

Your Ref:  
Our Ref: LWP71



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

Lucy White Planning Limited  
49 West Town Road  
Backwell  
BS48 3HG

Submitted online

21 January 2026

Dear Sirs,

**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 Marcombe 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 Marcombe 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.

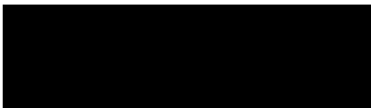
NGED supports the findings of the Utilities Due Diligence Report prepared by Hydrock in 2022 which recognised that it would be most cost effective to retain the 132kV overhead lines in situ. However, "A Vision for Marcombe" (September 2025) is ambiguous and therefore ineffective and unjustified. It states that the masterplan has taken existing utilities crossing the site into consideration through the masterplan to *"mitigate excessive costs and substantial relocations, including the 32kV<sup>1</sup> 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."* 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.

Yours sincerely,



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

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<sup>1</sup> This is assumed to be a typo and should refer to 132kV