

Mr Howard Smith
City Development
Exeter City Council

By email

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30 June 2025

Dear Mr Smith,

24/1536/OUT Land Adjacent Marsh Barton Train Station, Clapperbrook Lane East, Exeter, Outline application for the construction of Energy Centre for the Exeter Energy Network (seeking approval of layout, access, and scale). Additional documents April/May 2025.

We uphold our previous refusal recommendation for this plant in the Riverside Valley Park in our letter dated 23 March 2025. 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 in the wider Water Lane area. Our response today comments on the latest set of documents submitted in May 2025 and is to be considered alongside our previous objection.

Due to the changes to the design of the energy plant, and the preferred choice of Air Source Heat Pumps (ASHP), and gas back-up, the sequential test that looked at alternative sites now looks completely flawed. The applicant therefore should be asked to review the sites investigated to consider whether the revised proposals could be now developed at less sensitive sites. In addition, our previously suggested site of the former builders-merchants site at Hennock Road has not been commented upon – the applicant should be asked to do so.

If you are minded to support the application in its current form, we would like you to consider the following comments which will result in an improved environment for users of the valley park, and support some of the suggested uses of the site set out in code S15 of the Water Lane Design Code SPD.

We prefer the decluttered design of the plant to the layout previously submitted, merging different buildings into one considerably higher Energy Centre Building, with the electricity sub-station alongside. This new design reduces the plant into its main function, for example by giving up the idea of the data centre. The inclusion of indicative space for the potential Water Source Heat Pump building next to the sub-station provides a reminder for the justification for this site.

However, **we fundamentally object to the positioning of the building on the east side of the site because that is the most prominent location on Grace Road Field** for those visiting the river Exe Valley Park. Marsh Barton station and Clapperbrook Lane are designated as significant access points into the valley park, supported by the development of the pedestrian and cycle bridge over the railway. What has now become a very large industrial building at over 100m long and 19m high (equivalent to a six-storey residential building) plus flues extending a further 3.0m would be best situated next to the Energy-to-Waste plant on the other side of the railway, thus forming one industrial complex in this sensitive environment. The height measurements provided in the elevations (DAS VV, p.22) are considerably higher than the one given in the descriptive text (p.18). The application's public views (p.26) do not reflect enough the views from the river valley side, especially to the east and south of the plant. A public facing street frontage to the side of the railway (p.26) is at best misleading, and there are no views from the towpath at Clapperbrook Lane.

Why is it that the plant cannot be moved closer to the railway line and Marsh Barton Station? We note that the ECC Urban Design and Landscape Officer in responding to the previous layout made the point that, in case his other suggestions would be taken into consideration, the side facing the canal 'remains weak in terms of visual amenity' and suggests moving the plant 'further away' from the canal (points 11, 12, 13).

We recognise that the floodwater modelling showed a slight increase in water depth (up to 100mm) to the north-west part of the site which abuts the new station. But, the applicant does not appear to have considered any options to mitigate any increase in water levels which may affect the station and railway. This flood modelling seems to have influenced the positioning of the building **which we believe is very detrimental to the future amenity space and introduces a large industrial building into the valley park**. It seems perverse to place a building on the east side of the site where floodwaters will flow from an over-spilling canal and then need to flow around a large industrial building rather than directly towards the Alphin brook.

In its letter of 5 June 2025 the Environment Agency points out that the 'Flood Risk Assessment does not address the necessary flood conveyance route between the site and the adjacent railway', warning not to obstruct the flow of water in case of flooding by landscaping and planting (p.4). A building on stilts closer to the railway would not obstruct the potential flow of water in a similar way, but allows it to flow under the building.

We recommend that the applicant is asked to submit revised proposals for the re-designed energy plant with it positioned alongside the railway. To some extent this positioning will provide some harmony with the existing Energy-from-Waste plant which is cited at being 27.5m with a 65m chimney, and with mitigation, allow a better flow of floodwaters.

Any increase in water levels that may affect the station and railway can be mitigated by the introduction of flood gates (as installed by the Environment Agency in many locations in its recent flood protection works) and can be further mitigated by reducing the level of Grace Road Field to

provide greater flood capacity which will then run off into the Alphin brook channel to the south of the site. We attach a case study for Tiverton High School where it was necessary to reduce land levels to provide greater flood capacity. It seems to us at this stage that the applicant has made no effort to mitigate the impact of flooding as a result of this proposal other than locate the building in the worse possible location.

The proposed green space between the proposed Energy Plant building, the railway and the Waste-from-Energy plant will not be very inviting to walk through and we wonder whether it is likely to be used by the public at all. Alternatively, a green area on the canal side would provide a more inviting walkway into the area and link much better to the land to the south of the plant. The new plant could also be shielded from the river valley with a choice of evergreen planting, similar to trees elsewhere around Grace Road field. This approach will provide future residents of the area a much more pleasant area of open green space.

As landscaping is part of reversed matters, we at this stage want to raise doubts whether the installation of ponds south of the site would be a good use of space. With the river, canal, Alphinbrook ponds and the flood relief channel, we already have a good amount of aquatic environments in this area. With the Water Lane redevelopment adding thousands of people to the local area, we wonder whether playing fields might be a better alternative, as the increased need for recreational and sports facilities will be considerable, and this may help address Sport England's objection. Playing fields have been here before and a re-introduction south of the plant with a well proportioned access between the plant and the canal would be more beneficial.

Whilst appearance also is a reserved matter, the proposal as it stands now offers grey and green cladding, both of which could be rather cheap plastic-coated panels. We wonder whether a single material finish may be a better option; it could be treated differently to provide relief, e.g. blackened steel perforated, embossed flat.

An annual post-construction report to ECC about which energy sources have been used and to which extend they were used for the generation of the heat would help to keep the central 'green' / decarbonising function of the plant alive over its considerable lifespan. We wonder whether a condition can be applied to prevent increased use of gas (except in exceptional circumstances) to ensure the use of green energy sources? **In line with the appeal of the scheme, ECC also should look into safeguards for the use of gas boilers as a back-up to be ended by 2035 at the latest (compliant with ECC's net zero targets).** Indeed, unless the plant uses Water Source Heat Pumps there is absolutely no reason why it should be in the Riverside Valley Park.

To sum up Exeter Civic Society's position:

1. We object to the plant being in the River Valley Park for the reasons given in our earlier letter and that the Sequential Test is flawed in light of the new information provided.

2. If the Council is minded to grant permission for an energy centre in the Valley Park the plant should be re-sited nearer to the railway line and a revised application sought on that basis.
3. A time limit should be placed on the use of gas boilers.

We recommend the city refuses this application and demands substantial changes to the layout.

Yours sincerely

K Lewis

Keith Lewis

G Vonhoff

Gert Vonhoff