

Filtered Data Export

Full name: Lucy White

Organisation (where relevant): Lucy White Planning Limited

Other party name (if relevant): National Grid Electricity Distribution Plc (NGED)

Proposal:

4. Development at the West End

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here.:
Marlcombe

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

THE EAST DEVON PRE-SUBMISSION LOCAL PLAN SECOND CONSULTATION (DECEMBER 2025) REPRESENTATIONS ON BEHALF OF NATIONAL GRID ELECTRICITY DISTRIBUTION PLC These representations are prepared on behalf of National Grid Electricity Distribution Plc (NGED)(formerly Western Power Distribution Plc, in response to the updated Regulation 19 East Devon Local Plan which includes further details regarding the proposed new community and amendments to the plan consulted upon in February 2025. These representations should be read in conjunction with NGED's representations dated 28 March 2025. Strategic Policy WS01: Development of Marlcombe new community East of Exeter NGED has no objection to the proposed new community subject to appropriate allowances for reinforcement and connections to the existing grid and associated phasing to serve the development in a timely manner. We welcome the Marlcombe Masterplan at Figure 7 which plans for areas of open space and undeveloped land along the existing route of the overhead lines. NGED also supports the location of the sub-station in close proximity to the 132kV overhead line to the east of the new community and the explicit policy requirement for at least 1 hectare of serviced land for electricity reinforcement provision in close proximity to the existing 132kV network. Additional 33/11kV primary sub-stations are likely to be required to serve the new community and allowances should be made within the masterplan to accommodate these. Proximity of the new Bulk Supply Point to the AC route (~AC27-32 is a key consideration in the masterplanning and NGED welcomes the opportunity to discuss this further with East Devon. NGED supports the findings of the Utilities Due Diligence Report prepared by Hydrock in 2022 which recognised that it would be most cost effective to retain the 132kV overhead lines in situ.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

However, “A Vision for Marcombe” (September 2025) is ambiguous and therefore ineffective and unjustified. It states that the masterplan has taken existing utilities crossing the site into consideration through the masterplan to “mitigate excessive costs and substantial relocations, including the 32kV1 overhead line, with required maximum safety distance between 20.5 – 29.5m” (paragraph 2.5 Utilities). However, the accompanying Utilities Constraints Plan (page 8) is annotated stating “electricity and telecom overhead lines – to be diverted and undergrounded through the development masterplan where possible. Alternatively, around the proposed red line boundary.”

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The Utilities Constraints Plan should be amended to reflect paragraph 2.5, confirming that 132kV overhead lines would be retained in situ, unless NGED agree that diversion is appropriate to achieve the necessary reinforcement of the existing infrastructure. Otherwise, undergrounding/diversion should be limited to lower voltage lines, in consultation with NGED. As outlined in NGED’s March 2025 representations, the 132kV overhead lines form part of the strategically important electricity infrastructure serving Exeter and East Devon. Any plan to divert or underground any part of the lines would be highly challenging and disruptive to supply. Any such proposal by the developers should only be proposed if expressly agreed with NGED and undertaken at the developers’ cost. 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.

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1(c). If the comment is related to a site, please state the site reference here::
Marlcombe

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See attached representations.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See attached representations.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To enable NGED to represent its interests in respect of the new community, if appropriate.