 4 projects.

### **Walpole Substation Expansion**

Further to the G2W and EGL 3 & 4 projects there is another project which forms part of The Great Grid Upgrade which involves the expansion of the Walpole Substation to accommodate new infrastructure at the existing substation. NGET will be upgrading the existing technology which was originally installed when the substation was built in the 1960s. This work will be essential to connect new sources of renewable energy, manage power flows on the network, and support future demand.

NGET have permitted development rights to deliver some of the work needed for this project, whilst other parts of the project will require planning permission. The project team has reviewed the feedback received from consultation in 2024 and are preparing to submit the planning application in summer 2025.

The below link provides further information on this project.

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/walpole-substation-expansion>

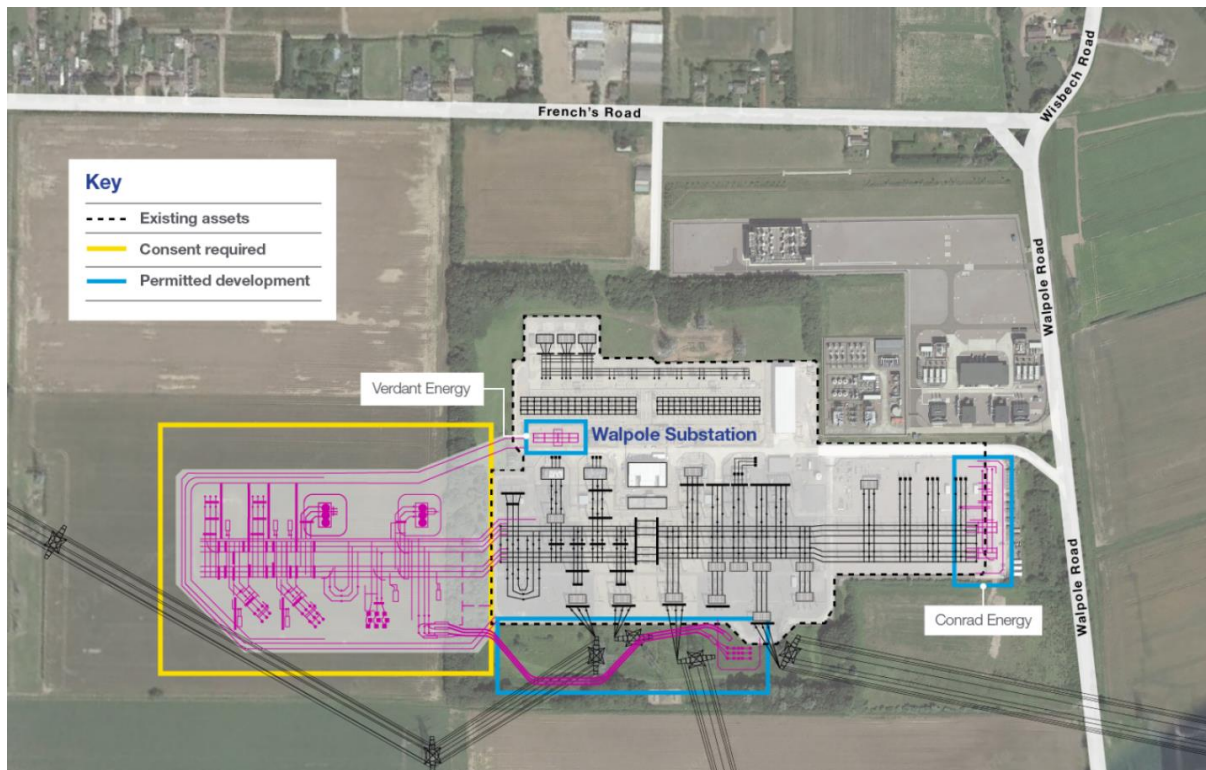


Figure 1- Walpole Substation expansion

Similarly to the G2W and EGL 3 & 4 projects, NGET will have consideration to the criteria within draft Policy 10 in the preparation of this planning application.

### Further Advice

NGET is happy to provide advice and guidance concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

### Angela Brooks MRTPI, Partner



Fisher German LLP  
The Estates Office  
Ashby de la Zouch  
LE65 2UZ

### Tiffany Bates, Development Liaison Officer



National Grid Electricity Transmission  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

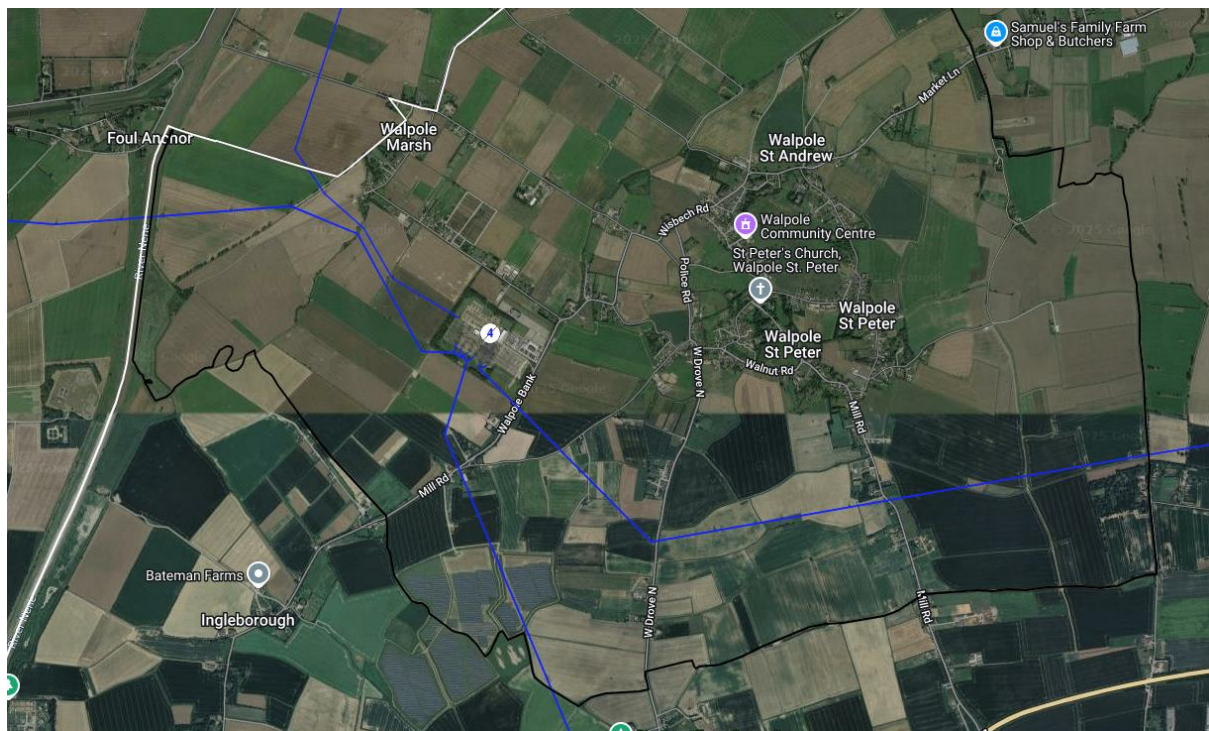




Angela Brooks MRTPI  
Partner

For and on behalf of Fisher German LLP

## National Grid Assets Interacting with Neighbourhood Plan Area



Existing asset illustrated as blue line on above plan

### Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/345326/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: <https://www.nationalgrid.com/document/349291/download>

### How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [ngplanning@fishergerman.co.uk](mailto:ngplanning@fishergerman.co.uk)