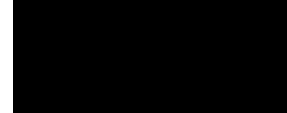


Your Ref:
Our Ref: LWP71



East Devon Council
Blackdown House
Border Road,
Heathpark Industrial Estate
Honiton
Devon
EX14 1EJ

Lucy White Planning Limited



Submitted online

28 March 2025

Dear Sirs,

THE EAST DEVON PRE-SUBMISSION LOCAL PLAN (FEBRUARY 2025) REPRESENTATIONS ON BEHALF OF NATIONAL GRID ELECTRICITY DISTRIBUTION (SOUTH WEST) PLC

These representations are prepared on behalf of National Grid Electricity Distribution (South West) Plc (NGED) (formerly Western Power Distribution (South West) Plc, in response to the Regulation 19 East Devon Local Plan 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.

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 and the potential impact on timescales for delivery of the development.

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.

In light of the above, NGED does not object to the allocation of land upon which its infrastructure is present, subject to the following steps being taken by the LPA in preparing the Local Plan:

1. Priority should be given to retention of 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.
2. Early engagement with NGED to establish whether its infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible;
3. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above.
4. 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, with the agreement of NGED.

Strategic Policy WS01

The Local Plan allocation for the proposed new community of circa 8,000 dwellings is traversed by NGED's Exeter Main 132kV line, a strategically important electricity supply line within East Devon. This infrastructure serves thousands of residents and businesses in the Exeter area and is critical to maintaining supply in the short, medium and long-term. Any proposals to divert or underground this line would be highly challenging and disruptive to supply and NGED would object to development proposals which are reliant upon such works.

NGED has licence obligations to operate the network economically and efficiently. Therefore NGED's preference is for the overhead line to remain in situ and any proposals for a new settlement to be designed around them. The retention of the strategically important Exeter Main SGP and distribution station is critical to maintaining the city's electricity supply and cannot be prejudiced by development proposals which would themselves place a significant additional burden on the electricity supply. Moreover, it is not always possible to divert 132kV lines and if a diversion were possible, it would need to accommodate two larger terminal towers and a 10m wide corridor above the undergrounded

cables, which would be required to remain open land. Such land is unsuitable for buildings, public highway and any other development which would obstruct access to the cables. Early consideration of the overhead lines in the masterplanning process can enable the lines to be sensitively and efficiently designed into the development.

NGED alerted East Devon Council to the presence of the line and its requirements at the Regulation 18 stage. Strategic Policy WS01 does not refer to the existing electricity infrastructure or the need to safeguard this infrastructure through the development of the new community. NGED notes and welcomes the policy requirement for an allocation-wide masterplan, Infrastructure Delivery Strategy and Phasing Plan to be submitted and approved prior to commencement of any development. To ensure the masterplanning process is effective in safeguarding the existing electricity infrastructure, Policy WS01 should be amended to include reference to the 132kV lines and the need to incorporate the lines in situ through the masterplanning exercise. NGED also notes that around 150 hectares of land will be required as Suitable Alternative Natural Greenspace (SANGs) to meet Habitat Regulations requirements. Land beneath overhead powerlines could be utilised for SANGs and other biodiversity net gain enhancements.

Strategic Policy WS10 – Development Next to the M5 and North of Topsham

The employment and housing allocation for 596 homes and 2.4 hectares of employment plus community facilities is intersected by the 132kV overhead electricity line to the south of the allocation site.

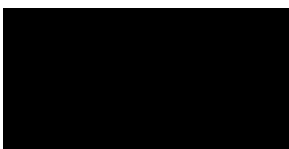
The allocation policy makes no reference to the overhead line or the need to safeguard the line, retaining it in situ throughout the development. NGED welcomes the policy requirement for an agreed masterplan to be established for the whole site before any development parcels can be brought forward for development. To ensure the effectiveness of the policy to safeguard electricity infrastructure through this masterplan, specific reference should be made to the need to retain the infrastructure in situ.

NGED reserves the right to comment further on the policy for the new community through the second phase of the Regulation 19 consultation.

For accuracy, please refer to NGED as National Grid Electricity Distribution throughout the Local Plan documentation. The organisation is no longer referred to as Western Power Distribution.

I trust you find the above comments helpful and constructive. NGED would be willing to meet with Officers to discuss the proposals for the new settlement in further detail if that would be helpful. If you would like to arrange a meeting, please contact me to discuss further.

Yours sincerely,



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