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Our Ref: 105181-024

05 November 2026

Cardiff City Council
LDP@cardiff.gov.uk
via email only

Dear Sir /Madam,

Cardiff Replacement LDP Hearing Session Matters October – November 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 Site Allocations or Designations crossed by or in close proximity to NGET assets

Following a review of the above Development Plan Document, we have identified that one or more proposed development site allocations or designations are crossed by or in close proximity to NGET assets. Details of the sites or designations affecting NGET assets are provided in the following table:

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Development Plan Site / Designation	Asset Description
Policy EC2 (PPC32) (PPC55) (MAC PM5A & MAC PM5B)	WG ROUTE: 275Kv Overhead Transmission Line route: TREMORFA - USKMOUTH – WHITSON & ABERTHAW – TREMORFA
Policy EC3.3	Overhead Trasnmisisn line Route: WG ROUTE: 275Kv Overhead Transmission Line route: TREMORFA - USKMOUTH – WHITSON & ABERTHAW – TREMORFA Electrical Substation: TREMORFA 275KV Substation TREMORFA 33KV Substation Landownership: National Grid Electricity Transmission Plc – Freehold – Tremorfa
Policy EC3.6 (PPC32)	VP ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW – CARDIFF EAST – PYLE & CARDIFF EAST - USKMOUTH – WHITSON
Policy EC3.9 (PPC32)	XM ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE & ABERTHAW - TREMORFA
Policy EC3.23 Existing Employment Land (PPC32)	VP ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW – CARDIFF EAST – PYLE & CARDIFF EAST - USKMOUTH - WHITSON
Policy EC3.25 Existing Employment Land (PPC32)	VP ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW – CARDIFF EAST – PYLE & CARDIFF EAST - USKMOUTH - WHITSON
Policy SP1 – Housing commitments over 100 dwellings	VP ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW – CARDIFF EAST – PYLE & CARDIFF EAST - USKMOUTH - WHITSON

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.

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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.

Proposed Development Site Allocations or Designations 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 Representation on behalf of NGET

A Representation was submitted to the Council's 'Replacement Local Development Plan 2021 – 2036' Consultation on the 04 April 2025. This response set out the following for the sites identified to conflict with NGET assets listed in the table above:

> *"Without appropriate acknowledgement of the NGET assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure.*
>
> *We propose modifications to the above site allocations and/or policies to include wording to the following effect. We propose that these modifications are applied to each of the aforementioned site allocations affected by NGET assets.*
>
> *Development proposals will include a strategy for responding to the National Grid Overhead Cable Route present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."*

The below table summarises changes made to the affected sites as a result of the Examination Schedule. Commentary follows this.

Deposit Plan Site	Adjustment in Schedule of Proposed Changes
Policy EC2 - adding Land south of St Mellons Business Park	Context of Call-In from Welsh Government added at (PPC55) Removed as an allocation at PPC32 and subsequently from Policies Map at (MAC PM5 A) Added to Protected Employment Land and Premises (EC3) at (PPC32) and **designated as EC3.6** Added to Policies Map as Protected Employment Land at (MAC PM5B)
Policy EC3.3 - Rover Way	Unchanged
Policy EC3.6 -Cardiff Gate Business Park	Converted to **EC3.7** at (PPC32) as a result of adding Land south of St Mellons Business Park
Policy EC3.9 - Green Meadow Springs	Converted to **EC3.10** at (PPC32) as a result of adding Land south of St Mellons Business Park

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Policy EC3.23 - Ipswich Road	Converted to **EC3.24** at (PPC32) as a result of adding Land south of St Mellons Business Park
Policy EC3.25 - Eastern Avenue	Converted to **EC3.26** at (PPC32) as a result of adding Land south of St Mellons Business Park
Policy SP1 – Housing commitments over 100 dwellings	Updated and renumbered via PM7B-I

Policy EC2 - Land south of St Mellons Business Park, Policy EC3.3, EC3.6 EC3.9, EC3.23, EC3.25 & Policy SP1 – Housing Commitments over 100 Dwellings

It is understood the designation of EC2 as an area of Protected Employment Land (now EC3.6) has resulted in subsequent alterations to sites references contained within Policy EC3. In addition, there have been no material changes to Policy EC3.3 or Policy SP1 that satisfy NGET's initial objections.

In the case of EC2 (now EC3.6), regardless of its alteration to an area of Protected Employment Land, it is a fact that the site interacts with an NGET Overhead Transmission Line that will encumber its development (Reference Figure 1). Therefore NGET continue its objection and consider the Local Plan would strongly benefit from policy wording ensuring conflict between the allocation and asset is avoided.

The same should apply to Site's EC3.3, EC3.6 (now EC3.7), EC3.9 (now EC3.10), EC3.23 (now EC3.24), EC3.25 (now EC3.26) & Policy SP1 – at the site north of St Mellons Road (Reference Figures 2-7) and NGET must continue to object until wording suggested at the Deposit Plan stage (*Red Italics*) is included for all of the above. Without this wording, the policies may not be effective and deliverable as proposed, unencumbered by the constraints posed by the presence of NGET assets.

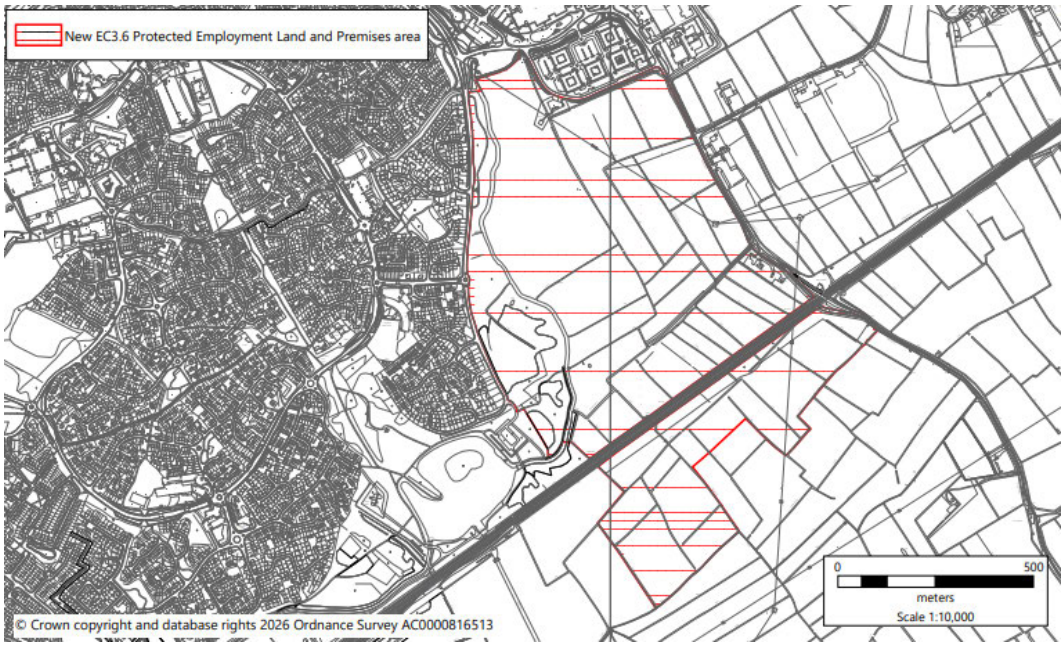


Figure 1: OHL interaction with EC3.6 (adjusted from EC2)

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Figure 2: OHL, Substation & Freehold interaction with EC3.3

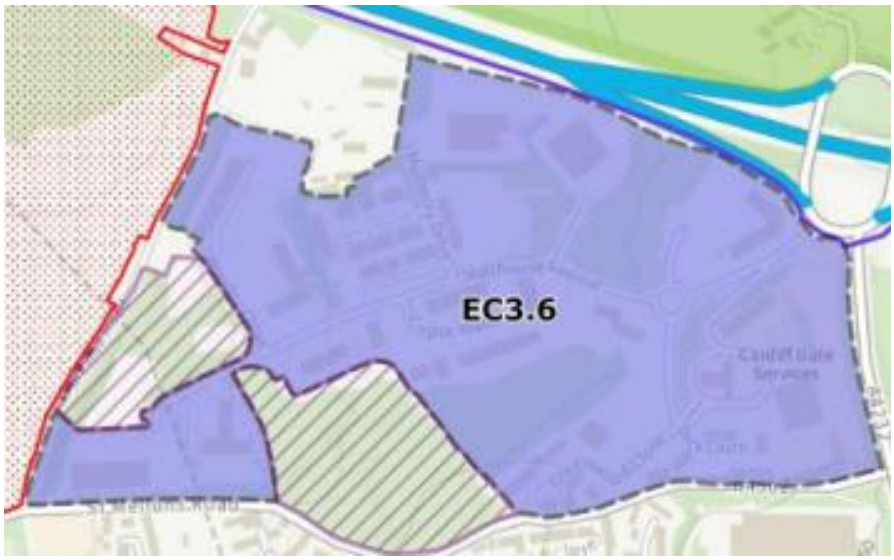


Figure 3: OHL interaction with EC3.6 (which is now EC3.7)



Figure 4: OHL interaction with EC3.9

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Figure 5: OHL interaction with EC3.23



Figure 6: OHL interaction with EC3.25

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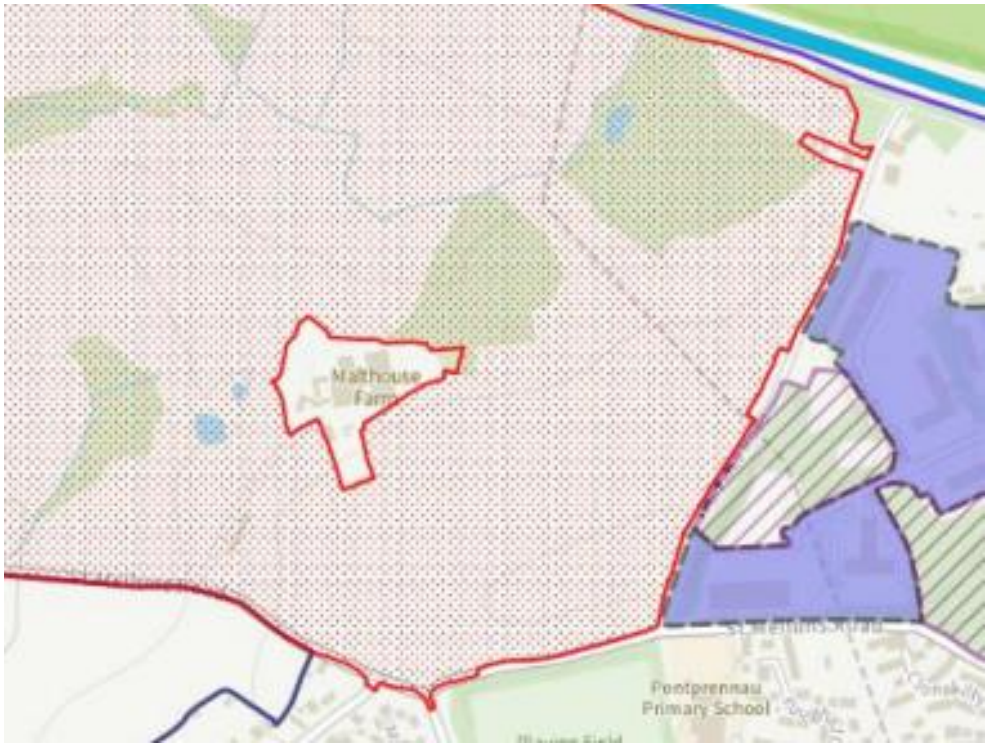


Figure 7: OHL interaction with Policy SP1 – Housing Commitment over 100 Dwellings

New Infrastructure

Currently there are no known new infrastructure interactions within the area, however 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 electricity is generated in the UK is changing rapidly, and NGET is evolving its network to accommodate 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.

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- **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

ngplanning@fishergerman.co.uk

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Tiffany Bate, 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,

[redacted]

Angela Brooks MRTPI
Partner

For and on behalf of Fisher German LLP

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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.

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

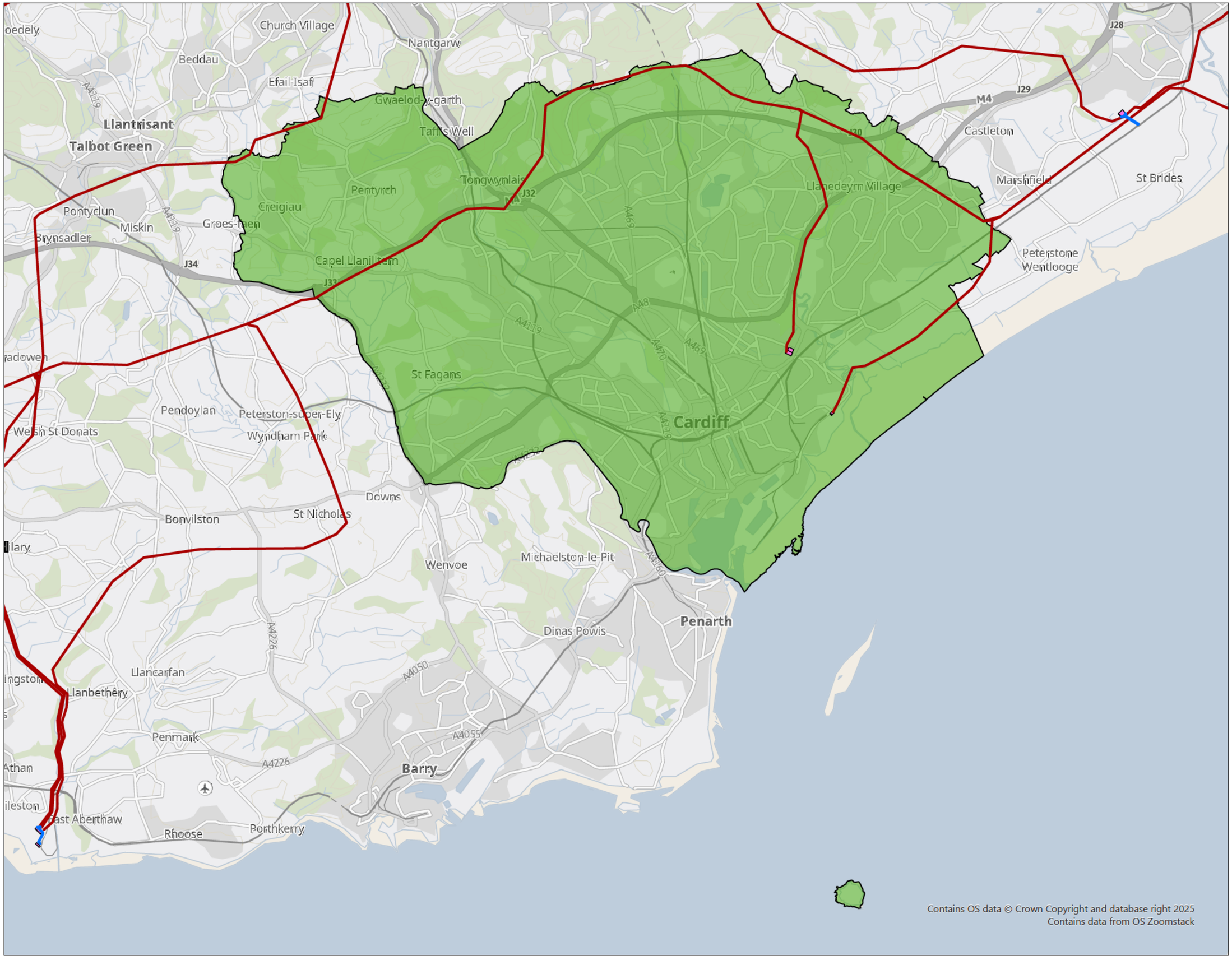
Regen, in partnership with the Department for Energy Security and Net Zero (DESNZ) have produced guidance for LPA's on assessing electricity network infrastructure applications. This is intended to be used as a practical tool for officers and details various legislative frameworks and infrastructure 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: ngplanning@fishergerman.co.uk

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Kilometers

OVERVIEW WINDOW



LEGEND:
- Cable
- OHL
- Substation
- LPA Area

REVISION: A

CLIENT: nationalgrid

SCHEME:
PLANNING INTERACTION

TITLE:
LPA ASSET INTERACTION

FP: 105181-024

SCALE: 1:83,000 @ A3
DATE: 05/03/2025

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NG-2025-03-MT-OP-LPA- Cardiff