

## **RESPONSE TO 23/00936/MAJ**

### **Matford Home Farm, Matford Mews, Matford, Devon, EX2 8XT**

#### **Construction of a 132Kv-33Kv -11Kv Supply Point Electricity Substation, Operational Electricity Plant, Substation Access Road and Surface Water Drainage Outfall**

#### **SUMMARY**

Exminster Parish Council objects to this Planning Application for the following reasons:

1. It does not meet the requirements of Policy EXM02 Open Countryside of Exminster's Neighbourhood Development Plan.
2. It does not meet the requirements of policies S1, S2, S5, S11 of the Teignbridge Local Plan 2013-2033.
3. It causes a loss of housing land and retail
4. It would be overbearing, adjacent to homes in Matford Lane; the Devon Hotel; stand several metres above the rather beautiful stone buildings which are Matford Mews; and totally spoil the attractive, newly built Elm Park. The development is out of keeping with the character of the area and is especially unsightly on one of the key arterial routes around Exeter from which it will be prominently seen. Walkers in the new Ridgetop Park will also have a clear view of it.
5. Noise or disturbance resulting from use, including the proposed hours of operation.
6. Polluting noise, light and toxic surface water runoff - any pollutants from the sub-station would be drained into Matford Brook and travel through the waterway system in Exminster Marshes and out into the River Exe (contrary to Teignbridge Local Plan Policy S11).
7. Carbon Plan. There are extraordinarily low carbon emissions expected from this sub-station over its lifetime and this should be clarified.
8. Capacity of the physical Infrastructure such as public drainage.
9. Possible adverse health side effects on people that will live next to the substation with published guidance that reasonably practical efforts should be made to site substations distant from homes.

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10. There is a more suitable location only a few hundred metres away in Marsh Barton which is already a commercial / industrial area and where there would be less visual impact, and much less concern over noise from the plant. Alternatively, Exminster Parish Council would support the siting of the substation at Peamore where the emerging TDC Local Plan has allocated 99 hectares to mixed use development. Early identification will enable its appropriate siting during the detailed planning for the Peamore area so that its impact is less. A decision to site at Matford Home Farm condemns the new residential developments to having 120 years or more of a blot on the landscape.

These reasons are further expanded upon in the body of this response.

**Exminster Parish Council believe that the reasons are sufficient for the application to be turned down since it contravenes Parish, Local and National Planning Policy.**

### **Previous Response to 22-DCC-4329-2022**

Exminster Parish Council strongly objected to the original application for this development when first submitted to Devon County Council. There were a significant number of objections from the public. Teignbridge District Council (TDC) objected to the application on 7 February 2023 for a number of reasons. In its objection it also repeated its concern first expressed during the Site Options phase to the site. Exminster Parish Council urge TDC to make the same decision.

### **Request for the application to be decided by the Planning Committee**

Exminster Parish Council request that this application be determined by the TDC Planning committee rather than by delegated authority. The material planning considerations to support this request are:

- Contravention of Exminster Neighbourhood Development Plan policy EXM02
- Contravention of Teignbridge Local Plan policies S1, S2, S5, S11
- Overshadowing/loss of outlook
- Noise and disturbance
- Capacity of physical infrastructure

## Detailed Reasons for Objection

### 1 Exminster Neighbourhood Development Plan

It does not meet the requirements of policy EXM02 (Open Countryside) in the [Exminster Neighbourhood Development Plan](#). The aim of this Policy is to “... *Conserve and enhance wherever possible the rural nature, existing visual landscape quality, wildlife and heritage value of the open countryside of the Parish.*”

It might seem strange to quote this Policy in relation to an urban development, but it is a development which has been designed to respect its surrounding, with good quality housing and a backdrop of the new Ridgetop Country Park.

### 2 Teignbridge Local Plan 2013-2033

Similarly, it does not meet the requirements of the following policies in the [Teignbridge Local Plan 2013-2033](#).

**Policy S1** – Sustainable Development Criteria which states all developments are required to perform well against criteria which include

- d- health, safety and environmental effects
- e- impact on the residential amenity of existing and committed dwellings
- f- impact from existing or committed developments on the health, safety or amenity of occupants
- g- maintenance or enhancement of the character, appearance and historic interest of affected landscapes, seascapes, settlements, street scenes, buildings, open spaces, trees and other environmental assets;

**Policy S2** – Quality Development which states that new developments will be of high-quality design, which will support the creation of attractive, vibrant places with a distinctive character, particularly

- a- integrating with and, where possible, enhancing the character of the adjoining built and natural environment, particularly affected heritage assets;
- b- making the most effective use of the site;
- d- creating inclusive layouts which promote health, well-being, community cohesion and public safety;
- k- respect the distinctive character of the local landscape, seascape, protecting and incorporating key environmental assets of the area, including topography, landmarks, views, trees, hedgerows, wildlife habitats, heritage assets and skylines;
- m- location and scale of Sustainable Urban Drainage Systems.

**Policy S5** - Infrastructure:

- f- ensure that the provision of new infrastructure will only be approved where the planning authority has ascertained that it would not adversely affect the integrity of any European sites; and
- g- all mitigation for impacts to European sites shall be considered as critical in the Infrastructure Delivery Plan and sufficient contributions, to ensure that provisions remain in the long-term, will be taken from the CIL pot for Habitat

Regulations mitigation measures before funding is used for other types of infrastructure.

**Policy S11** – Pollution which states that the impact of noise, air, water, light, land and other forms of pollution will be reduced where possible through planning and other legislation and by joint work with other relevant agencies to:

- a- monitor pollution levels;
- b- prepare strategies and take action to reduce pollution levels in areas of concern that fail relevant legal standards;
- c- guide development and infrastructure provision to seek improvements in pollution levels, implement relevant strategies and avoid creating new areas of concern;
- d- keep vulnerable uses out of areas where they would be harmed by existing pollution levels;

### **3 Loss of Housing land and retail**

Under the SW Exeter Development framework, this area was designed as housing areas and not for an electrical substation. Housing will be lost, and quite probably the much needed affordable homes.

Siting the facility on Matford Home Farm deprives the new householders of the current local businesses that are located at Matford Home Farm, and their reasonable expectation of a development of local shops and businesses to support the 2000 new homes being built in the Parish; this will force residents to travel to buy provisions, causing disruption and unnecessary pollution.

### **4 Visual Impact**

The proposed site for the electricity sub-station and electricity plant is the size of two football pitches, and the built structure would be overbearing. See picture in Annex 1 for the size. Any suggestions that a facility of such size can be disguised with a few trees is wholly misleading. It would be adjacent to homes in Matford Lane; the Devon Hotel; stand several metres above the rather beautiful distinctive stone buildings which are Matford Mews; and totally spoil the attractive, newly built Elm Park.

The development is out of keeping with the designed character of the area (designed to meet the TDC Local Plan policies S1 and S2) and is especially unsightly on one of the key arterial routes around Exeter and from the new Ridgetop Park from which it will be prominently seen.

The layout, density and industrialisation of this development within a green, residential environment are especially repulsive between new and established residential areas. Incredibly, WSP of Bristol report states that the development “...has characteristics in common with its surroundings” and furthermore, “...is set against the backdrop of a major highway and substantial ongoing residential development which serves to further lessen its impact”<sup>1</sup> This is totally disrespectful of current and future householders wishing to make homes and lives for themselves and their families in a semi-rural location.

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<sup>1</sup> South west Exeter Housing Infrastructure Electricity Substation Landscape and Visual Impact Appraisal Nov 2022  
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## 5 Noise

Noise or disturbance resulting from use, including proposed hours of operation. Noise and electromagnetic flux (EMF) pollution and low-level vibrations would be experienced from the 2 enclosures.

WSF of Bristol report that *“...It is expected that a typical enclosure provides approximately 20 dB at 100 Hz. Table 6-1 provides the results of the night-time BS 4142 assessment, which is considered to be worst-case, with 20 dB attenuation applied.”* It isn't clear how far away from the two transformers and electricity plant householders ought to be located and be assured of a healthy living environment in which they will be safe from electro magnet flux and the vibrations caused by the workings of the two transformers and associated equipment.

## 6 Pollution

Pollution during development and use will principally be caused by noise, light, vibration and toxic surface water runoff. The noise of the current small businesses being demolished, then the construction phase, day-to-day operation (covered above) followed by end-of-life work, which won't be something we can affect, will be managed by the contractors. Light management has a proposal by National Grid and as there will always be street lighting along the A379, this would be minimal impact. Vibration from the two transformers diminishes over distance so Matford Mews and only the closest homes would probably be affected – though they may be irritated by a constant shiver or humming.

Toxic runoff is suggested to be cleaned and then run off into Matford Brook. There is no impact analysis of this proposed additional use of Matford Brook as well as all the other developments that will have treated or untreated surface water flowing down to it (Victoria Heights, Matford Valley, the A379, Haldon Reach, Church Path Valley, Elm Park). Matford Brook is an important contributor to Exminster Marshes (a designated protected European site).

In Maintenance of Drainage Systems, Sections 1.7.1-1.7.2 it is stated,

- 1.7.1. “Contaminants, such as oils and sediments removed from drainage systems, should be treated as contaminated and removed to a licensed waste site, perhaps using a licensed waste disposal contractor. Each operation should be recorded in the maintenance log.”
- 1.7.2. depending on the pollutant characteristics of the facility, it may be appropriate to perform analyses on representative samples of storm runoff and spent filter media to ensure that the handling and disposition of materials complies with applicable environmental regulations.”

## 7 Carbon and Climate Change

There are extraordinarily low carbon emissions expected from this sub-station when you consider the average human according to the World Wildlife Fund Carbon Footprint calculator is about 800 cubic tons (assuming a lifetime of 80 years). Carbon Plan commitments by WSP of Bristol anticipate an average of 451 tCO<sub>2</sub>e of greenhouse gases to develop the site and, with mitigation, to produce 133 tCO<sub>2</sub>e over its operational lifetime (120 years).

## 8 Capacity of Infrastructure

The capacity of water systems is considered separately in DCC/4330/2022. The surface water will be discharged into Matford Brook, along with any unfiltered waste materials from the site. Diagrams do not show where the commercial foul water system actually connects with either the current domestic public sewer serving Matford Mews, nor that domestic public sewer which has yet to be commissioned. Neither is there mention of designated requirements in Maintenance of Drainage Systems, Sections 1.7.1-1.7.2. noted in comment 5 above.

Drainage is not considered disadvantageous by National Grid as they plan to move their 132kV system underground from around the same area of land on Marsh Barton as the site that the majority of people consider to be suitable.

## 9 Health Affects

The Stakeholder Advisory Group on ELF EMFs was formed in 2004 to investigate precautionary measures to address the adverse health effects, such as childhood leukemia, of exposure to ELF EMFs. The Parish Council is not qualified to comment on these health effects and acknowledges it's a complicated area of science. However it is relevant that the [SAGE second interim assessment report](#) published in 2010 made the following recommendation with regard to the siting of final distribution substations: "reasonable practical efforts be made to site substations distant from homes". This recommendation has clearly not been followed in this case, where a substation will be located side by side with people's homes.

## 10 More Suitable Location

Exminster Parish Council believe that the decision to site the facility on Matford Home Farm is fundamentally flawed and driven more by financial considerations rather than selecting the best location.

A far more appropriate site is only a few hundred metres away in Marsh Barton (see Annex 2). This site would be more suitable since it is already in a commercial / industrial area and where there would less visual impact, and much less concern over noise from the plant. The site has been partially prepared for industrial use.

The [Public Consultation](#) in 2021 concluded that

- There is **most public support** for the Marsh Barton site
- There is **least public support** for the Matford Home Farm site
- Matford Home Farm will require significant mitigation with regard to landscape and visual impacts and the impact on the amenity of existing and future residential properties.

Even Devon County Council (Landscape) stated that Marsh Barton "*would be the preferred site for landscape. A large substation here would fit with the character of the wider industrial estate and would not have as wide a visual influence as the other sites due to its low-lying position surrounded by large car showroom buildings and higher ground with trees to the south.*"

The Marsh Barton location has drainage issues that may have made the construction of the facility challenging. However, the Business Park has already had site levels raised to address any flood risk and to accommodate the car dealership and industrial

developments, and the remaining undeveloped land has been partially raised in readiness for development. Furthermore, National Grid are planning to feed Marsh Barton and the City of Exeter through underground lines across this supposedly problem area.

Alternatively, Exminster Parish Council would support the siting of the substation at Peamore. The emerging TDC Local Plan has allocated 99 hectares for a mixed use development. Since the electricity substation is being sized to serve Peamore as well, it makes sense to site it at Peamore where early identification would mean that it can be considered in the master plan at an early stage so as to minimise adverse impacts on future residential housing.

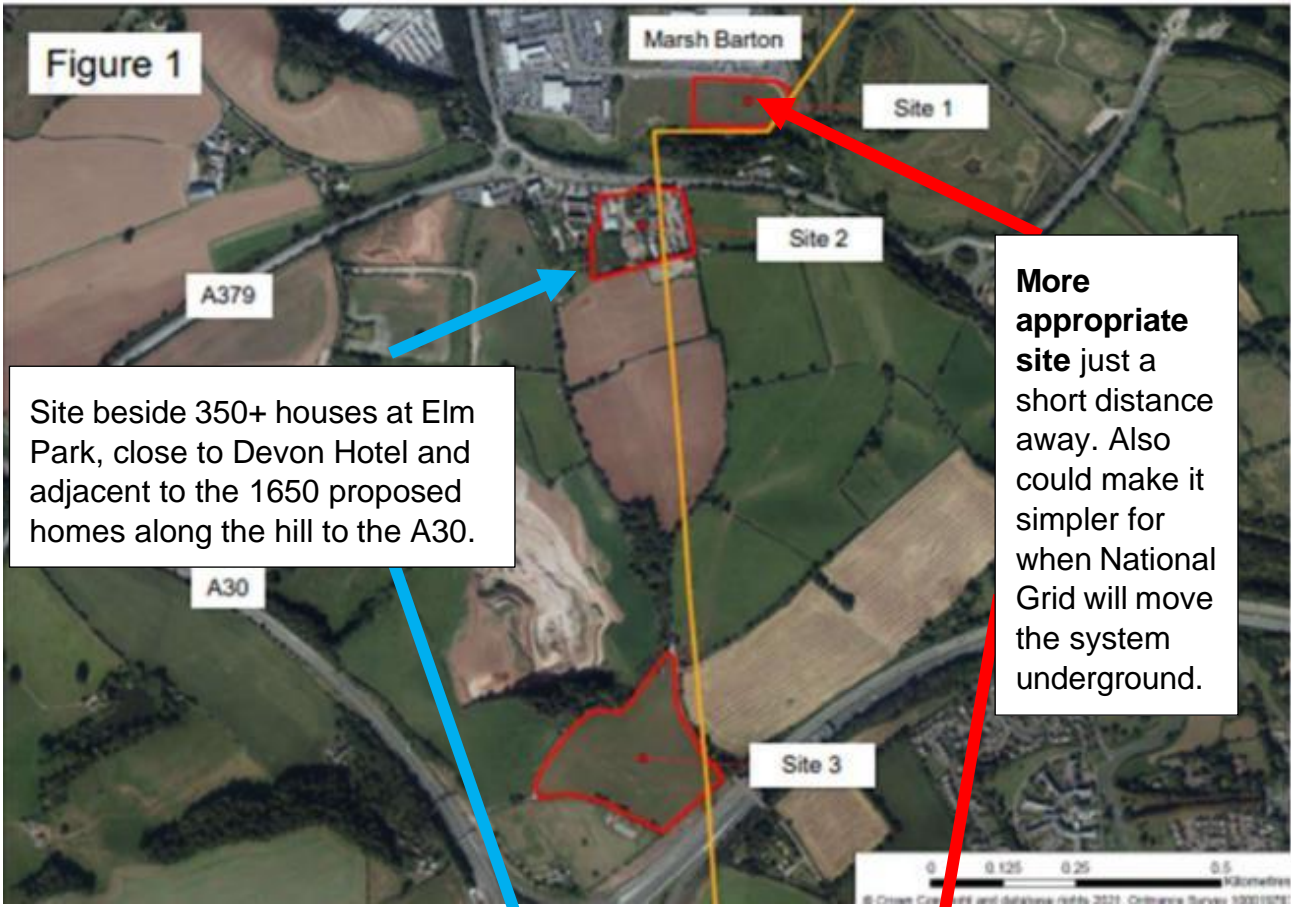
## Annex 1

Picture of similar sub-station and a single transformer. Two are planned for Matford site, plus an electricity plant and a switchgear plant – all set up to enable power to go underground into Exeter.



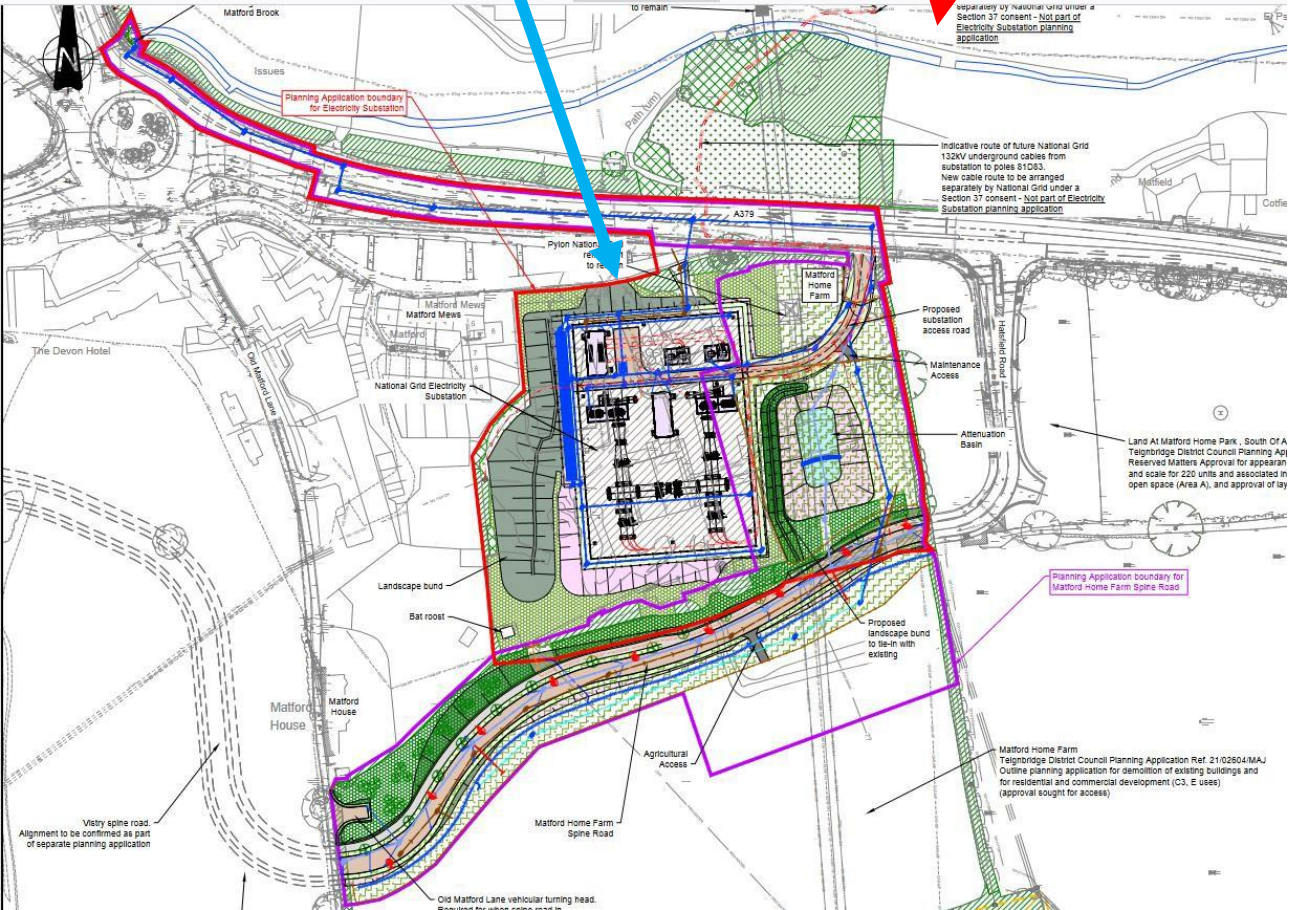


# Annex 2 – Position of more appropriate site on Marsh Barton



Site beside 350+ houses at Elm Park, close to Devon Hotel and adjacent to the 1650 proposed homes along the hill to the A30.

**More appropriate site** just a short distance away. Also could make it simpler for when National Grid will move the system underground.



**Distribution**

Councillor Kevin Lake	Teignbridge District Council Kenn Valley Ward
Councillor Charles Nuttall	Teignbridge District Council Kenn Valley Ward
Councillor John Parrott	Teignbridge District Council Kenn Valley Ward
Councillor Alan Connett	Devon County Council, Exminster & Haldon Ward
Councillor Gary Taylor	Teignbridge District Council Executive Member for Planning
Rt Hon Mel Stride MP	Member of Parliament, Central Devon
Councillor Yvonne Atkinson	Exeter City, Alphington Ward
Councillor Philip Bialyk	Exeter City Council, Leader of the Council