



Friends of Exeter Ship Canal

Exeter: A Heritage Harbour

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Liveable Water Lane: Supplementary Planning Document Development Framework and Design Code

Commentary by the Friends of Exeter Ship Canal

Overview and general comment: A separate approach necessary for the Canal

The SPD identifies (p. 8) Water Lane as brownfield land with a variety of uses. A plan shows a length of Exeter Ship Canal, cut off at the Canal Basin, within the site boundary. Throughout the draft there is emphasis on the site being 'defined by the water'.

The Canal and its Basin are an integral structure, in turn part of another, the Port of Exeter. They are also working infrastructure. The water of the Canal and Basin is not separable in terms of use from the land that borders it. What happens on this land indelibly affects the waterway's ability to function. This is frequently missed in the draft SPD.

The Friends welcome the development of Water Lane and believe opportunities for a 'true waterside community' are genuine and compatible with an unimpeded working waterway next door with advantages to both if consideration is given to both. The importance of this is underlined by Exeter's designation as a functioning Heritage Harbour. For there to be a true waterside community at Water Lane there must be a true living waterway and not the near equivalent of a linear boating lake in a park. The Friends believe the new community can be integrated beneficially with the working waterway if the overwhelming case for a strategic approach to the Canal is also accepted by the City Council.

The Friends propose therefore a separate SPD for the Canal as a whole, with a substantial part of it supplementary and complementary to the Water Lane SPD. It is not just to protect and preserve the Canal's function but to maximise the buzz, interest and well-being that living by a thriving working waterway creates for the community.

While it is accepted that this is strategic rather than a matter for the design code, the draft SPD covers both aspects. The Canal Plan could be prepared without undue delay, with input

by key stakeholders, because of the number and quality of papers on the subject already produced, most recently the Exeter Ship Canal and Heritage Harbour Route Map, which could form much of the content.

The following response by the Friends of Exeter Ship Canal to the draft Liveable Water Lane SPD covers concerns about its impact on the functionality and operation of the waterway and where proposed land uses conflict, and underlines the case for a separate Canal Plan alongside the development framework for the Water Lane area. The Friends' responses are in the spirit of positive consideration for both.

Vision

Water Lane – the opportunity (p. 14)

The first paragraph should differentiate between the Water Lane area and the development opportunity within it. The sentences at present are at odds with themselves. Suggested rewriting along the lines of:

Water Lane is an exciting and totally unique development opportunity for Exeter. It is located by the River Exe and Riverside Valley Park, which are valued landscapes and noted tourist and leisure destinations. The area also has an incredibly rich industrial and maritime history and still includes a functioning harbour served by the Exeter Ship Canal, which are part of the Port of Exeter. Water Lane is a convenient (15 minute?) walk from the City Centre and is served by two train stations, but the development site is underutilised and disconnected. It provides an opportunity to rethink the nature of communities and connectivity in Exeter (, starting with walking and cycling).

(pp. 15-16): In the heading to the collage, we suggest clarifying its relevance to the SPD by inserting 'that will guide the planning principles that follow' after the words 'opportunities within Water Lane' and amending the rest accordingly.

The caption, 'The most exciting opportunity in Exeter' and the accompanying image should be re-thought.

Water Lane placemaking principles

We suggest the introductory paragraph (p.17) should read (the amendments are in italics): 'The seven placemaking principles in this section describe what each of the Liveable Exeter Principles *will* mean for Water Lane. The principles are used to structure the Code to ensure all *its* requirements help to achieve the Vision. ...' etc.

It is easy to be confused by the use of the 'present aspirational' tense in the text that accompanies the illustrations on pp. 17-18. We suggest the texts should be rewritten. In Principle 2 'Outstanding Quality', winning an award is not a principle but a desired outcome.

Water Lane Vision (p.19)

We suggest recasting the 'present visionary' tense in 2.3 Water Lane Vision by amending the section heading to read: '2.3 Water Lane Vision – What it will be like', and rewriting the paragraphs in the plain future tense, beginning 'Water Lane will be a truly unique neighbourhood in Exeter and its regeneration a catalyst for transformation across the City. The River and Canal will be ...' etc.

Similarly at various other points in the draft where the 'present visionary' is used. Is this style really appropriate in an SPD?

Are we overusing 'unique'? Water Lane won't be 'truly' unique in the future because its regeneration will be a catalyst for similar Liveable Exeter principles across the City. It will be more a trend or quality groundbreaker. However, it is definitely a 'unique development opportunity' for Exeter at present, as previously said.

The reference in '2.3 Water Lane Vision', 2nd paragraph, lines 3-4, to the 'working Canal' is good: could we add 'and Basin'?

Development Framework Overview (p. 21)

Line 1: What is to be understood by 'illustrative'? Does it mean that the Framework overview as shown is an 'illustration' (i.e., an example), or simply that it is illustrated (i.e., contains images) in which case the word is not necessary. This makes a difference.

Penultimate line of the text: 'are explained' should read 'is explained'.

Colour coding is used with no reference to a key.

(p. 22) For comment on the proposed 'Vibrant waterside space at Gabriel's Wharf', see comment on W11 Gabriel's Wharf.

Memorable Places (p. 29)

Heading: It is not readily recalled that the heading in the box (white text out of green) is a quotation from Liveable Exeter's Principles. Must it be? It would be better in this context if 'the River Exe' were replaced by 'the waterways' so it reads 'including the waterways, the City Centre ...' etc. Alternatively it could read, 'the River Exe, the Canal, the City Centre ...' etc.

A true waterside community (p. 29)

Para 1, line 5 from 'daily life' onwards: Suggest rejigging the following sentences to align with the preceding ones and to reflect the continuing working nature of the Canal and Basin, e.g:

'It's easy to access the waterside and its paths for relaxation and exercise. People can enjoy getting onto the water from new waterfront spaces on the Canal. The working waterway and harbour create interest by attracting more visiting and historic boats

and new waterway related businesses. Maritime heritage and its importance to cultural life are celebrated through activities of the Heritage Harbour which embody an enterprising community spirit.'

Sense of place (p.30)

Para 3, lines 2 and 4: 'legibility' and 'legible' are jargon and add little meaning. Suggest deleting them.

Line 3: these features aren't 'unique'.

Contextual Analysis (p. 30 – paragraph on white)

Line 2: 'has shaped' should be 'have shaped'.

M01 – Contextual analysis (text in box)

Line 5: For 'the River and Canal' substitute, 'the Canal and River'. At the end add a new sentence: 'It is important also to demonstrate the area's relationship with the ambitions of Exeter Heritage Harbour.' (or similar wording).

M03 – Character and cultural identity (p.31)

Line 3: After 'maritime heritage', insert a comma, then: 'designation as a Heritage Harbour', so it reads 'area's industrial and maritime heritage, designation as a Heritage Harbour, and its current role and function' ... etc.

Paragraph on white, p. 31

Line 1, after 'Canal' please insert 'and Basin'.

Line 2: at the end of the line, after 'for' insert 'active', so it reads 'for active Exeter.'

Line 3: between 'many' and 'uses', insert 'leisure and active'.

Line 4: 'paddling' might not be correctly understood. Suggest 'canoeing', 'kayaking' or 'paddle boarding' instead.

M04 – Relationship with the River and Canal (p. 31)

Throughout: Reverse 'River and Canal' to read 'Canal and River'. In the context of the SPD, this is the correct emphasis.

2nd bullet point: Suggest it reads, 'Providing new waterfront buildings and public spaces which place emphasis on the Canal while respecting the working functionality of the waterway and the objectives for its future as expressed in the Exeter Ship Canal and Heritage Harbour Route Map.'

Suggest deleting the reference to the River in this bullet point.

4th bullet point: At the end of the second sentence, add 'and the tow paths kept clear for operational management'.

Also add a new sentence: 'Navigation of the Canal must not be impeded by any added bridge crossing.'

We agree with the Civic Society's suggestion for an additional bullet point about preserving the Canal's 'close to nature' character.

M05 – Key views (p. 32)

We support the Civic Society's observation that new glimpses should not be created as a result of new buildings blocking existing substantial views and believe this should be added to the document.

M06 – Historic and existing features (p. 33)

2nd paragraph, line 2, 'it's' should be 'its'.

Line 3, After 'setting' insert the words 'and water-related functionality'.

Exeter's flagship development (p. 34)

Final paragraph line 3: 'and interest groups' should be inserted after 'local community' to acknowledge the contributions of groups that are not 'local'.

Global city qualities – Overarching opportunities and objectives (p. 35 – text on white)

Para 2, line 8: After 'and businesses', insert a comma, then 'including the advantages of its historically

important working waterway, ...' etc. A reference such as this is worth making given the coverage of the SPD is the Water Lane area.

Q01 – Global city qualities (p.35)

Para 2: Suggest the following tweak – after 'outstanding gateway' amend the text to read, 'to the city's waterways and Riverside Valley Park and enhance the area's regional importance as a destination for new low carbon, water-related commercial initiatives and active leisure opportunities.'

N.B. Well-being is also a global city quality.

Energy Hierarchy – Example 'Pathway to New Zero Carbon' in Operation (p. 41)

I may be out of my depth, but does this graph mean anything? It looks like an illustration of a self-fulfilling prophecy (or wishful thinking).

Q07 – SMART grid and infrastructure (p. 43)

3rd bullet point refers to the provision of electric charging infrastructure for bicycles and scooters. This traffic can attain fast speeds and is permitted on footways and footpaths. It should be included that precautions will be necessary to protect, or segregate, pedestrians on the Canal's tow paths and other waterside walkways.

Water strategy (p. 45)

The text on white that accompanies Q10 should mention that water should not generally be extracted from the Canal for recycling or non-potable uses even if returned after cleaning.

Q13 – Resilience (p. 48)

5th bullet point: At the end after 'public transport' add, 'and water transport on the Canal.' This is important in an SPD for the development of an area adjacent to and 'defined by' the water.

Q15 – Flood risk (p. 49)

Has the flood risk from the impact on the Canal of raised sea levels over the lifetime of the development been considered? We think it should be referenced.

Q17 – Development coordination (p. 50)

We suggest this should be strengthened to state that Water Lane development must not impede the requirements of existing infrastructure where this is shared, and should connect and integrate with sites in current use, such as the Canal Basin and its quays and buildings.

W01 – General land use and activity (p.52)

1st bullet point, line 2: After 'demographic' we suggest adding 'and a new canalside neighbourhood for interest as well as activity.' This keeps the waterside community concept in mind.

'Water-related uses' (line 6) should be emphasised by coming earlier in the list, which otherwise could apply to just about any new neighbourhood. 'Class E' use (line 4) needs definition within the SPD, e.g., what restrictions does it impose on commercial water related uses such as boat maintenance, restoration and repair?

Elements in the list are not sufficiently clear, for example 'space for the charitable sector' and 'heritage centre'.

3rd, 4th and 5th bullet points: 'Land use' proposals should coordinate with and supplement existing functions as well as provide new ones. As well as avoiding unnecessary duplication and making good deficiencies, they should recognise shared needs in order to achieve cohesive and comprehensive development. It is important they recognise that the Canal extends in both directions beyond the development site and that what happens in the development area will have an impact on the ability of the Canal and Basin to function as a whole.

W02 – Land use plan (p. 53)

Please don't name a prime water space 'Gas Works Place'.

On the West side of the Canal Basin, a substantial area of the harbour is shown as 'residential led development'. Its present use by the Exe Water Sports Association and for boat lay-up and repair has disappeared. 'Residential led' is not an appropriate designation for such a

large portion of the remaining harbour space at the Basin. It is already squeezed by non-water related uses of major waterfront buildings putting pressure on maritime use of the quays within the Exeter Heritage Harbour designation. This does not imply that homes cannot or should not be provided within water related development but it is a question of emphasis and overall balance if the Basin is to remain a working waterfront zone in more than name only.

A dedicated craning point at the Basin's West Quay should not squeeze the remaining space for boat repairs, storage and mooring for visiting craft because of the loss of craning facility at Gabriel's Wharf resulting from the Water Lane development. (See pp. 7 and 8 of this document, W05 and W07, below).

No public toilets are indicated on the West side of the Basin, where they are badly needed.

The above and other points relating to land use are detailed in following sections but the plan itself will need amending.

Neighbourhood Centre (p. 55)

The caption beneath the illustration reads as if there will be only one Neighbourhood Centre and local green space in Water Lane, which is contradicted by the land use plan which shows five such areas albeit close by. If there is more than one neighbourhood centre, the caption should read: 'Neighbourhood Centres and local green spaces provide well connected, mixed use centres for Water Lane.'

Water related uses (p. 57 – section on white)

We welcome this section but what will happen to the text when the Design Code is shortened as we assume it will be in the final SPD?

The following amendments are suggested to amplify some of the suggestions made:

Line 2: At the start of the second sentence, before 'Water related uses' suggest adding, 'Commercial, heritage and active leisure' so it reads 'Commercial, heritage and active leisure water related uses are essential ...'

Line 6: For 'interventions' suggest 'improvements'.

First bullet point: Suggest tweaking to read, 'New slipways that enable small and medium vessels, as well as those over 20 tonnes, to get in and out of the water.'

2nd bullet point: Suggest adding a comma, then 'weed-free' between 'Clean' and 'water'.

4th bullet point: Suggest tweaking, 'A water-related hub with spaces for boat building and maintenance, and community projects.'

6th bullet point: Suggest adding a comma after 'facilities', followed by 'public toilets and services for visiting and moored boats.'

7th bullet point: For 'that bring' read 'who bring'.

8th bullet point: After 'the Quay' add 'and the Canal Basin, and to and from other waterside destinations.' – so it reads 'Marsh Barton Station, the Quay and the Canal Basin, and to and from other waterside destinations.'

We suggest deleting the final sentence and substituting, 'The Exeter Ship Canal and Heritage Harbour Route Map has been produced to assist bringing these and other features forward in future.'

W05 – Water related uses (p. 57 – text in pink box)

Items from the adjoining text on white, as amended above, should be included in the pink box if they are cut when the overall document is shortened.

Para 2, line 2: After 'suitable for' suggest inserting 'commercial, heritage and active leisure' before 'water-related uses'.

Para 3, lines 1-2: Amend to read, 'with users of the Canal and River, Exeter City Council and the Port Authority ...'

Lines 6-7: Correct names of the organisations are River and Canal User Group and Exe Water Sports Association.

Para 4, line 3: After 'access to the Canal for' suggest deleting 'water related' and inserting 'working and active leisure' so it reads: 'ensure good access to the Canal for working and active leisure uses and ensure the use ...' etc.

Para 5, line 2: For 'larger vessels' substitute 'vessels over 20 tonnes'.

Para 5: The Friends have argued strongly against a dedicated craning point at the Basin's West Quay in these circumstances on the grounds that it will diminish further the tight space at the Basin for boat-related uses. A suitable craning facility should be retained at Gabriel's Wharf. This view was also the conclusion of the report by consultants Greenwood Projects, 'An Assessment of Current Planning Proposals relating to the Exeter Ship Canal and the Heritage Harbour' commissioned by the Friends with a grant from the IWA South West Inland Waterways Regeneration Fund and made available to Exeter City Council on 4 September 2023. (See paragraph 2, p 6 of this document, above.) The Harbour Master has also called for the Gabriel's Wharf craning facility to be retained.

In addition, all water related uses should assured by providing necessary road access, turning space and parking, while at Gabriel's Wharf this must accommodate cranes of up to 300 tonnes capability to get to the waterside, together with articulated vehicles for onward carriage. W05 must also include slipways, the first item in the adjacent list of bullet points, if this list is to be cut. A slipway of any size needs adequate access: be it for cars, trailers, lorries or cranes.

Employment opportunities: (p.59 – text on white and W07 in pink box)

To underpin Water Lane as a true waterside community these paragraphs should give greater encouragement to maritime businesses and employment opportunities to be located at ground floor level. They should have precedence over other employment uses when property vacancies occur, and pop-ups should be available for start-up and short-term maritime related tenancies. Examples that could be compatible with residential use above, include digital and traditional boat design and research projects, skilled work such as sail, mast and wooden tackle making and other traditional craft and carpentry jobs, spaces for training in such skills, and offices for specialist water related businesses.

W08 – Existing uses (p.59)

The box should emphasise the fruitful potential flowing from Exeter's designation as a Heritage Harbour and the requirements of existing and planned water related activities, projects and businesses envisaged in the Route Map. There is already shortage of space and available buildings at the Basin/Harbour.

The Canal itself is an existing business.

Para 1, line 2: Suggest 'in the area' reads 'in the adjacent, wider area'.

Water spaces

W10 – Gas Works Place (p. 60)

Please don't call it this. The Code must acknowledge this area as an important working area for the Basin, Heritage Harbour and Canal as a whole, especially because pressure on space at East Quay on the other side of the Basin is increasing because of new activities including historic boat restoration and 'pop up' boat building.

The projected loss of the Gabriel's Wharf craning and shipyard facility puts pressure on plans as well as on available space for visiting and longer-term moorings and services for boats. Toilets, showers and waste disposal at the Basin all need improvements. (See Greenwood Projects, 'An Assessment of Current Planning Proposals relating to the Exeter Ship Canal and the Heritage Harbour', September 2023.)

Working space at the Basin will also be at a premium as options develop for water taxis and other passenger services and trips, and a limited return of freight traffic (see below). These are all developments that will help the City adapt to the challenges of new initiatives to achieve Net Zero.

It is essential that the 'Gas Works Place' area is kept accessible to cranes and low loaders.

This configuration is incompatible with the concept of the 'water space' as described and illustrated. The Canal and Basin at this point do not need to be 're-purposed' but encouraged to develop their own facilities. The space next to the former Gas Works Social Club, shown as a playground with trees, should be for boat and maritime related uses to provide adequate room for the Canal and Harbour to grow their services and attractiveness

to maritime activity and business. These activities can also reach out to connect with the community and include spaces for community-led waterway and skills learning projects. The photograph showing a development option at Gloucester Docks is not fairly comparable in this context and should be removed.

Para 2, line 6, and para 3, lines 2-3: Is it 'Maritime Court' or 'Compass Quay' that is meant?

Para 3, first line: There is no need for an additional, distracting, 'feature building' at this site. The existing locally listed former gas works building, the Sea Cadets HQ, the old Welcome Inn and Exe View Cottages compose a coherent and historically appropriate built layout in line with their setting. It is better to incorporate them in the continuing function of the Basin. Line 6: 'Heritage centre' needs clarification and definition in light of the proximity of the heritage centre at the Custom House on Exeter Quay.

W11 – Gabriel's Wharf and adjoining illustration (p. 61)

The Friends of Exeter Ship Canal are far from alone in believing it misjudged and inadequate to consider Gabriel's Wharf in this way.

The reasons for retaining existing facility at Gabriel's Wharf for the management and functionality of the Canal have already been set out by the Harbour Master; the Greenwood Projects consultancy report; responses by the Friends at various stages to the developers' Water Lane proposals; and sections of Exeter Civic Society's Water Lane Prospectus. The current response therefore references all these documents rather than repeats the details here, but this can be done if required.

Despite the statement in W11 that 'development must ensure that water access at the wharf must be safeguarded', the adjoining illustration –

- provides for no vehicular or crane access to the water's edge
- predetermines the question in paragraph 5 of W05 – Water related uses
- allows for no slipway of sufficient size for larger boats of 20 tonnes or more
- a pavilion café with outdoor seating and 'multi-functional public space' occupy the area behind the wharf where currently a boat can be craned out of the water and made safe or broken up in an emergency
- a new pedestrian and cycle bridge across the Canal has been added that will slow down navigation.

Although the illustration is described' as 'illustrative', its inclusion inevitably causes deep unease as to the intentions behind the draft SPD.

Paragraph 2, lines 2-3: W11 references only canoes, kayaks and paddle boards and ignores bigger boats (although one is pictured on the water). The cross reference to W05 does not clarify matters or offer any substantial reassurance as to what is meant by 'water related uses' in W05.

Paragraph 4: Ground floor uses reference water related uses 'such as boat hire' only, (presumably hire of canoes and kayaks), in addition to local shops, cafes and work hub – ignoring potential water related employment opportunities that would help to underpin the waterside community. (See p. 7 of this document, above).

All these show the inadequacy of W11 to meeting the situation and challenge at Gabriel's Wharf. An urgent and more imaginative re-think is needed to 're-vision' how to accommodate a vibrant, interesting working maritime area with residential, catering and other uses – and provide the small workshops referred to under 'Liveable buildings' (p. 63) that help create 'quirky streets to spend time in'.

The future of Gabriel's Wharf points again to the need for a separate, holistic Canal and Basin Plan by the City Council and Port Authority. It would accommodate the functionality of the water and what happens on adjacent land, and supplement the Water Lane SPD. While the draft SPD claims that the water will not be treated as just a pretty backdrop, this is what development at Gabriel's Wharf is shaping up to becoming, especially in light of the developers' outline planning application, which is awaiting a decision. The Friends emphasise again that compatibility is achievable and calls for an open re-examination of the possibilities.

The photograph of the Marina at Bristol Docks is out of scale and context in the particular circumstances of Gabriel's Wharf.

W12 – Clapperbrook Hub (p.62)

Para 1 ignores the Canal as part of – and not merely 'adjacent to' – the strategic gateway to Marsh Barton Station. Combined bus and ferry tickets from the City Centre to the Quay with a ferry to the station and hop on–hop off points elsewhere on the waterway will add to opportunities for active travel and days out. Seasonally, water taxis would be part of the connectivity node at Clapperbrook Hub. See also A04 – Public transport on p. 89, where this point has also been omitted.

Liveable buildings (pp. 63-83)

The canal and tow paths must not be shadowed by the height of buildings along the waterside frontages or inadequately set back from the tow path. Shadowing is detrimental to the water's ecology and the spaciousness of light and fresh air.

The blockish sameness of buildings illustrated as viewed from the Canal (p. 64) does not realise the stated ambition of rich, creative variety of form, and sense of light and space

Building density (pp. 65-68): Planning for maximum density must be conscious also of the experiences of high-rise and other schemes where density has been maximised with the

result that there has been perceived regimentation and people felt oppressed by housing blocks conspicuously above traditional lower skylines as well as the absence of private open spaces, however small.

L05 – Northern canal, frontage (p. 72): Para 2, 1st sentence: Suggest an alteration to read, 'Buildings must be set back from the Canal sufficiently to provide continuous access for management of the waterway as well as public access.' This applies equally to all frontages along the Canal and could be incorporated in an additional panel.

L06 and L07 – Canal Basin zone (p. 74): The second paragraph of L06 is too woolly. In L07, line 3, we agree with a suggestion that 'can' should read 'should'.

L13 – Southern zone frontage (p. 78): See comments on L05 above.

L24 – Non-residential ground floors (p. 83): It should be noted that workshop frontages will need to be fully openable if required, and accessible. In the 5th bullet point in the list, 'under croft' should be 'undercroft'. Comments on the uses of non-residential ground floors are included elsewhere in this response.

Active streets (Transport uses, access and movement pp. 84-114)

Road patterns and usages should assist the requirements of activities and destinations, not determine their existence. For example, access and usage proposals in the draft SPD predetermine the closure of the Gabriel's Wharf maritime and operational facility, with consequential and detrimental impact on the safety, capacity and functionality of the Canal. Once lost, functionality will be blocked off for generations. Access for cranes, lorries and trailers across the open places for people as far as the waterside at Gabriel's Wharf and the Canal Basin is a necessity. We expressed our concerns about Water Lane road layout and access in our response to the Water Lane outline planning application and repeat them here.

We wish also to emphasise the following in this response:

- Tow paths are slow lanes for walking (or towing boats!). Widening them for sharing with cycles and e-scooters is not a satisfactory answer. We support establishing a fast cycle traffic corridor to Marsh Barton Station, separated from pedestrians and slow movers.
- The mobility codes should address the inevitable conflict and danger as a result of the large increase in cycling and e-mobility traffic coming from the development into the city along the side of the River past the Canal Basin where it is flat, and over Cricklepit Bridge to the Quay.
- The impact on pedestrians using Trews Weir footbridge needs to be considered.

A04 – Public transport (p. 89)

We suggest the addition of: 'Options for public transport are also possible on the waterway.

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combined bus and ferry ticket from the City Centre to the Quay and hop on-hop off points at Marsh Barton Station and other waterside destinations will add to active leisure and travel opportunities. Water taxis could operate seasonally.’ See also W12 – Clapperbrook Hub (p. 9 of this document, above).

Water Lane Section 4: Gabriel’s Wharf apartments, access and movement (p. 100) The requirement to provide access for cranes and other vehicles to the waterside at Gabriel’s Wharf has been omitted from the ‘acceptable’ design code, making it unacceptable. See also the commentary on W11 and its illustration on p. 61 (pp. 8-9 of this document, above). Even if the Green Street link between Foundry Lane and Water Lane were used, how would the waterside at Gabriel’s Wharf be reachable?

A22 – Green Lanes (p. 110): We support a call for a general speed limit in the area for cycles and e-traffic in pedestrianised zones and on tow paths where there is shared use. This may not be legally enforceable but nonetheless will add force to warnings to be aware of slower and vulnerable pedestrians and movers.

Site connections

A23 – Canal crossings (p. 112): A new bridge across the Canal in the Water Lane area would slow down operation of the waterway, and impede navigation and entrance and exit from the Canal Basin. All new bridges must have a headroom above water of at least 3.2m (10–11 feet) or at least be equal to the future headroom beneath the A379 moveable bridges when they are replaced. Alternatively they must be at the same height as the M5 motorway bridge! New bridges must be swing bridges, both electrically and manually operable, and boater operated. They must not restrict the width of the canal.

A24 – Canal tow path (p. 112): Our objection to widening the Canal tow paths to accommodate bicycle and e-cycle/scooter traffic has been made under Active Streets (p. 10 of this document, above).

A25 – Railway crossings (p. 113), final paragraph headed ‘Clapperbrook Bridge’: We cannot see how a bus route can be accommodated across the bridge and alongside the canal through the development.

A26 Off-site connectivity and improvements (p. 114): The indicative location for a new river crossing needs investigation. It would put Butts Ferry out of business. That would be detrimental even though the ferry is old-fashioned. It would also disgorge onto the Quay at a very busy location.

Spaces for people and wildlife

Connecting with the Canal, River and Valley Park (p. 115) and **S13 – Canal** (p. 125)

Although the Canal is ‘one of Exeter’s most important natural corridors’ and we are glad that it is so rich, it is important to remember that the Canal is first and foremost a working industrial structure and a vital part of Exeter’s fabric and the economic future of the Port of

Exeter. Its contribution to 'green infrastructure' comes as a welcome result. This is relevant in such matters as maintaining the edges of tow path banks and keeping the water clear for navigation. These points should be incorporated into S13, below.

S13, para 2 (p.125): While accepting the focus of the code, it is important to avoid giving an unbalanced impression. As an industrial structure, the Canal has no 'natural character' (unlike the River). The ecology and habitats for wildlife are a wonderful bonus but the wording of S13 is too prescriptive. We suggest rewording, 'The Canal edge should be as natural as possible to give plenty of space for wildlife compatible with the waterway's function and management. Hard edges shall be kept to a minimum.' The words in para 2, lines 3-4, 'and used only where needed to access the water' should be omitted because cut back and hard edges are also needed at places for navigation and visibility. Lighting from residential development along the Canal or near it must be carefully controlled.

S15 – Grace Road Playing Fields (p. 126): The penultimate paragraph beginning 'Uses that are being considered' should include 'campsite'.

Delivering the Water Lane Vision (p. 133)

It should be included that access and functionality of the waterway must be maintained during the different stages of construction and delivery. Developers should consult users and stakeholders in planning each stage.

Stewardship (p. 134): The proposal that some streets and spaces 'might lend themselves to private management and control by residents' needs greater clarification: as does the proposal that other spaces may have 'stewardship' through a trust or community interest company (CIC). We support the full adoption of all roads, thoroughfares and public spaces. Community participation in maintenance of green spaces is good and would be a matter for local discussion and agreement with the City Council, not the developers.

We thought it useful to go through the paragraphs of the draft SPD rather than repeat many of the general points that have been made already. It may make this response seem unduly critical as regards the Water Lane development. This is not the intention, and we stress again that a Canal and Basin Plan, using the 'Exeter Ship Canal and Heritage Harbour Route Map' and other documents, will help bring the synergy between the new Water Lane community and the working waterway.

John Monks
Chair, Friends of Exeter Ship Canal