



Friends of Exeter Ship Canal

Exeter: A Heritage Harbour

Mr Smith
Development Control
Exeter City Council

By Email.

12th March 2023

Dear Mr Smith

Re: 22/1145/FUL Haven Banks, Water Lane, Exeter, Devon, EX2 8BY

PROPOSAL: Comprehensive redevelopment to deliver a new, mixed use neighbourhood, comprising demolition of existing buildings and construction of four residential-led mixed-use buildings of 2 to 6 storeys, including retail, café/restaurant and flexible commercial units (Class E), residential (Class C3) and co-living (Sui Generis) accommodation, pedestrian square and public realm, amenity areas, landscaping, access, parking, servicing and associated works (revised plans).

The Friends of Exeter Ship Canal object to the planning application for the Haven Banks comprehensive redevelopment. We believe that the proposed redevelopment stands in direct contrast to aspirations for the revival and long-term future of the canal, its basin, and the surrounding waterside area. We believe that the proposed development poses a significant impact on public health and wellbeing and pays minimal attention to the impact that this massive infrastructural change will have on the public at large and on an area of conservation that supports significant biodiversity and the waterside and waterway, as entities, respectively.

This is a critical time for the Exeter Ship Canal, one of Exeter's most significant historical links with the world, which have shaped the city's landscape and character. The canal and its environs offer an invaluable opportunity for innovative thinking and practice, ethical low carbon impact developments that bring new employment and recreational opportunities to the city. In addition there is a city-wide shortage of medium-density, well-planned affordable and social housing.

As a voluntary group, we secured Heritage Harbour recognition for Exeter and are working on a projected Route Map for the future of the waterway and waterside. This will encourage the development of a bustling harbourside that includes boat building and restoration, the sharing of new and traditional skills, more and varied use of the waterway by passenger and other boats and a showcase for heritage and increasing visitor activities on and off. This will also encourage greater understanding about conservation and biodiversity, encouraging waterway and waterside users to become more active in protecting important habitats that will support all our futures.

We believe that this comprehensive, high density, Sui generis redevelopment, described as an 'urban village' by Coplan Estates, Welbeck CP, and Union 4 Planning, does not take our futures seriously, including those of the potential tenants. The carbon intensity of the impact the redevelopment will have on this significant area of the city does not appear to be aligned with Exeter City Council's commitment to becoming Carbon Neutral by 2030 and Exeter City Future's Net Zero Journey by 2030 because of the strain it will place on the environs and infrastructural capacity for all essential services, including the NHS, sanitation, waste, water supply and energy. In addition it will create extra demands on public transport, which is already under pressure.

With specific reference to the high-density Co-living model, it is described as community-inspired, diverse, and inclusive. The subtle rebranding to give this redevelopment an edge should not negate the fact that studies show that smaller residences impair our mental and physical health, limited access to places to dry laundry affects air quality, and that people value light, space for living, inviting others to their homes, and storage. With potential tenancies between 1-12 months this area becomes transient, potentially increasing footfall, access and adding to pressure on wider services. The Exeter Co-living site describes their offer as 'flexible hotel rooms, flexible apartments, and house shares' which contradicts the notion of encouraging graduates or freelance professionals to stay and invest in the city, which changes the dynamic of this waterside and waterway area.

Public Health

As a responsible voluntary group, the Friends of Exeter Ship Canal acknowledge the importance of sufficient good-quality housing and people's health and well-being, especially against the backdrop of our current times. The Haven Banks area has a significant role in terms of sustaining health and well-being, which is why it is vital to protect the environs for the future. We note the reference of other reports concerning capacity, sanitation, flooding risks and safety, light pollution, noise pollution and access to space as critical risk factors in this redevelopment. The new development could increase the local population by well over 800 persons, this is in addition to the current and potential developments taking place on the Southern edge of the city at Alphington, Exminster and Ide.

Access and use of the water ways for exercise has grown significantly in recent years, and the Exe has become a destination for people to paddle board. This is clearly an attraction for many who will occupy these new homes, but the impact of the development must not be such that the highway is restricted to essential traffic to service and support this activity.

Essential Facilities and High Density of Occupation

This mixed-use neighbourhood is unprecedented in Exeter and is not in keeping with the landscape or character of the area.

The extremely high density of occupation proposed is a concern given the development's location in relation to sewers, water mains, and the supply clean potable water, as the developer shifts current commercial use to residential use. This is pertinent considering the continuing climate crisis, the current sewage system being at capacity, and storm and sewage systems being shared in this area. There is potential for this to have an impact on the waterside and water way, and ultimately the integrity of the river, canal, and estuary network as a whole and its significant flora, and fauna.

Typical housing densities in Exeter's residential areas range from 20 to 90 dwellings per hectare, with high density city centre studio flats above 190 dwellings per hectare, according to the Exeter Design Study that forms part of the Exeter Local Plan evidence base. This redevelopment scheme proposes a density of 255 dwellings per hectare, which is above the current Exeter average. It is well above the density recommended for this area in the Exeter Density Study, and considerably above the Exeter average. A medium density dwelling development would provide lower per capita use of essential services. This planning application is not resident focused or generous in terms of public, private, and communal amenity space or a townscape improvements.

Access, Parking and Traffic

The Haven Banks proposal acknowledges that the site 'occupies a strategic position at the start of the wider Water Lane area, which extends eastwards, to the south of the Exeter Ship Canal.' It was suggested in the

Friends' response to the consultation in October 2022 that strategic thinking by all parties involved in the wider area of the waterway is necessary to ensure redevelopment does not block off a water-based renewal for Exeter for generations to come.

Residents' needs and visitors' parking have not been fully addressed. The site closely interacts with the waterside that is Exeter's second busiest tourist attraction. With the 'optimal density' and increased 'productivity growth' suggested by this redevelopment, the canal and basin area will inevitably become busier and more popular as a 'high quality public realm' for leisure. Therefore, parking for the associated traffic must be adequately planned and provided for. At present mitigation from the developer for this is minimal and appears to defer the issue elsewhere, with the developer relying on the mere implication that high-density developments decrease car dependency. The transient model of Coliving suggests the opposite, with potential for fluctuations in volume of traffic flow, and does not necessarily support 'low car ownership levels'. There is no evidence to suggest the loss of car parking on this site has a workable solution, especially when the developer also suggests there is '...ample spare capacity within nearby car parks to accommodate vehicles.'

The commitment to decreasing car dependency is supported wholeheartedly by FESC, particularly as the city is working towards Carbon Neutral and because FESC are also committed to protecting our significant waterside and waterway biodiversity. However, we believe that a more realistic approach is still necessary given what is shown in the application. We are concerned that the limited parking defers the problem and creates an undesirable knock-on effect on parking in the nearest available spaces, likely in streets and roads in the local area. This could exacerbate issues with existing nearby controlled parking zones and put undue pressure on the Michael Browning Way car parks (Haven Banks 1, 2 and 3). While the Transport Assessment's 6.3.4 avers that the Michael Browning Way car parks has 'spare capacity retained during peak periods', we believe this should be available for use by the growing number of visitors associated with the economic and leisure development of the canal rather than providing potential space for residents and commercial users of the new housing developments at Haven Banks and Water Lane.

The Transport Assessment's 6.3.6 claims that '...there are 19 alternative public car parks available for use within a 12-minute walk of the site.' However, they are all busy shoppers' and visitors' car parks, accessible either up a steep hill or across busy roads. We believe there must be an extensive review of parking arrangements across the wider area and that the Michael Browning Way car parks must remain to support visitors and water users. We hope the City Council and the Highway Authority will review this.

The application makes provision for just 32 car parking spaces, including 2 disabled and 5 car club parking spaces (6.126), despite there being 434 new homes. Point 6.5.5 in the Transport Assessment states: 'There is no specific guidance issued by ECC regarding the quantity of disabled parking spaces, electric vehicle charging points or car club spaces.' We query whether it is realistic that there will be only 2 disabled residents, among 434 homes, requiring parking. When sustainable transport is to be encouraged, we do not see that 434 new homes realistically can be expected to share just 5 car club vehicles, especially when 1.2.10 of the Transport Assessment says 'The proposal to provide car club vehicles at the site was received positively by members of the local community'; that appears to indicate that they, too, would welcome the opportunity to use the car club vehicles, thus reducing availability to residents of this development.

485 cycle spaces are proposed, only a little greater than the number of housing units. Both the car parking and cycle parking allocations for the development are unrealistic. Regarding cycle parking, Table 5 of the Transport Assessment appears to forecast just 30 cycle trips per day to and from the residential units. In that case, such a huge number of cycle parking spaces is unnecessary.

A raised section of carriageway is proposed along Haven Road between the site and Piazza Terracina 'slowing traffic and improving pedestrian dominance in the area'. It is further stated that refuse collection vehicles will

be the largest vehicles to access the site. FESC recognise there is a lot that is attractive in the traffic calming, but the application should not be approved until:

1. Roadway infrastructure and management in the wider area has been reviewed;
2. The necessity for heavy vehicles such as cranes and boat transporters to reach the basin and its improved facilities be taken account of as a necessity for the area.
3. Pinch-points should be prevented; we believe pinch-points will arise because of random parking in unsuitable locations causing both inadequate long stay parking provision for residents and visitors, and inadequate short stay parking for vehicles delivering to residents and businesses.
4. Recreational activity on the water is recognized as beneficial for well-being and inevitably will grow. We believe that means there will be growing demand for larger scale competitive and fun events on both the river and canal. These will attract participants of all ages and abilities, and some from that are travelling outside the local area. Adequate roadway access is essential.
5. Existing cycle paths are not up to the necessary safety standards. The redevelopment proposal includes 485 cycle parking spaces. The number of additional bicycles will have a significant impact on the canal towpath and cycle path from the canal basin to Salmonpool Bridge. Cycleways need to be the correct width and provide safe routes to both pedestrians and cyclists, especially if we are to promote Exeter's City's Live Better programme and work within the Council's Healthy and Active City aspirations. We want to encourage cycling. This requires work with Sustrans and Exeter Cycling Campaign as part of strategic planning for off-site connectivity.
6. The proposed raised highway extends over a long distance, and as such may not have the impact of slowing traffic that is intended. To ensure that pedestrians and cyclists can cross Haven Road safely, we wonder whether further safety measures are needed between this development and Piazza Terricina, and from the footpath adjacent to the Coolings and 62 Haven Road.

The accommodation for cycles at Exeter St. Thomas and the new Marsh Barton railway stations, both of which the application highlights as assisting transport for the development's residents and visitors, is vital. It would

1. Help the decrease in car dependency
2. Promote active travel
3. Support social connections and ambitious employment opportunities.

The Exeter Local Plan's overarching draft spatial strategy suggests developments should be delivered at "optimal densities to minimise the need to travel and maximise walking, cycling and public transport". To do this, the developer needs to address the issues raised around access, parking, and traffic by FESC and other residents, businesses, and waterway users.

Material effect on the operation of the waterway

It is ironic that this planning application should be made in a city like Exeter that boasts a significant 'Russell Group' university that is leading on problems of, and solutions to, environmental change. The Russell Group itself state that 'To build a more sustainable world we must change our behaviours and innovate like never before'. Wildflower grassland, roof gardens, ornamental planting and urban tree planting to replace trees lost through this redevelopment is appreciated but this is not innovation. The biodiversity of the waterside and the waterway is life sustaining, and should be appreciated, respected and valued meaningfully.

Any effect on the economic, maritime, tourist, community, sporting and leisure, and health and well opportunities of the Exeter Ship Canal and Basin is a material factor in consideration of the present planning application. The canal and its environs offer an invaluable opportunity for innovative thinking and practice, ethical low carbon impact developments that bring new employment, personal and recreational opportunities to the city.

We believe the proposed over-development will impinge on access for boaters and other waterway users, businesses, local communities, and visitors and therefore on the development of a bustling heritage harbourside. It will therefore be to the detriment of the sharing of new and traditional skills, more and varied use of the waterway by passenger and other boats, and of Exeter as a showcase for heritage and increasing visitor activities on and off the water. Losses such as these are for generations. They constitute one range of material reasons, among others, for refusing the application as it stands.

Yours sincerely

A handwritten signature in black ink that reads "A Gallagher". The signature is written in a cursive style with a large, prominent initial "A".

Andrea Gallagher.

On behalf of the Friends of the Exeter Ship Canal.