

Mr Howard Smith  
City Development  
Exeter City Council

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23 March 2025

Dear Mr Smith,

**24/1536/OUT**

**Land Adjacent Marsh Barton Train Station, Clapperbrook Lane East, Exeter, EX2 8QE**

Outline application for the construction of Energy Centre for the Exeter Energy Network (seeking approval of layout, access, and scale).

Exeter Civic Society has given these proposals significant consideration, and whilst we accept that an energy plant that uses low carbon sources is desirable, we are also concerned that building such a facility within the Riverside Valley Park will result in the loss of a significant area of Green Infrastructure which we consider is essential to support future residents of brownfield development sites at Water Lane and Marsh Barton. We also consider that the applicant does not demonstrate sufficiently that this is the only site available or that they have adequately investigated other sites and options. **For these two reasons Exeter Civic Society objects to this application.**

The Riverside & Ludwell Valley Parks Master Plan 2016-2026, adopted by the council in February 2016, identifies this riverside area as '...vitally important at a time of continued growth of the city, which we are seeking to achieve whilst also protecting and enhancing its most beautiful features' (Executive Summary). Pages 66 and 67 of the master plan describe the area as 'Island parks for the people of Exeter bringing nature to the city, and people to nature'. And whilst the core of the valley area alongside the river and canal is expected to remain 'natural', Grace Road Fields was identified as an area where the provision of a range of activities could be developed for people to use, and possibly developing a marina to supplement moorings in the canal. And of course, one of the primary reasons for developing the master plan at the time was to provide an alternative recreational area to protect the Exe Estuary Ramsar site – for which the city council has significant responsibilities as the Harbour and Port Authority.

We set out below our reasons for recommending that the application is refused.

1. The initial justification cited by 1<sup>st</sup>Energy for locating an energy plant at Grace Road Field was because it needed to be close to the river to extract heat from the water and to be

located adjacent to the Viridor incinerator so it could also use the waste heat from that plant. This is what was presented to the City Council Executive committee in July 2024 (and presumably in discussions with the City council from September 2023) to justify the location of the plant in this location, despite requiring up to 30Km of pipes to distribute the heat to their preferred commercial clients at the RD&E Hospital, County Hall, and the University of Exeter Streatham campus. And the same method of generating heat for the energy plant was also presented to the public in 1stEnergy's consultation in the summer 2024.

2. It is now clear that the argument for locating the energy plant at this site cannot now be justified because the applicant does not intend to extract water from the river, or to use waste heat from the incinerator. **For this reason we implore the applicant to consider an alternative site and that the council refuse the application on these grounds.**
3. It is our understanding that the Environment Agency and Government legislation states that there should be no development in a Flood zone 3 unless a planning authority determines that there is no alternative. **We do not consider that the evidence cited in the sequential test adequately demonstrates that no other site is suitable, as set out in paragraph 5 below.** We are aware of two sites nearby at Marsh Barton that are currently for sale which the applicant has not included in their sequential test so we urge the planning team to ask that these be investigated. Whilst these adjacent sites may not be as large as the proposed development site, it is clear that if hot water can be transported for many miles to clients, then the energy plant could operate over several interconnected sites with heat and water being distributed between each by insulated pipes, and equally from the incinerator. The two sites are the former builder's merchants on the corner of Alphin Brook Road and Hennock Road Central, and the former Mercedes van centre a few meters away on Hennock Road Central. Other smaller sites may be available for other parts of the proposal such as a computer/data centre.
4. With regard to the size of site being promoted, we wonder whether two smaller sites could be developed if air source heat pumps are to be the primary source of generating heat with back-up gas boilers. **The applicant has not discussed this, but considering both the loss of public open space, and that this proposal is within a flood zone, it is essential that the planning team ask the applicant to demonstrate that this is not possible.** Sites for smaller plants closer to the intended users of the heat may be available, and if on the east side of the river Exe then there will be no need for the applicant to run pipework under the river or canal.
5. The sequential test document lacks adequate analysis/justification for considering/rejecting alternative sites. For most sites the fundamental reasons for rejecting them was that they were not close to a water supply/river, or close to the Exeter incinerator. However, neither of these sources of 'energy' currently forms part of the current proposal which is based around air source heat pumps and back-up gas turbines. **Does the council consider that the proposal still represents an essential infrastructure proposal that cannot be provided elsewhere?**

6. Two of the sites have been rejected because they are close to a rail line and cold air pluming may be a problem, and yet this site is also close to a rail line. **Has the applicant demonstrated that cold air pluming will not be an issue for the mainline rail line?**
7. Whilst the Water Lane SPD code S15 includes the provision of an energy centre at Grace Road Fields, it also includes aspirations '**to strengthen its role as an important site connecting Water Lane, the Riverside Valley Park, Marsh Barton and its station, both for people and nature.**' It goes on to state that '*Proposals should prioritise uses which:*
- *Enhance nature and biodiversity, particularly along the Canal and the railway embankment.*
  - *Establish the area around Marsh Barton station as a regional destination for recreation and water-related activities.*
  - *Improve recreational opportunities, particularly along the Canal and near the station.*
  - *Improve access to the Canal, particularly along the Canal and near the station.*
  - *Improve connections for people walking and cycling between Marsh Barton, the station and the Valley Park.*

**None of the proposals stated above are shown to have been considered by the applicant other than the green infrastructure and walking opportunities, and then only within the red line of the application to demonstrate an uplift in biodiversity. As the proposals stand, there is no opportunity to prioritise the other uses because there is no available land to do so other than hidden behind the energy plant to the south of the site.**

8. Code S15 goes on to say '*Proposals for Grace Road Fields should be developed in collaboration with the Council and other stakeholders including Sport England to ensure a comprehensive strategy for the future use of the site.*' And also states '*Development proposals for other sites in Water Lane should explore opportunities to support proposals for Grace Road Fields.*'

**The planning application does not include any 'comprehensive strategy for the use of the site' so it should be refused, or kept on hold until such an exercise is completed. In the Landscape and Visual Appraisal document- section 8, Potential Mitigation, it makes it clear that any such comprehensive strategy for the site will be done at Reserved Matters stage, but in our opinion this will not allow stakeholders (including the public) any freedom to propose any of the priorities for the site, ideas that link the station to the canal, or to act as the gateway to the valley park identified in the valley park master plan. Furthermore, this approach does not allow the developers of other sites to make any suggestions to support any future residents of their developments.**

9. Code S15 concludes with the following statement: '*Uses that are being considered for Grace Road Fields include, BNG habitat bank, woodland creation, recreational area, wildlife hub, canal Basin/marina, energy centre, allotments and solar farm. The Riverside and Ludwell Valley Parks Master plan should be used for ideas and reference.*' **If these uses have been considered important (presumably that is why they are listed in the SPD),**

**the applicant or other stakeholders are not being given the opportunity to develop these and present such proposals. The application should be refused or deferred until such uses have been explored to consider what the best use of the site is.**

- 10.** The Riverside Valley Park Master Plan does not include the provision of an energy plant on this site so this is clearly a departure from that early vision for the valley. And whilst the application cites the city council's solar farm to the north as a departure from the master plan, that site being a former waste disposal site, **it offered less public benefit opportunities.**
- 11.** The application is in outline form for the Exeter Energy Network (seeking approval of layout, access, and scale). It is noted that the layout indicates the provision of six thermal store tanks, each 4m diameter and 13m high, in a line. These will dominate the view of the site from Clapperbrook Lane and Clapperbrook Bridge but the applicant has chosen visualisations that do not include these tanks. **The applicant should be asked to submit visualisations from Clapperbrook Lane and the canal banks that will be seen by the passing public from outside the site, and at times of the year when the adjacent trees are not in leaf.**

If the authority is minded to approve this proposal in the flood zone, and bearing in mind that it is intended to provide essential infrastructure/heating for the hospital and other institutions, how will workers access the plant? **The applicant should be asked to submit information that demonstrates how the energy plant will be kept operational in such circumstances.**

The applicant proposes that many thermal store tanks are positioned to the prominent north of the site which the valley park master plan cites as one of the main gateways into the valley park. **The applicant should be asked to submit visualisations from the canal banks and Clapperbrook Lane, for the winter months without the trees in leaf, to demonstrate the impact of these thermal tank structures from pedestrian routes.**

The applicant justifies locating the energy plant in the valley park because of its intended use of green energy production. We support the use of green energy production but if the council determines that the proposal is acceptable at this location, **the council should condition the proposal with the use of green energy production processes to prevent the applicant reverting to gas boilers or other carbon producing production in the future.**

Yours sincerely

*K Lewis*

Keith Lewis.