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Borough Council of King's Lynn and West Norfolk
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

Dear Sir /Madam,

Walpole Cross Keys 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 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

The Great Grid Upgrade

Demand for electricity is expected to rise as the way we power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered our economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.

The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim.

NGET's infrastructure projects in England and Wales will support the country's energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain.

The way we generate electricity in the UK is changing rapidly, and we are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. We need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.

Eastern Green Link 3 and 4 Schemes

Eastern Green Link 3 (EGL 3) Eastern Green Link 4 (EGL 4) are two projects that are part of the Great Grid Upgrade. They are being developed by NGET together with Scottish Hydro Electric Transmission Ltd (SHE-Transmission), who are operating and known as Scottish and Southern Electricity Networks Transmission (SSEN Transmission), and Scottish Power Transmission (SPT), who are operating and known as Scottish Power Energy Networks (SPEN), respectively. Both EGL 3 & EGL 4 comprise a 2GW High Voltage Direct Current (HVDC) link to reinforce the electricity transmission system between Scotland and England. EGL 3 and EGL 4 are separate projects, independent of one another; however, they follow the same onshore cable route in England for the majority of their length and will have a common connection point to the existing transmission network in Norfolk. This connection point - the new proposed Walpole substation - is needed in addition to two new converter stations in the vicinity of the existing Walpole substation.



Figure 2: Proposed EGL 3 and 4 route

A Development Consent Order (DCO) to provide the appropriate permissions for the projects is expected to be submitted in 2026. Following this, construction is planned to start in 2028, with the projects aiming to be fully operational after 2033. As EGL 3 & 4 facilitate the transmission of offshore wind energy, directly supporting the UK's commitment to fully decarbonising the power system by 2035, the projects are considered to be part of the Government's critical national priority (CNP) for the provision of nationally significant low-carbon infrastructure.

The starting point for determining this DCO will be 'National Policy Statement EN-1: Overarching National Policy Statement for Energy', which provides the overall framework for UK energy infrastructure planning, in addition to 'National Policy Statement EN-5: Electricity Networks Infrastructure', which focuses specifically on the policies related to electricity grids and transmission. However, Neighbourhood Plans within the vicinity of EGL 3 & 4 can inform the design development of the projects, ensuring alignment with local priorities and community aspirations.

Walpole Cross Keys Neighbourhood Plan

The proposals for EGL 3 & 4 include order limits that are adjacent to the designated area for Walpole Cross Keys. As such, NGET has highlighted a number of key policies from the proposed Walpole Cross Keys Neighbourhood Plan Review that may have a direct interaction with its proposals, and has prepared a number of comments to help inform the Plan:

Policy 8 - Protection of Important Local Views

As NGET are seeking to construct both converter stations and the Walpole B Substation within the area, we acknowledge the significance of the key views identified in the Walpole Cross Keys Neighbourhood Plan Views Assessment. In particular, views 7 (looking west on Station Road North) and 8 (looking southwest on Station Road South) are potentially impacted by the EGL 3 & 4 development.

Recognising the policy's emphasis on ensuring new development is not visually intrusive, NGET are committed to integrating design measures that respect and mitigate potential impacts on these views. The substation will be thoughtfully sited to minimise its visibility from key vantage points. Moreover, appropriate screening, such as landscaping, tree planting, and sympathetic fencing, will be incorporated to soften its visual impact and ensure it blends harmoniously with the surrounding environment.

Furthermore, the form and scale of the substation and converter stations will be carefully considered to align with existing structures in the area, ensuring it does not dominate or detract from the identified public views. A detailed visual impact assessment will be conducted to demonstrate that all reasonable steps have been taken to avoid or mitigate any adverse effects.

Policy 9 – Dark Skies

NGET is committed to responsible construction practices and recognises the importance of ensuring that external lighting is designed to minimise environmental impact, preserve local biodiversity, and maintain the visual integrity of the surrounding area.

For both the construction and operation of EGL 3 & 4, lighting solutions will endeavour to align with the principles outlined in the policy. As such, the controls and measures relating to these effects will be set out under the proposed Construction Method Statement, Code of Construction Practice, Lighting Management Plan, Design Development Report, and Outline Landscape and Ecology Management Plan, as well as in accordance with noise and lighting levels under an environmental permit relating to the construction, maintenance or operation of the convertor stations and Walpole B Substation.

Policy 13 – Transport & Access

EGL 3 & 4 is currently undergoing a design process which will aim to ensure that existing routes remain accessible and fully functional, preventing any unnecessary disruption to pedestrian and vehicular movements. A comprehensive Transport & Traffic impact assessment will be undertaken to evaluate potential effects on traffic patterns, biodiversity, and drainage. Any risks identified will be mitigated appropriately, potentially including measures such as enhanced drainage solutions, habitat conservation strategies, and road safety improvements to ensure the balance between infrastructure growth and environmental protection.

This Assessment will also address whether there are any impacts on Public Rights of Way in the parish, and, where necessary, establish any alternative diversions or new pathways to ensure minimal disruption while adhering to community needs and local planning requirements.

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

ngplanning@fishergerman.co.uk

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

Tiffany Bates, Development Liaison Officer

box.landandacquisitions@nationalgrid.com

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

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