



From: NG Planning [REDACTED]
Sent: 07 July 2026 14:21
To: Local Plan
Subject: Newham Local Plan - Main Modifications Consultation - NGET Response
Attachments: Newham Local Plan - Main Modifications Consultation - NGET Response.pdf

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Dear Sir / Madam,

Newham Local Plan Main Modifications Consultation May – July 2026

Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission (NGET) 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 attached representation with regard to the current consultation on the above document.

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

Kind Regards,

Bradley

Our Ref: 105181-024

07 July 2026

Newham Borough Council
localplan@newham.gov.uk
via email only

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



fishergerman.co.uk

Dear Sir /Madam,

Newham Local Plan Main Modifications Consultation May – July 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.

Proposed development sites crossed or in close proximity to NGET assets

Following a review of the above Main Modifications, we have identified that one or more proposed development sites are crossed by or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below:



Regulated by
RICS



Development Plan Document Site / Designation	Asset Description
N2.SA4 Thameside West (MM118)	ZR ROUTE TWR (063A - 93) 400KV Overhead Transmission Line Route: BARKING - WEST HAM 1. BARKING - WEST HAM 2.
N13.SA3 Former East Ham Gasworks (MM199), (MM200) & (MM203)	ZR ROUTE TWR (063A - 93) 400KV Overhead Transmission Line Route: BARKING - WEST HAM 1. BARKING - WEST HAM 2.
N11.SA1 East Beckton Town Centre (MM188), (MM190), (MM191)	ZR ROUTE TWR (063A - 93) 400KV Overhead Transmission Line Route: BARKING - WEST HAM 1. BARKING - WEST HAM 2.
Policy N7.SA2 Twelvetrees Park and Former Bromley (MM147) & (MM149)	Underground Cable: CITR4 - WHAM4 CABLE SECT: 40-42 CABLE ROUTE: CITY ROAD - WEST HAM
Policy N3.SA1 Royal Albert North (MM125) & (MM127)	ZR ROUTE TWR (063A - 93) 400KV Overhead Transmission Line Route: BARKING - WEST HAM 1. BARKING - WEST HAM 2.

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.

Interactions Commentary

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.

Previous Statement of Common Ground between NGET & Newham Borough Council

A Statement of Common Ground ('SOCG') was signed between National Grid Electricity Transmission (NGET) & London Borough of Newham on the 7th April 2025, following comments made by NGET in response to the Regulation 19 Consultation on the Submission Draft Local Plan (July – September 2024). The SOCG details the following:

"5.3 Newham has considered the comments submitted by National Grid as part of the Reg 19 consultation and will make and propose the following modifications set out in the table below.

Site Allocation and Section	Modification (new text in bold)
N2.SA4 Thameside West Phasing and Implementation	[minor modification] The potential impact of the existing on-site sewer and existing overhead transmission line route on design and layout should be taken into account at the pre-application stage through early engagement with Thames Water and National Grid.
N13.SA3 Former East Ham Gasworks Site Profile [minor modification] Utilities - Overhead transmission line route	N13.SA3 Former East Ham Gasworks Site Profile [minor modification] Utilities - Overhead transmission line route
N13.SA3 Former East Ham Gasworks Design Principle	[minor modification] The design and layout of the site should take into consideration the electricity pylons on the eastern boundary of the site and the existing overhead transmission line route , and minimise the impact of noise from any required Pressure Reduction System on residential amenity.
N11.SA1 East Beckton Town Centre Site Profile	[minor modification] Utilities - Overhead transmission line route
N11.SA1 East Beckton Town Centre Design Principle	[minor modification] The design and layout of the site should take account of the existing overhead transmission line route and risk of flooding from all sources and meet the requirements of Local Plan Policy CE7.
N11.SA1 East Beckton Town Centre Phasing and Implementation	[main modification] The potential impact of the existing overhead transmission line route on design and layout should be taken into account at the preapplication stage through early engagement with National Grid.

5.4. During written engagement towards the preparation of this SOCG, and in addition to Reg. 19 representations, on further review, National Grid also recommended a mapping modification to be made in respect of the Policy NS11.SA1 East Beckton Town Centre Map to include the addition of "sensitive edge (infrastructure)" to illustrate the existing overhead transmission line route. Mapping of the route was provided in National Grid's response to the Regulation 19 consultation and can be used to aid this mapping modification.

5.5 Newham have note that [sic] the additional late request, and consider this is not necessary for soundness as all site allocations mapping is indicative only and the text minor modifications will support the same outcome. [Our Emphasis]

National Grid agree that the Newham Local Plan provides an effective framework for managing the impact of development on energy infrastructure."

Newham Council's position is clear that, subject to the proposed amendments, the site allocation policies appropriately account for NGET assets, concluding that further adjustments to mapping are not needed for the purpose of soundness (such as for N11.SA1 East Beckton Town Centre), as the maps are considered illustrative in nature. NGET support additions to Policy text but wishes to comment on the approach to mapping within the Schedule of Modifications, as detailed below.

Within the Schedule of Modifications, site allocation 'Maps' for each site allocation contained within the Regulation 19 Part 2 Plan are now titled 'Indicative Diagram' pursuant to Main Modification 92. MM92 is understood to apply *"Across all relevant sections of Part 2 of the Plan"* and thus introduces amendments to mapping for the allocations that are the subject of this representation. Commentary on the associated allocations continues below.

N13.SA3 Former East Ham Gasworks (MM199), (MM200) & (MM203)

NGET would like to voice its support for changes made at MM199 & MM203, which satisfy the request to modify allocation Policy N13.SA3's conditional text as per the April 2025 SOCG NGET and feel these amendments to Policy N13.SA3 add additional value to the Policy and provide clarity to developers around what is required of development of the allocations in the Council's jurisdiction, identified to be encumbered by NGET assets.

Notwithstanding the above, whilst it is acknowledged the Council feel the inclusion of adequate policy wording eliminates the need for modifications to site allocation mapping, MM200 – in adjusting the site allocation map to an 'Indicative Diagram' – appears to remove the "Sensitive edge – Infrastructure" illustration from the diagram (See Figure 1). The implementation of policy wording is supported; however, we request the "Sensitive edge – Infrastructure" is reinstated.

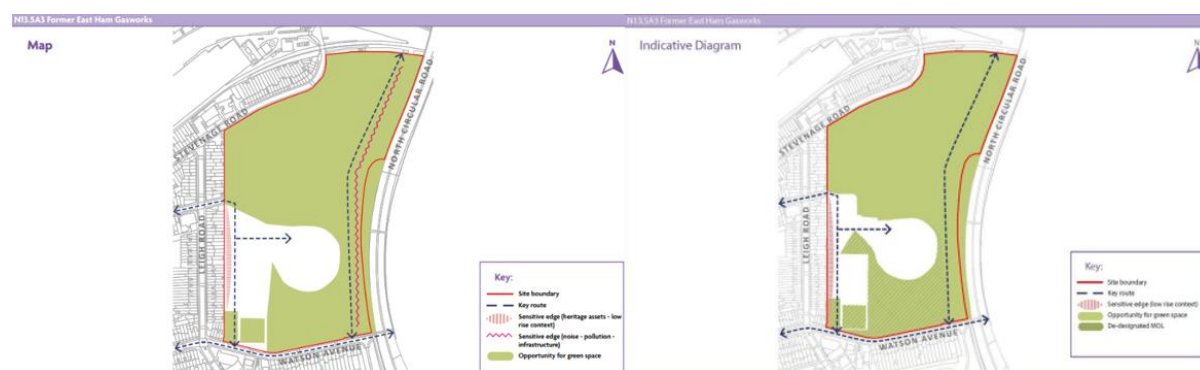


Figure 1: Removal of "Sensitive edge – Infrastructure" at MM200

Policy N7.SA2 Twelvetreepark and Former Bromley (MM147)/(MM149) & Policy N3.SA1 Royal Albert North (MM125)/(MM127)

In addition, whilst not as a direct result of MM125 & MM149, we note within the proposed Schedule of Modifications & Tracked Changes Plan that conditional text is included in the 'Phasing and Implementation' portion of the above allocations corresponding Development Conditions which provides recognition of NGET assets within the site, providing clarity to developers on the mitigation required to develop the site effectively. NGET support their inclusion within the Plan, as currently written.

However, similar to mapping changes relating to N31.SA3 as discussed above, proposed amendments to 'Indicative Diagrams' at MM127 & MM147 removes infrastructure from the 'Sensitive Edge' in the associated policies N7.SA2 & N3.SA1 'Indicative Diagram Key'. Whilst map changes are not included in the schedule relating to these two sites, deletion of reference to 'infrastructure' via MM127 & MM147 from the associated indicative diagram keys means the presence of infrastructure as a sensitivity is no longer referred to via the mapping. We consider such reference within the mapping to be of value and, thus, we propose that this element is retained.

N11.SA1 East Beckton Town Centre (MM188), (MM190), (MM191)

Whilst it is acknowledged changes made at MM188, MM190 & MM191 have satisfied NGET's request for modifications to the above allocations development conditions (due to the presence of a NGET OHL within the site), the request for a mapping modification to allocation N11.SA1 (as detailed in the SOCG) has not been actioned.

The Council's position is clear that mapping is indicative and that modifications to policy text achieve the same outcome, however as with the above, NGET consider the inclusion of a "Sensitive Edge – Infrastructure" as a part of site allocation mapping provides additional value and clarity to the associated Policy. NGET request mapping amendments are made as proposed in the SOCG in addition to positive changes made at MM188, MM190 & MM191 – which are again fully supported.

N2.SA4 Thameside West (MM118)

NGET would like to reiterate its support for positive changes made at MM188, which satisfy the request to modify allocation Policy N2.SA4's conditional text as per the April 2025 SOCG. NGET feel this amendment to the above allocation policy adds additional value and provides clarity to developers around what is required of the development in relation to NGET assets.

There are no Main Modification contained within the Schedule which would result in the modification of the site allocation 'Map' for N2.SA4. It is assumed therefore that the inclusion of "Sensitive Edge – Infrastructure" remains (See Figure 2). As considered in more detail above, NGET considers the retention of NGET asset illustration on site allocation mapping adds value to the policy beyond a purely illustrative function and request it is applied consistently across the affected allocations contained within this Representation. Policy wording added at MM188 is ultimately supported, nonetheless.

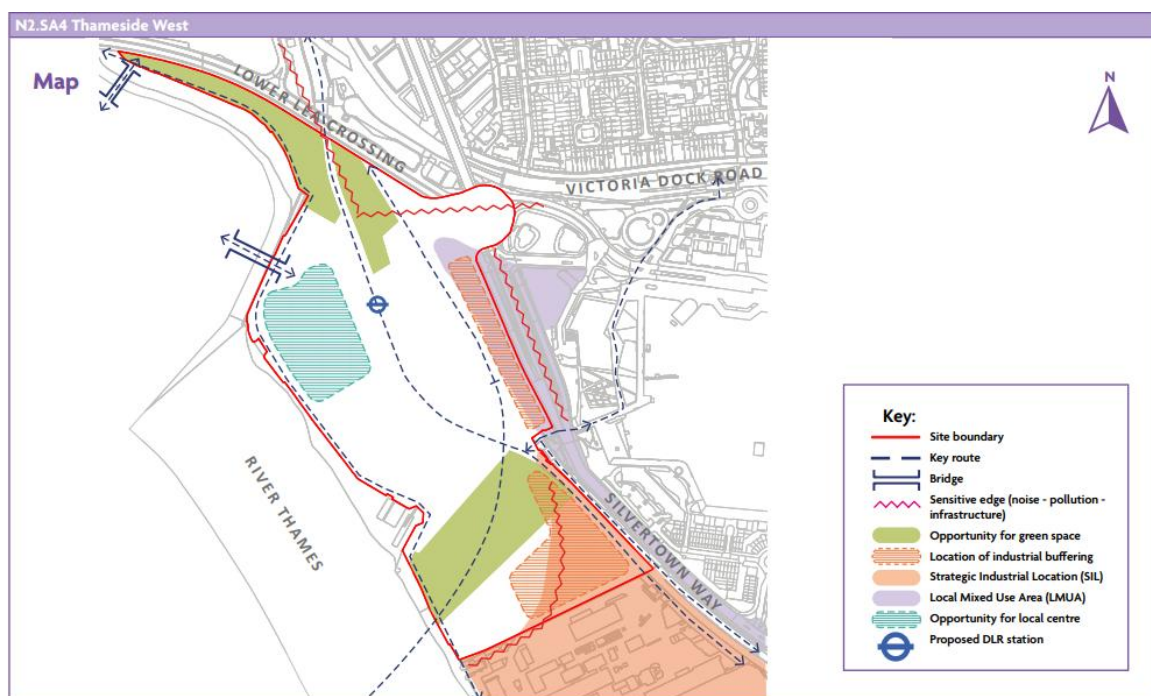


Figure 2: Site Allocation Map – N2.SA4 (Part 2 Plan)

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.

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:

Angela Brooks MRTPI, Partner



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

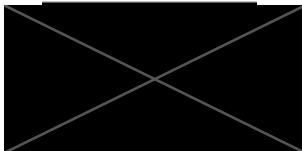
Tiffany Bates, Development Liaison Officer



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

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.

Working Near NGET 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>

NGET have produced additional guidance for decision makers on operational noise emitted from existing and planned substation infrastructure. Detail is provided for environmental factors, established acceptable British standards and the 'Agent of Change' principle underpinned by the NPPF. More information can be accessed here: <https://www.nationalgrid.com/document/573711/download>

Further information on working near NGET assets can be found on the following webpage: <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/working-near-our-assets>

Assessing Electricity Network Infrastructure Applications

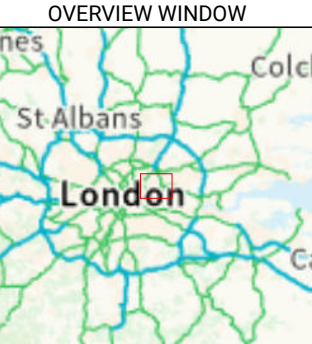
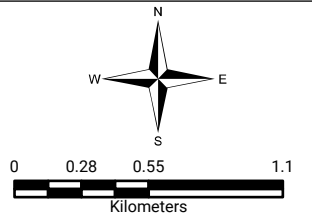
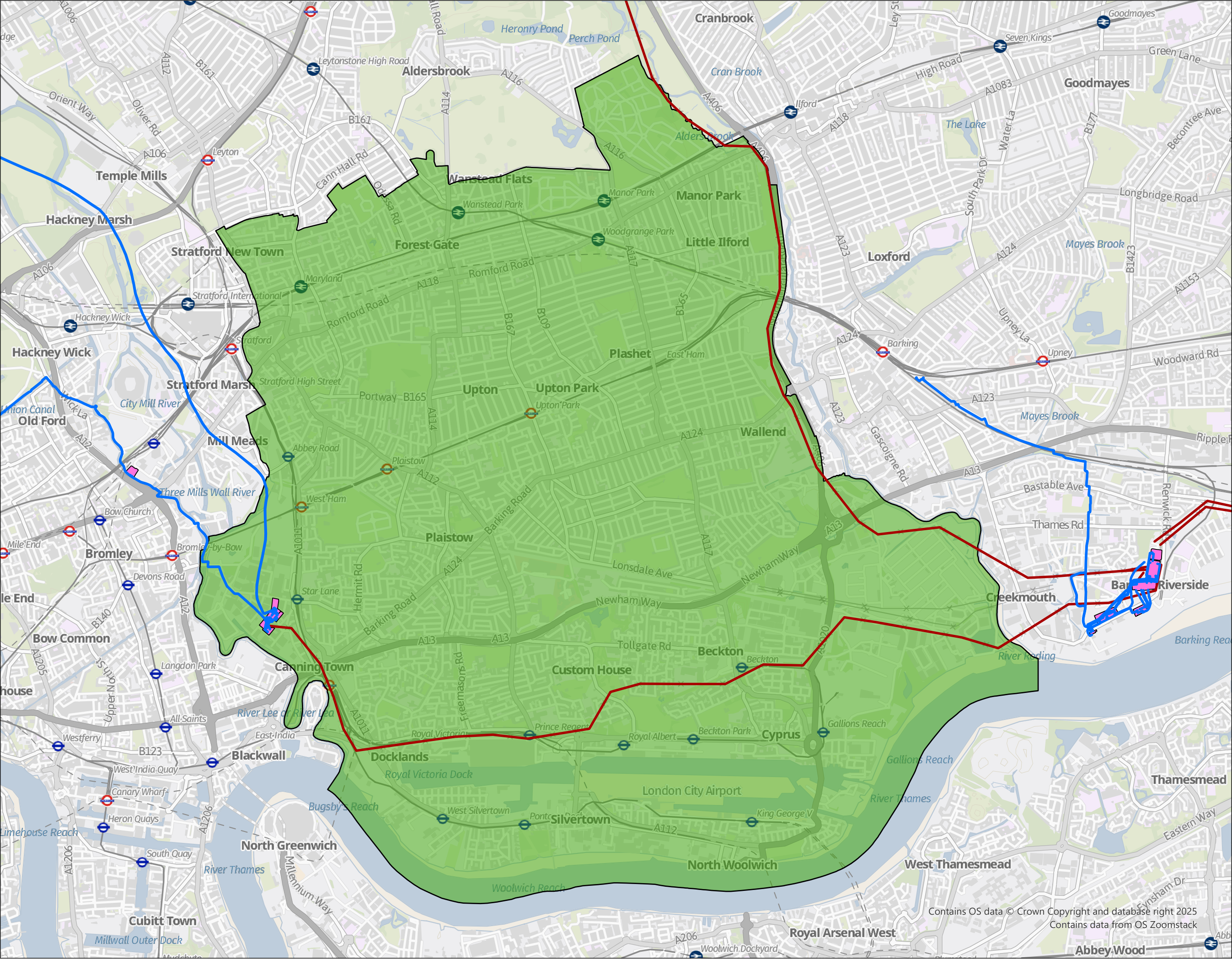
Regen, in partnership with the Department for Energy Security and Net Zero (DESNZ) have produced guidance for LPA's on assessing electricity network infrastructure applications. This is intended to be used as a practical tool for officers and details various legislative frameworks and infrastructure components that NGET engage with. More information can be accessed here: <https://3477141.fs1.hubspotusercontent-na1.net/hubfs/3477141/DESNZ%20planner%20guides/2026-03-31%20Assessing%20electricity%20network%20infrastructure%20applications%20-%20Regen.pdf>

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:





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

REVISION: A
CLIENT: **nationalgrid**
SCHEME:
PLANNING INTERACTION
TITLE:
LPA ASSET INTERACTION
FP: 105181-024
SCALE: 1:31,000 @ A3
DATE: 20/05/2025

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**fisher
german**
The Estates Office, Norman Court
Ashby de la Zouch,
Leicestershire, LE65 2UZ
01530 412821
fishergerman.co.uk
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