

## **24/1536/OUT Planning objection Outline application for the construction of Energy Centre for the Exeter Energy Network (seeking approval of layout, access, and scale).**

A district heating project which seeks to use technology to provide low carbon heating across the city is welcome. The scope of the current application and subsequent decision at outline stage must be crystal clear: which are 'reserved matters' and which are relevant technical matters. *This* District Heat Network (DHN) project, as it stands, is detrimental in planning terms, contrary to planning policy, carbon reduction targets and the material benefits do not outweigh the material harms on the following grounds:

### **1. Contrary to existing and emerging Planning Policy**

- a. The development is a **departure from the Local Plan.**
- b. The **Riverside and Ludwell Valley Parks Masterplan (page 67)**: does not identify Grace Road Fields for development; it is space for informal recreation, areas of tranquillity and access to nature: "The space is a key place for woodland planting, and forest clearings and openings can be created to provide opportunities for picnicking and fire pits for families to gather around. ...." **Exeter Plan Policy NE2** reinforces this (*emphasis mine*) and includes the following: "Development proposals which are contrary to the Riverside And Ludwell Valley Parks Masterplan [...] *will not be permitted*"
- c. It is noted the **Liveable Exeter Water Lane Supplementary Planning Document**, approved in July 2024, has a specific policy on Grace Road Fields (S15). This includes the following: "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."

The Water Lane SPD actually states (*emphasis mine*) "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 Masterplan should be used for ideas and reference." So the policy clearly states this use should be prioritised, an energy centre is only being 'considered', *which is not a planning status*, and refers back to the Masterplan itself, which allocates the land as open space.

- d. The **Water Lane development** as agreed in the extant outline planning shows the intent NOT to connect to the district heat network (DHN), and has it's own onsite Air Source Heat Pump (ASHP) generation as part of outline planning permission. As such, it was the only other proposed connection West of the Exe to the DHN. This further undermines the case for the Grace Road Field site as a compelling site to place the plant.

### **2. Statement of Community Engagement<sup>1</sup>:**

The Public Engagement was based on the energy source being water source heat pump<sup>2</sup> - *not* solely the air source heat pumps and gas fossil fuel based heat now proposed. There has been no further public consultation on the changed energy sources. The use of the Water Source Heat Pump (WSHP) has been cited as the key determinant for the Plant's location - i.e. near to the River Exe, in the Valley Park on land outside of the local plan. **If this source is no longer the case then there is no reason to site the Plant in this location; however, if WSHPs are to be used in future then their use by a deadline must be conditioned.**

<sup>1</sup> [https://planningdocs.exeter.gov.uk/servlets/direct/KutWqXFwRAR19ICsZIL0vma/2/895805/1/1/AS\\_PDF\\_FILE](https://planningdocs.exeter.gov.uk/servlets/direct/KutWqXFwRAR19ICsZIL0vma/2/895805/1/1/AS_PDF_FILE)

<sup>2</sup> <https://www.bbc.co.uk/news/articles/c99wg4zz705o>

### 3. Transition to Net Zero

**The applicant has not sufficiently demonstrated how the Energy Centre will support the delivery of CP14 (and CC1 and CC2 of the new draft policy) for developments within Exeter allowing for a transition towards Net Zero.**

- a. The *heat output* from the Energy Centre sets out how the heat generated will produce “Carbon savings of at least 13,000 tonnes per year with the potential to increase significantly. 75% emissions reduction from day one for customers replacing gas boilers with a network connection. Improved air quality by reducing use of gas boilers.” These figures relate *only to the recipient buildings*; they do not relate to the energy source used to generate the heat. Indeed they lock in gas generation carbon emissions for the lifetime of the boilers into the 2040’s.
- e. There is **no evidence in the sustainability appraisal setting out the operational greenhouse gas emissions when the plant is in use.** The applicant states the energy centre will secure: “Energy resilience through secure, local, low-carbon heat sources”, yet the applicant has changed the water source heat pumps to air source heat pumps, with gas back up boilers without providing evidence of the greenhouse gas( GHG) emissions that these models will generate to back up the low-carbon assertion.

The Air Pollution reports assumes the gas boilers operate on a continual basis, for 660 operating hours per annum for five boilers and as such produce 26,402 MWh/40MW. However, “five gas reserve boilers are proposed which will be used when the ASHPs cannot operate (although only four will operate at any one time) and two emergency generators are proposed to provide power to the energy centre in the event of an electricity supply failure.”

**The GHG emissions of this gas consumption (and the electricity needed for the ASHP/other sources) are not calculated.**

- f. **Further information should be required from the developers showing the GHG emissions created by the Plant to evidence the ‘low carbon’ assertion and in order to demonstrate compliance with new Local Plan Policy CC1 and Exeter’s Net Zero 2030 priority set out in the emerging Local Plan.**
- g. **A condition should be put in place for annual reporting to the Council on GHG production by the plant, and a timeframe with agreed and conditioned milestone for moving to Net Zero 2030 in line with the Local Plan Policy CC1 & CC2.**
- h. There is no evidence in the sustainability appraisal setting of the greenhouse gas emissions created in construction. Heat loss from the building will have a local impact on the local ecology and increase GHG emissions. **A Condition should be put on the development to require the highest level of construction standard in order to minimise heat loss and maximise sustainability.**
- i. Further assertions made that “Additionally, the Energy Centre is designed to integrate waste heat recovery from the neighbouring Marsh Barton Energy from Waste facility. It will also support alternative low-carbon energy sources like electric boilers, solar thermal, and geothermal power. The implementation and operation of significant thermal storage systems are essential to diminish reliance on peak-time gas boilers.” However, no evidence is provided that the Plant will connect to the energy from Waste Plant to use the waste heat, nor given a timescale for doing so. **A condition requiring connection to the Energy from Waste Incinerator (EWI) while it remains in operation and move away from the EWI to enable its decommissioning should be applied.**

### 4. Amenity:

The DAS describes the site as ‘vacant’ and does not recognise the value of the field for its amenity and sporting purposes as described in the Valley Park Master Plan or in accord with paragraph 104 of the NPPF. **As such compensation should be offered for the loss of amenity and a S106 sum requested for the rehabilitation of the sports hub on the corner of nearby Bromhams Field for a changing room/cafe/kayak storage/nature fields studies centre.** This must be fully accessible for people with disabilities. This area is

within the Water Lane SPD area. The S106 should be paid to the Council, and consideration given for that scheme to be led by a community led enterprise.

## 5. Environmental Impacts

- a. **ACCESS/Trees:** It is not clear from the arbological report<sup>3</sup> the extent to which, if any, of the trees planted as part of the development of the railway, to mitigate tree loss as part of that scheme, are being removed. If they are then these tree must be replaced with similar in type and age.
- b. The Core Strategy (Exeter City Council 2012) Policy CP11 states that *“development should be located and designed so as to minimise and, if necessary, mitigate against environmental impacts.”*

No Environmental Impact Assessment of this application has been required by the Local Planning Authority, despite the fact that the proposed development will have significant urbanising effects and change the use of natural resources, in particular land, soil, water and biodiversity in an area designated in planning policy as a Valley Park. The biodiversity net gain (BNG) reports are so poorly presented that they are unintelligible. The site is within a SSSI Impact Zone, and the impact on a number of local SSIs/local conservation areas are not considered. (**Bonhay Road Cutting Site of Special Scientific Interest (SSSI), Stoke Woods SSSI, The Exe Estuary Special Protection Area (SPA), SSSI and Ramsar site, Haldon Forest SSSI, The Belvidere Meadows Local Nature Reserve (LNR) and Barley Valley Local Nature Reserve** and the Alphin Brook Flood Channel which is an ‘Other Site of Wildlife Interest (OSWI)’). These sites are not acknowledged in section 4.1 of the Ecology report.

- c. The **Ecological Impact Assessment (EcIA)**<sup>4</sup> disregards the environmental measures undertaken with the development of the railway - in relation to **Badgers:** *“Two artificial badger setts were found within newly planted scrub, off-site, adjacent to the east of the Site... Unused and collapsed artificial badger sett. Not available for badgers to enter.”* **Rather than disregarding, the LPA, should be enforcing the previous planning application BNG (equivalent) requirement for the railway to ensure the badger sets are usable and maintained.** It is noted the railway tree planting scheme is described by the applicant as ‘scrub’.
- d. There has been **no justification as to why no water BNG assessment and metric has been considered necessary, this should be explained.** The BNG chart also says *“BNG uplift was not expected on the access track by the LPA. This has been included in the habitat calculation of the metric but the watercourse assessment has not been undertaken as not required.”* The access track is visibly a very low level of and different biodiversity compared to the main field. **Therefore I would like to see it demonstrated that the inclusion of the track in the calculations hasn’t skewed - as in reduced- the baseline and subsequent BNG requirement.**
- e. I agree with the objections raised by Devon Wildlife Trust - so will not reiterate here. The response to DWT’s objection does not address the points raised, and poorly recasts the BNG chart.

**Cllr Diana Moore**  
**St David’s Ward**  
**17 July 2025**

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<sup>3</sup> [https://planningdocs.exeter.gov.uk/servlets/direct/KYr22ewGk4waZKitdWWiHQ/2/895818/1/1/AS\\_PDF\\_FILE](https://planningdocs.exeter.gov.uk/servlets/direct/KYr22ewGk4waZKitdWWiHQ/2/895818/1/1/AS_PDF_FILE)

<sup>4</sup> [https://planningdocs.exeter.gov.uk/servlets/direct/Kq9KM71KN7WO76zORil/2/902389/1/1/AS\\_PDF\\_FILE](https://planningdocs.exeter.gov.uk/servlets/direct/Kq9KM71KN7WO76zORil/2/902389/1/1/AS_PDF_FILE)