

Exeter Plan 2021-2041

Publication Stage (Regulation 19)

Representation Form

Ref:

**(For official
use only)**

Name of the Local Plan to which this representation relates: Exeter Plan 2021-2041

Please return to Exeter City Council, Local Plans Team, Paris Street, Exeter, EX1 1JN, upload onto our consultation portal at <https://exeterplanpublication.commonplace.is/> or email to planning.policy@exeter.gov.uk by **11:59 pm on 6 February 2025**.

This form has two parts:

Part A – Personal Details: Needs to be completed only once.

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

Part A: Personal details

1. Personal details*

*If an agent is appointed, please complete only the Title, Name and Organisation (if application) boxes below but complete the full contact details of the agent in section 2.

Title	Mr
First Name	Nick
Last Name	Buxton
Job Title (where relevant)	
Organisation (where relevant)	National Grid Electricity Distribution (South West) Plc
Address Line 1	c/o agent
Line 2	
Line 3	
Line 4	

Post Code

Telephone number

E-mail address

2. Agent's details if applicable

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone number

E-mail address

Part B – Representation

Please use a separate sheet for each representation

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

Paragraph

Policy

Policies Map

4. Do you consider that this part of the Exeter Plan is legally compliant?

Yes

No

4 (a). If yes, and you wish to support the legal compliance of this part of the Exeter Plan, please use this box to set out your comments.
(Continue on a separate sheet if necessary)

4 (b). If no, please give details of why you consider this part of the Exeter Plan is not legally compliant. Please be as precise as possible.
(Continue on a separate sheet if necessary)

4 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan legally compliant, in respect of any legal compliance matters you have identified at 4(b) above. You will need to say why each modification will make this part of the Exeter Plan legally compliant. 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.
(Continue on a separate sheet if necessary)

5. Do you consider that this part of the Exeter Plan is Sound?

Yes ☒

No ☐

5 (a). If yes, and you wish to support the soundness of this part of the Exeter Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

Please see comments in attached letter.

5 (b). If no, please give details of why you consider this part of the Exeter Plan is unsound. Please be as precise as possible.

(Continue on a separate sheet if necessary)

5 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan sound, in respect of any soundness matters you have identified at 5(b) above.

You will need to say why each modification will make this part of the Exeter Plan 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.

(Continue on a separate sheet if necessary)

Please see attached letter.

6. Do you consider that this part of the Exeter Plan complies with the Duty to Co-operate?

Yes ☒

No ☐

6 (a). If yes, and you wish to support this part of the Exeter Plan's compliance with the duty to co-operate, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

6 (b). If no, please give details of why you consider this part of the Exeter Plan fails to comply with the duty to co-operate. Please be as precise as possible.
(Continue on a separate sheet if necessary)

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

7. If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.
(Continue on a separate sheet if necessary)

n/a

8. If you would like to make representations on the Habitats Regulation Assessment (HRA) please provide your comments here, stating to which part of the HRA your comments relate.
(Continue on a separate sheet if necessary)

n/a

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

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

9. 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)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

(Continue on a separate sheet if necessary)

To provide evidence to the examining Inspectors of the limited capacity of the electricity grid, the necessary infrastructure to improve capacity, the timescales for delivery and the implications for housing delivery.

Please note the Inspector will determine the most appropriate procedure to adopt 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.

For more information on how we use your data – please read our privacy notice at the following website: <https://exeter.gov.uk/media/5750/planning-policy-privacy-notice.pdf>

Your Ref:
Our Ref: LWP71



By email only: planning.policy@exeter.gov.uk

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

5 February 2025

Dear Sirs,

EXETER LOCAL PLAN REGULATION 19 - 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 Exeter Local Plan 2021-2041, which is subject to public consultation.

Introduction

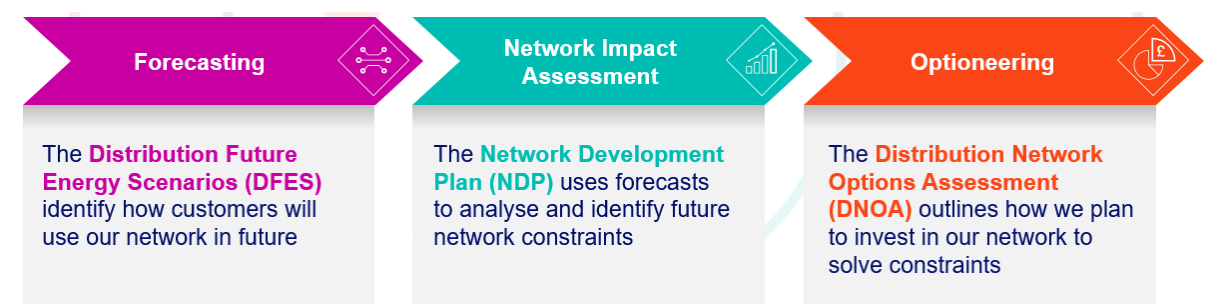
NGED owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers.

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. 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/June). 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 ensure that they feed into the Distribution Futures Energy Scenario process by emailing [REDACTED] and that you contact them at the earliest possible opportunity for confirmation of the National Grid's capacity to accommodate planned growth in their area. If capacity is limited, LPAs should explore alternative locations for growth which may be less constrained or allocate land, in consultation with NGED, to accommodate a new sub-station. NGED should also be involved in the masterplanning of any development allocation which includes a large sub-station.

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.

National Grid Capacity

In light of the above, NGED requires LPAs to make early enquiries to ensure the National Grid has sufficient capacity to accommodate planned growth. If electricity capacity is limited, the LPA should engage with NGED to ascertain whether a new sub-station can be introduced to increase capacity and if so, where this should be located. Land should be safeguarded for the sub-station through the Local Plan. The timescales for delivery of a new sub-station and the implications for occupation of new homes should be taken into account in preparing the LPA's housing trajectory.

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 Local Authority is responding annually to our Distribution Future Energy Scenario questionnaire that is sent out via Regen.
2. Contact NGED as early as possible in the Plan making process to establish whether capacity exists in the grid to accommodate 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.

Policy H1 – Housing Requirement

Policy H1 establishes the housing requirement of 13,975 homes to be delivered over the plan period. NGED has advised Exeter City Council of the limited capacity available within the existing grid network to serve new development in Exeter. The remaining capacity has largely been reserved by committed developments. Future planned developments, including proposed allocations and sites subject to planning permission, are reliant on retention of existing infrastructure and the delivery of major new infrastructure to maintain and increase capacity within the grid.

To ensure the Local Plan is effective in delivering housing development, in accordance with Policy H1, its policies must ensure that existing grid infrastructure is safeguarded and the provision of new infrastructure including overhead lines, which will be critical to the delivery of increased power supply, are supported.

The Infrastructure Delivery Plan identifies the critical infrastructure which must be delivered to achieve the necessary enforcements to the national grid to supply future development. The IDP anticipates delivery of the infrastructure at the end of the plan period, between 2036-2041. NGED advises that this is the best case scenario and is subject to identification of suitable locations and approval by the relevant local authorities for the necessary infrastructure.

Prior to completion of these critical works, the delivery of new housing will be severely limited by the capacity of the existing grid network.

In the absence of adequate infrastructure to support the timely delivery of new homes to meet the housing requirement, Policy H1 is ineffective and therefore unsound.

Policy CC3 – Local Energy Networks

NGED does not object to the proposed use of local energy networks for development proposals and development areas within the City. However, the provision of local energy networks remains reliant on availability of capacity within the National Grid. As outlined above, capacity within the National Grid serving Exeter is particularly limited and represents a significant constraint to the delivery of new developments until critical reinforcements of the grid are delivered. The delivery of these reinforcements is not scheduled to take place until at least 2036 – 2041 and these timescales cannot be relied upon until planning permission is secured for the necessary infrastructure.

The provision of local energy networks does not circumvent the need to deliver the necessary grid reinforcements.

NGED appreciates that the limitations within the existing grid network pose a significant constraint to the delivery of new development within the City over the plan period. NGED is willing to work collaboratively with the local planning authority to identify any opportunities to bring forward development, including improvements to the grid, at the earliest opportunity.

Please do not hesitate to contact me if you would like to discuss matters further in the context of the Local Plan.

Yours sincerely,



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