

Our Ref: 105181-024

01 May 2026

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via email only

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The Estates Office  
Norman Court  
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Dear Sir /Madam,

## Hyndburn Local Plan to 2040 Proposed Modifications Consultation March – May 2026 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. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

### NGET assets within the Plan area

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

#### Asset Description

##### Overhead Transmission Line:

OHL - KEARSLEY - PADIHAM -PADIHAM - PENWORTHAM -400

A plan showing 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.

With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.

## **Policy Commentary**

Having reviewed the consultation document NGET wishes to comment on the following Main Modifications:

### **Main Modification 105 (MM105) - Policy EP3: Land between Blackburn Rd, Sidebeet Lane, Leeds & Liverpool Canal and railway (EMP5)**

#### ***Previous response on behalf of NGET***

A response was submitted to the Hyndburn New Local Plan Regulation 19 Publication Consultation in March 2024 on behalf of NGET by Avison Young. This response proposed the following:

"We propose modifications to the above site allocations and/or policies to include wording to the following effect:

#### **Policy EP3: Land between Blackburn Road, Side beet Lane, Leeds and Liverpool Canal and railway (EMP5)**

"2. The development will be developed with the following site-specific criteria

"j. a strategy for responding to the NGET overhead transmission lines present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

We support the inclusion of wording in Policy EP3 via MM105 (xviii) and acknowledge this provides some comfort that the presence of NGET assets are at least highlighted with a broad reference to adequate mitigation being required should the site be developed. It is noted also that similar wording now applies to Policy EP4 at Main Modification 112, albeit for another utility provider's overhead transmission line route.

Notwithstanding the above, the wording included within the Main Modification version of Policy EP3 fails to include all aspects proposed to the Regulation 19 consultation as specified above, yet we feel the additional wording helps provide clarity both to the Council and any future developers around what is expected in terms of mitigating the presence of NGET assets. Therefore, to ensure Policy EP3 is as effective as it can be, we continue to propose inclusion of the following additional wording (*red italics*) as an addition to the wording already included:

xviii. *“Development should have regard to the overhead transmission lines crossing the site, ensuring that any impacts are adequately mitigated by demonstrating how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design”*

In addition, we propose Policy EP3 and specifically requirement xxiii as proposed by MM105 is supported by a footnote reference to include the link to the ‘*Design guidelines for development near pylons and high voltage overhead power lines*’ document produced by National Grid to aid developer understanding and provide clarity. The link to include is as follows: <https://www.nationalgrid.com/document/345326/download>

## New Infrastructure

Demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low-carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low-carbon generation.

The way NGET generates electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy. NGET 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. Taking this context into account, In planning for the area the Council should:

- **Safeguard all existing NGET transmission assets**, including overhead lines, underground cables and substations.
- **Support future reinforcement and expansion**, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.

- Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.
- **Safeguard existing and potential access routes** required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.
- **Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access**, unless suitable mitigation or alternative agreed routes can be secured.
- **Encourage early engagement with NGET** to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security.

### Conductor Replacement's on the existing circuits between Carrington and Penwortham and Penwortham and Padiham (PCR1)

NGET are proposing refurbishment works to the existing overhead lines between Carrington & Penwortham and Penwortham & Padiham involving higher capacity conductors. This project is still at early maturity. More information can be found at the following link: <https://www.neso.energy/document/304756/download>

### Further Advice

NGET is happy to provide advice and guidance to the Council 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 Development Plan Document (DPD) 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:

[Redacted]

[ngplanning@fishergerman.co.uk](mailto:ngplanning@fishergerman.co.uk)

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The Estates Office  
Ashby de la Zouch  
LE65 2UZ

[Redacted]

[box.landandacquisitions@nationalgrid.com](mailto: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,

[Redacted Signature]

[Redacted Name]

Partner

For and on behalf of Fisher German LLP



Regulated by  
**RICS**



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## 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.

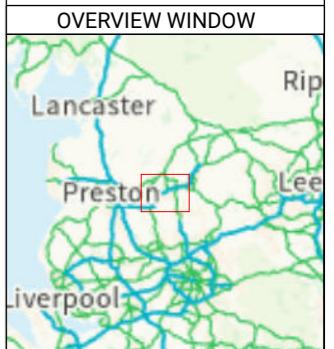
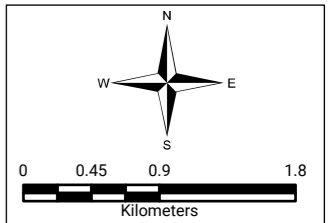
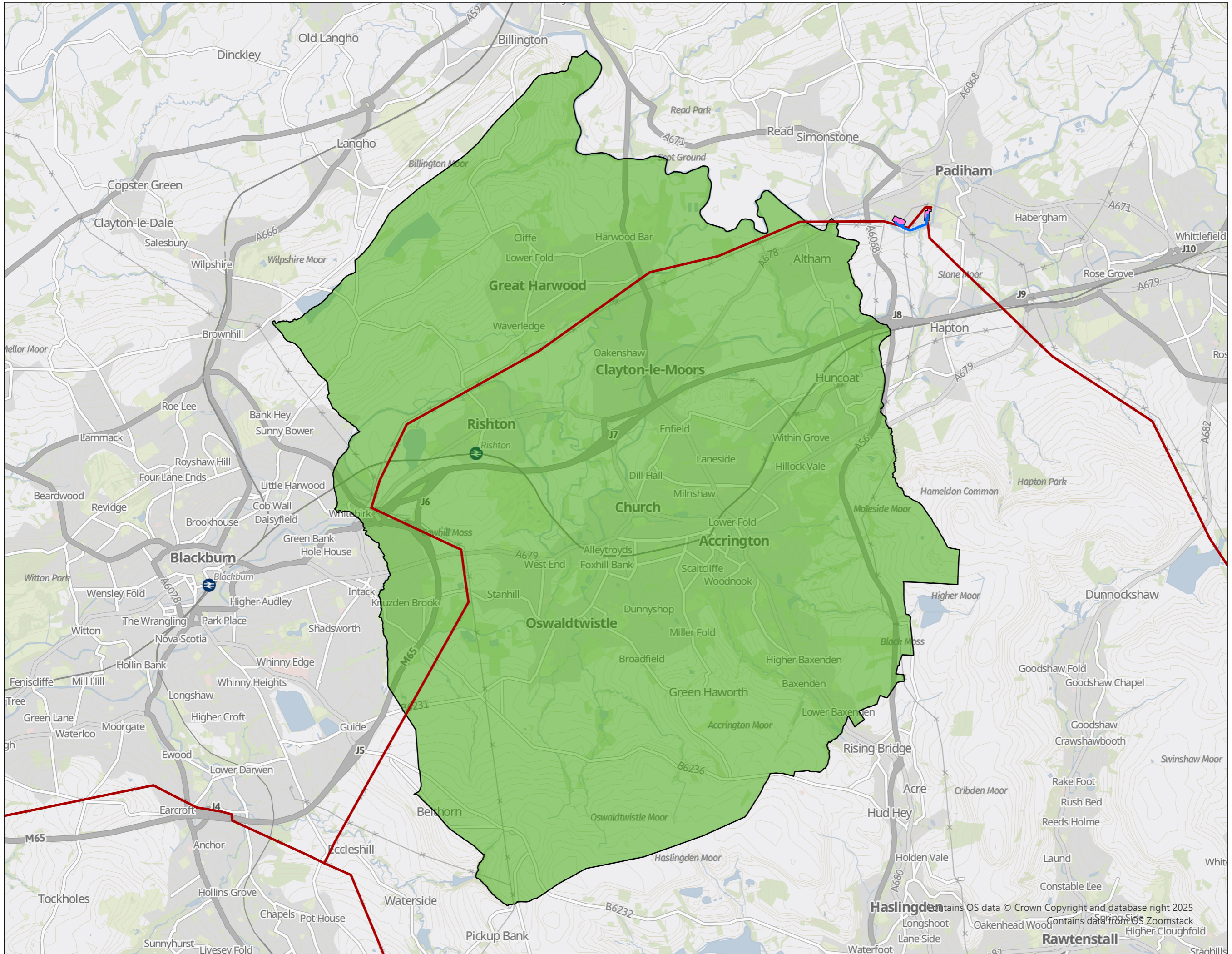
NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: <https://www.nationalgrid.com/document/349291/download>

## 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/>

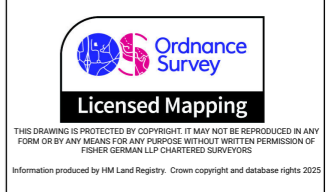
For local planning policy queries, please contact: [nqplanning@fishergerman.co.uk](mailto:nqplanning@fishergerman.co.uk)





- LEGEND:**
- Cable
  - OHL
  - Substation
  - LPA Area

REVISION: A  
 CLIENT: **nationalgrid**  
 SCHEME:  
 PLANNING INTERACTION  
 TITLE:  
 LPA ASSET INTERACTION  
 FP: 105181-024  
 SCALE: 1:50,000 @ A3  
 DATE: 20/05/2025



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**DRAWING REF:**  
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