

**Matter 8: Managing the built and natural environment – Policy DM16:  
Biodiversity**

**Written Statement by AMEC on behalf of National Grid**

**Introduction**

This written submission has been prepared by AMEC on behalf of National Grid who own and operate Mill Hill substation. The submission relates to Policy DM16: Biodiversity.

National Grid made a representation to the Submission Development Management DPD, and has made previous representations to the Core Strategy identifying the importance of Mill Hill substation.

It is within this context that we wish to make the following submission in response to the questions set out by the Inspector. The submission builds on our previous representation to the Development Management DPD.

It has been agreed with the Programme Officer that National Grid's submission can be considered under Matter 8 of the Examination, and although the comments do not specifically fit under any of the questions, it has been agreed that these could be dealt with under Question 4.

**Is the policy justified, effective and consistent with national policy? Is it the most appropriate strategy when considered against the reasonable alternatives?**

National Grid wish to make the following comments under Question 4:

**4. Are the measures to protect the Green Belt, Metropolitan Open Land, promote improvements and tackle public open space deficiency and under provision sufficiently clear and appropriate? Is it necessary to clarify the very special circumstances for development in the Green Belt and the exceptional circumstances for development on open spaces?**

**Mill Hill Substation Pastures: Site of Metropolitan Importance for Nature Conservation**

National Grid owns and operates Mill Hill substation. Substations are vital to the efficient operation of the national electricity transmission network for switching circuits or transforming voltage. Mill Hill substation forms an essential part of the national electricity transmission network and plays an important role in maintaining the supply of electricity to the local distribution network operator and therefore ultimately to homes and businesses throughout Barnet and the wider area.

National Grid's land holdings at the substation are shown by the red boundary on the plan provided in Appendix A (the footprint of the actual substation compound where our equipment is situated is indicated by the violet boundary). All of the land presently in our ownership is classed as "operational land" (in accordance with the General Permitted Development Order 1995, Schedule 2, Part 17, Class G, particularly para G.5 and Section 263 of the Town and Country Planning Act 1990)

and National Grid therefore benefits from permitted development rights on its operational land.

Mill Hill Substation Pastures is identified as a Site of Metropolitan Importance for nature conservation in the Development Management Policies Submission Draft document. As shown on the plan enclosed, the operational land (i.e. our land holdings shown by the red boundary) covers essentially the whole Mill Hill Substation Pastures site.

#### Future Development at Mill Hill Substation

Mill Hill substation presently forms part of the 275kV electricity transmission network within London and the wider area. National Grid is required to review and react to changing patterns of electricity demand and generation. In view of anticipated changes in electricity generation (e.g. major new generators being installed in the North and Scotland) and demand (e.g. continuing growth in demand in London and the South East), there may be a need for reinforcements of the electricity transmission network.

Given its role in the national transmission network, the need for network reinforcements may require future development at Mill Hill substation. Whilst no detailed plans exist at this stage, such works may require an expansion of the footprint of the substation buildings (i.e. installation of equipment outside the violet boundary on the plan). Such works would be carried out in the first instance within the boundary of our existing operational land (i.e. within the red boundary), where National Grid would benefit from permitted development rights. The need to be able to allow future development and expansion is one of the main reasons for holding a reserve of operational land around substations.

In planning and carrying out works, National Grid always seeks to minimise the impact of development on the environment and communities. Indeed, under Section 38 and Section 9 of the Electricity Act 1989, National Grid has a duty to:

*"have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and shall do what it reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on such flora, fauna, features, sites, buildings or objects."*

National Grid has a stakeholder, community and amenity policy which sets out our commitments when undertaking electricity and gas works in the UK. It covers how we will meet our amenity responsibilities and our commitments to effectively involving stakeholders and communities. We interpret amenity to mean the natural environment, cultural heritage, landscape and visual quality. We also include within this interpretation the impact of our works on communities, such as the effects of noise and disturbance from construction activities.

In undertaking any future work at Mill Hill substation we would work together with Barnet London Borough Council, and seek to minimise, mitigate or offset any adverse impacts in accordance with our statutory obligations and amenity policy.

### Policy DM16: Biodiversity

Policy DM16: Biodiversity of the Development Management Policies Submission Draft document states that where development will affect a Site of Importance for Nature Conservation the Council will expect the proposal to meet the requirements of London Plan Policy 7.9E.

It should be noted that the relevant policy in the Adopted London Plan (July 2011) is now Policy 7.19E.

### Recognition of Potential Future Development Needs at Mill Hill Substation in the LDF

National Grid is required to review and react to changing patterns of electricity demand and generation. In addition, work will be required at substations at certain intervals to maintain and replace existing apparatus that reaches the end of its operational life. Should the need arise to expand or develop the Mill Hill substation site, then National Grid would not wish to be restricted in carrying out such essential work that is required to maintain a reliable, efficient and economic electricity supply.

As worded, the Policy DM16 would allow development at the Mill Hill Substation Pastures site only in exceptional circumstances, where development is judged to outweigh biodiversity impacts. Therefore, the policy is not flexible enough to respond to changes in circumstance such as potential demand for essential utility infrastructure development on the electricity transmission network.

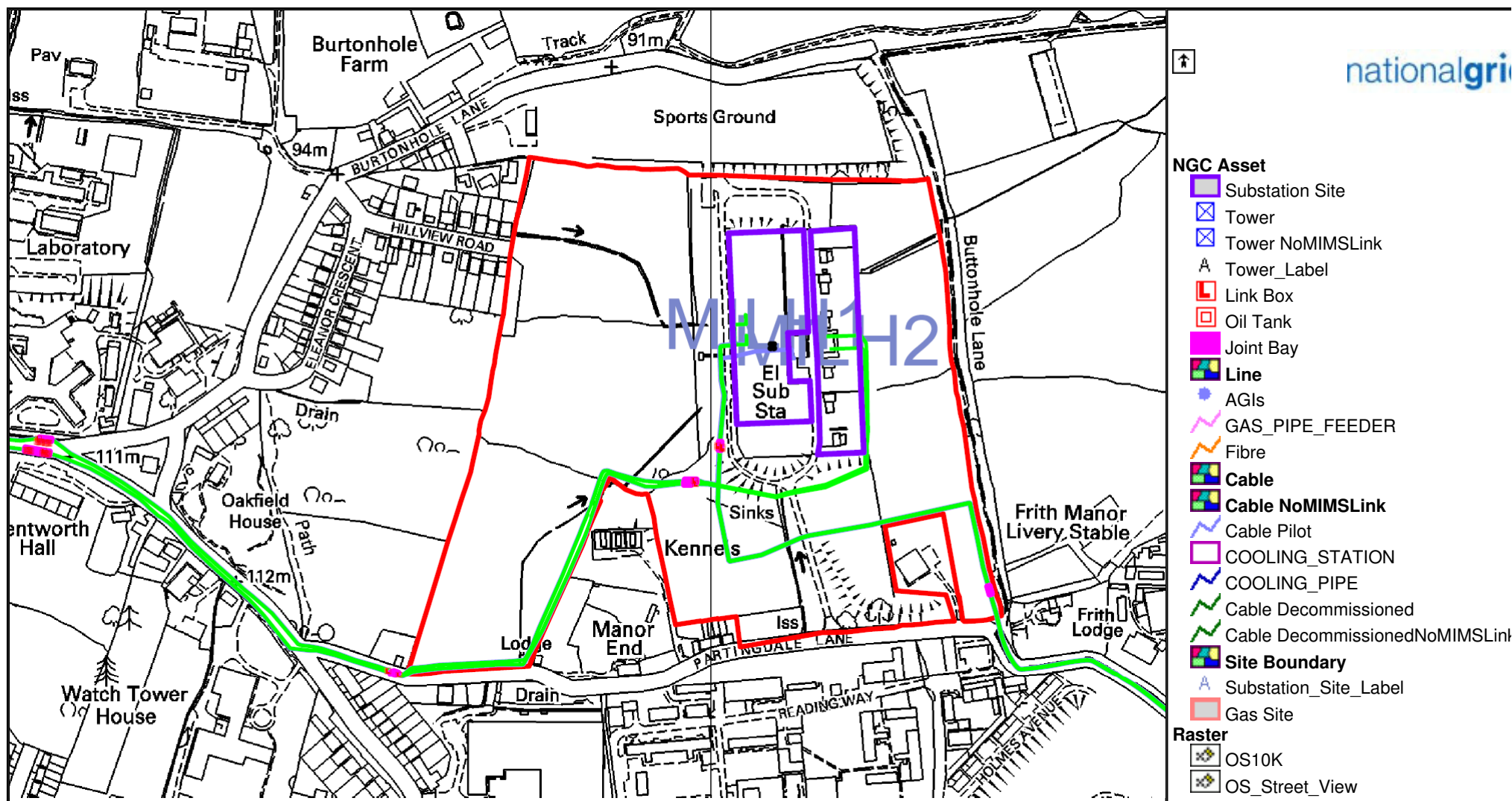
National Grid therefore seeks assurance that the designation of Mill Hill substation will not restrict them from extending or developing the substation if necessary or inhibit any future operational requirements that may be placed upon them. This should be recognised explicitly in the supporting text of the Development Management Policies DPD.

In order to address this, additional wording should be inserted after paragraph 17.1.6 as follows:

*The provisions of this approach do not intend to preclude the possibility of essential strategic infrastructure expansions.*

The same wording is used in the Development Management DPD prepared by South Tyneside Council where similar issues around the designation of land around an electricity transmission substation have arisen. It is our considered view that such wording would provide clarity and enable essential infrastructure development which may be required at Mill Hill in the future.

**Appendix A**  
**Plan of Mill Hill Substation**



400 m

1 : 5429

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