

**Name of the Local Plan to which this representation relates:**

Milton Keynes City Plan 2050

Please return by **5.30pm on Monday 22<sup>nd</sup> December 2025** to Development Plans, Milton Keynes City Council, Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ, or via email at [ncp.engagement@milton-keynes.gov.uk](mailto:ncp.engagement@milton-keynes.gov.uk)

This form has two parts –

**Part A** – Personal Details: need only be completed once.

**Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A**

**1. Personal Details\***

**2. Agent's Details (if applicable)**

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)*

*boxes below but complete the full contact details of the agent in 2.*

Title

Mrs

First Name

Lucy

Last Name

White

Job Title  
(where relevant)

Director

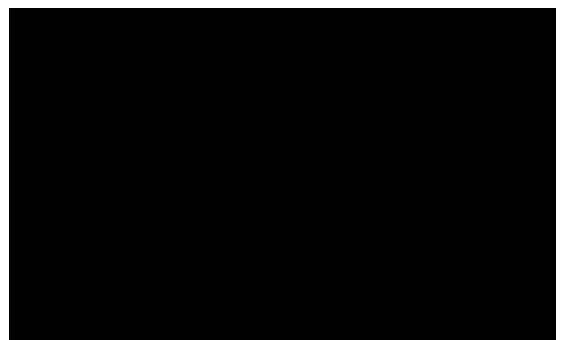
Organisation  
(where relevant)   
National Grid Electricity  
Distribution (East Midlands)  
Plc

Lucy White Planning Limited

E-mail Address

Address Line 1

Line 2

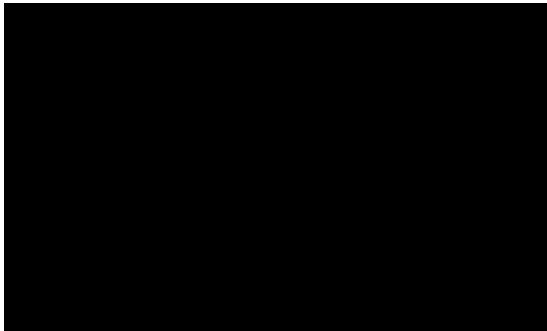


Line 3

Line 4

Post Code

Telephone Number



**Part B – Please use a separate sheet for each representation**

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input checked="checked" type="checkbox" value="x"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="checked" type="checkbox" value="x"/>	No	<input type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="checked" type="checkbox" value="x"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached letter.

(Continue on a separate sheet /expand box if necessary)

**Please note** your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

### **Sharing your personal details**

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Proposed Submission period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the Council and the Inspector and respondents and the Inspector.

For more information on how we use your data – please see our privacy notice by using the following link: <https://www.milton-keynes.gov.uk/milton-keynes-council/privacy-notice/milton-keynes-city-council-corporate-privacy-notice>

**Representations cannot be treated as confidential and will be published on our website alongside your name.** *If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online.*

Your Ref:  
Our Ref: LWP71



Lucy White Planning Limited

By email: [ncp.engagement@milton-keynes.gov.uk](mailto:ncp.engagement@milton-keynes.gov.uk)

19 December 2025

Dear Sirs,

**MILTON KEYNES PRE-SUBMISSION LOCAL PLAN (OCTOBER 2025) - REPRESENTATIONS ON BEHALF OF NATIONAL GRID ELECTRICITY DISTRIBUTION (EAST MIDLANDS) PLC**

These representations are prepared on behalf of National Grid Electricity Distribution (East Midlands) Plc (NGED) (formerly Western Power Distribution (South West) Plc), in response to the Milton Keynes Local Plan Pre-Submission (October 2025), which is subject to public consultation.

**Introduction**

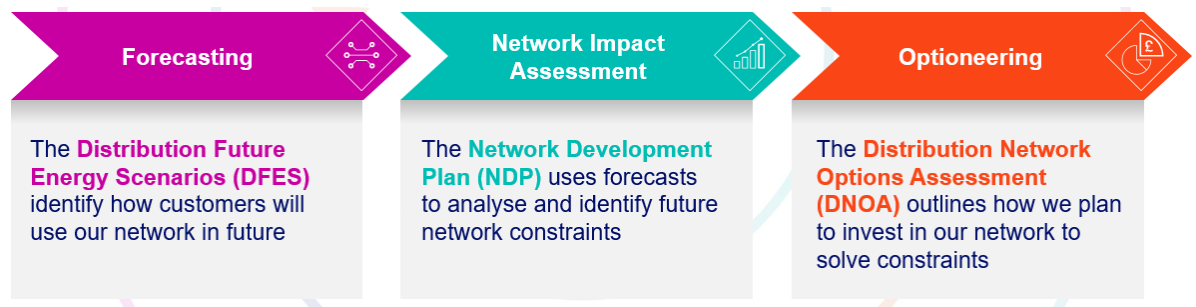
NGED owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers.

In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid's infrastructure to enable NGED to supply electricity in the most efficient and cost effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons.

***Towards Net Zero***

The Government is committed to achieve net zero by 2050. The shift towards electricity to heat our homes and power our cars is critical to achieving this goal and the National Grid is playing a crucial role in meeting this commitment by increasing capacity to meet the growing demand for electricity.

Our network investment planning process is the strategic approach we are taking to investing in our network, ensuring that it can meet future demand in the right place, at the right time while ensuring good value for money for customers.



To ensure that we can provide the network you need from us, your projects need to be included in our Distribution Future Energy Scenarios (DFES). We use this information to predict the future requirements on our network and decide when and where to invest in the network. This ensures that our strategic network planning provides sufficient network capacity as the country transitions to net zero.

We ask Local Authorities about their future plans, including information in your Local Plan annually (normally in May - July). This will inform our future forecasts down to Electricity Supply Area level ensuring we can connect new developments in 5 years and beyond.

NGED strongly recommends that local planning authorities feed into the DFES process on an annual basis, to ensure they have your most current growth plans and ambitions. NGED can tell you when your LPA last submitted data to DFES, by emailing [nged.energyplanning@nationalgrid.co.uk](mailto:nged.energyplanning@nationalgrid.co.uk).

The DFES informs planning of the network beyond 3 to 5 years into the future (post 2030). If you have a development that needs a connection sooner, please contact NGED as soon as possible to have a discussion with them about securing a connection. A 'connections surgery' can be arranged to discuss any developments you would like to connect, by emailing [nged.newsupplies@nationalgrid.co.uk](mailto:nged.newsupplies@nationalgrid.co.uk). NGED cannot guarantee capacity until a formal connection offer has been requested, issued and accepted.

### **132kV Overhead Lines**

Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) supported by wooden poles can normally be undergrounded or diverted without significant concern. However, where land allocations affect lines supported by steel lattice towers, particularly 132kV, the LPA are advised to engage with NGED at the earliest opportunity in the plan-making process to confirm:

- a) whether the lines can be accommodated within the development site; or
- b) the viability and feasibility of diverting and/or undergrounding overhead lines.

This includes, where relevant, ensuring the agreement of third party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and NGED to appropriate wording within the allocation policy.

In allocating land affected by high voltage power lines, the LPA should take into account the additional costs involved in their diversion and/or undergrounding, the need for additional new infrastructure and its visual impact, including larger terminal towers at either end of an undergrounded line, and the potential impact on timescales for delivery of the development.

LPAs should also be aware that where high voltage electricity lines are undergrounded National Grid is unable to support any development which could affect the operation of or obstruct the line, including buildings, tree planting, public highway or attenuation features. A 10m wide corridor of open ground is required above the undergrounded cables. Accordingly, the retention of overhead lines in situ provides greater opportunities to deliver an efficient and effective masterplan, with the potential to deliver a range of uses beneath the lines including green infrastructure, public highway, drainage features and some biodiversity net gain measures.

NGED cannot be held accountable for the absence of a planned solution for a proposed diversion route or undergrounding of an overhead power line or any subsequent reduction in the allocation site's development capacity, where the LPA and/or developer/landowner has not agreed proposals with NGED prior to the adoption of the Local Plan.

### ***Planning for reinforcement***

Reinforcement planning is crucial for future growth. As NGED's Network Development Plans identify the need for new substations and other assets to meet future electricity demands, LPAs should collaborate with NGED on suitable locations. Land for these substations should be safeguarded through the Local Plan, with substation delivery timescales factoring into the LPA's housing trajectory.

NGED cannot comment on network capacity for developments beyond five years. To ensure future capacity, LPAs must engage in the Distributed Future Energy Scenarios (DFES) process and review Network Development Plans to confirm their projected growth is included in NGED's plans.

### ***Summary***

NGED does not object to the allocation of land upon which its infrastructure is present, however, in the context of the Government's commitment to reach Net Zero by 2050 and the role which National Grid has to play in delivering significant new infrastructure to meet existing and future energy demands, all reasonable efforts should be made by LPAs and developers to safeguard to retain the existing grid infrastructure and the associated embodied carbon.

In preparing Local Plans, LPAs should take the following steps:

1. Ensure your LPA is responding annually to our Distribution Future Energy Scenario questionnaire that is sent out via Regen;
2. For developments that require a connection to the distribution network within the next 5 years, contact NGED as early as possible to arrange a Connections Surgery. The surgery will help you understand the timescales and costs associated with delivering the planned development;
3. Where land is allocated, priority should be given to retention of high voltage overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land;
4. Where necessary, early engagement with NGED to establish whether its infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible;

5. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above;
6. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines and safeguarding of land to accommodate new sub-stations, where necessary, with the agreement of NGED.

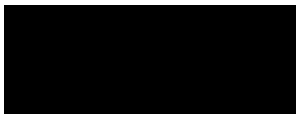
### **Policies INF1 and INF2**

NGED has no objection to the plan, there are no allocations affected by 132kV overhead lines except the Western Gateway which is carried forward from the adopted Local Plan. NGED supports the “infrastructure first principles” of Policy INF1 and accompanying IDP, as drafted, subject to the above considerations. In this regard, it would be helpful to recognise through Policy INF1 and INF2 that existing infrastructure such as overhead powerlines and sub-stations should be safeguarded in situ, wherever possible.

We support the provisions of Annex E which recognise the critical importance of electrical energy distribution to unlock sites (Table 2) and

Should you have any queries regarding the matters above, please do not hesitate to contact me.

Yours sincerely,



**Lucy White B.Sc. (Hons) DipTP MRTPI**  
**Director**

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First Name

Lucy

Last Name

White

Job Title  
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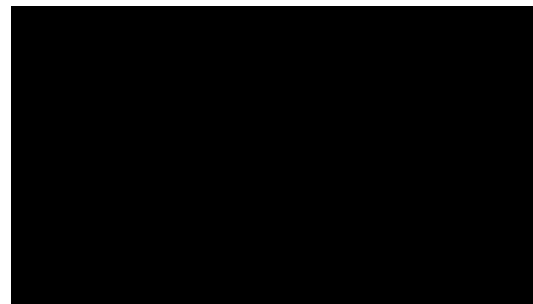
National Grid Electricity  
Distribution (East Midlands)  
Plc

Lucy White Planning Limited

E-mail Address

Address Line 1

Line 2



Line 3

Line 4

Post Code

Telephone Number



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