

Copy of Email sent to Kirsty Curnow-Bayley, Exeter City Living – 2 February 2023

## Haven Banks Residents Group response to the Public Engagement on ECL Canal-side Proposals

Kirsty,

Regarding the Exeter Canal Side proposals, these are the collective views of the Haven Banks Residents Group. We appreciate the extension to the consultation period and have used the time to refine our thoughts. We hope these observations will be helpful in refining your plans.

Please acknowledge receipt of this response to your consultation exercise.

Firstly, let us say that we support some form of new development on this site and there are indeed several well-thought-out aspects to your proposal. However, we do have a number of reservations and concerns with it and, as we are sure you will appreciate, this response focuses primarily on those concerns. We feel that if these can be addressed, there is an opportunity to create a really positive plan for the site and enhance Exeter's, Heritage Status, Historic Ship Canal.

We have expanded our responses in greater detail below but in summary, the issues, which we feel need addressing in your next proposal, fall under the following headings:

1. Preservation and enhancement of the Historic Canal Basin.
2. Phasing between the delivery of much-needed infrastructure for the site and development on the site itself.
3. Safety on Haven Road and the creation of a public realm.
4. Flood risk and escape routes.
5. Pedestrian and bicycle connectivity to Exeter city centre.
6. Connectivity between Michael Browning Way and Water Lane.
7. Possible misinterpretation or misunderstanding of Exeter City Council's policies.
8. Height and massing: unclear or missing information on these elements.
9. Sunlight and daylight impact on neighbouring properties as well as the Canal Basin.
10. Privacy of neighbours and their consequent safety and well-being in their own homes.
11. Allowance for the Ride-On bicycle charity's workshop.
12. Implementation of Passive-House Standards in practice.
13. Anti-Social location of the bin stores.
14. Turning of large vessels on the canal.
15. Practicalities of using the new boat stores.
16. A suggestion for a radically different approach.

For your convenience, we have numbered our paragraphs to match the numbered bullets above.

1. Other than the Cathedral, the Historic Quay and Canal Basin is the most visited tourist attraction in Exeter. Together these are the two principal historic jewels in Exeter's crown. It is incumbent on residents, the Council and developers to work to protect and enhance both these treasures for now and the future. Given their unique value, it is vitally important that any changes or developments should be judged against much higher standards than might be applicable elsewhere in the City. The present proposal, whilst delivering a rather modest number of homes, will have a substantial negative impact on the canal basin and surroundings.

2. Haven Banks is effectively an island with limited access or egress, sandwiched between the mainline railway to the West and; the river and canal to the East. As you will know, the Exeter City Living proposal is one of three significant development proposals in Haven Banks and so a joined-up approach to the vital and necessary infrastructure projects should be addressed as a priority in future proposals. We feel that until this infrastructure is actually physically delivered, no development can be permitted to commence, due to serious public safety concerns. We fear that, if not carried out first, the risk of them never being delivered is high and we would all have to live with the miserable and dangerous consequences. In your future proposals please address not only the specific infrastructure points raised in subsequent bullets but specifically the issue the phasing of those infrastructure works with construction of a development on this site.

3. Haven Road is a relatively narrow two-way road servicing two substantial housing developments (Maritime Court and Compass Quay) as well as (in Michael Browning Way) a trading estate, offices and two car and coach parks. On the northeast side of the road (the Canal Basin side), parking is allowed in two 'strips', which narrow the road to a single carriageway. On the southwest side (adjacent to the Maritime Court development) parking is not permitted and there is no curb separating the carriageway from the pavement. This arrangement results in either congestion as vehicles queue to await oncoming vehicles, or impatient drivers illegally mounting the pavement to pass oncoming vehicles in the narrowed section. The new development shows that the narrowed section will be extended a substantial distance further southeast (beyond the exit to Michael Browning Way), which will increase the risk to pedestrians and other vulnerable road users. A schoolchild should rightly feel safe walking along the pavement. This proposal makes an already bad situation even worse. The Exeter Canal Basin Masterplan, adopted in 2004, and referenced in your proposal, suggests pedestrianising Haven Road opposite this development site, (with vehicular access only for residents of Maritime Court). Please bring forward ideas in your next proposal to address these traffic safety issues and the longer-term plan for this section of the public realm.

4. As you will know, the site is in a flood-risk area and so we are pleased to see you have avoided residential accommodation on the ground floor. We agree with this approach, however, if a flood event occurs it may be necessary to reach residents in need of priority services and those with emergency medical problems or particular disabilities. So, despite this sensible design, consideration should also be given to flood evacuation. A general consensus seems to be forming around the Environment Agency's proposed solution for Haven Banks to have ramped access to a railway siding, over the mainline railway, to the northwest. Please address this point in your next proposal.

5. The 2004 Exeter Canal Basin Masterplan suggested using the ground floor of this site for parking. We welcome the fact that this proposal does not honour that idea and instead aspires to encourage cycling and walking, in line with Exeter City Council's zero carbon targets.

However, it will not be practical for residents of this site to gain safe access to the city centre on foot or by bike given the recent removal of Mallison Bridge. With the increasing population proposed for Haven Banks, there is no viable route from this site to the city, due to the narrow bottleneck alleyway between the North end of Cricklepit Bridge and Commercial Road (adjacent to WabiSabi Bay). Mallison Bridge needs to be replaced to make your proposal viable. Your proposals state “The canal basin is well connected to historic Exeter Cathedral and is only a 15 minute walk...”, please correct this statement in future submissions as the connection on foot is currently unsatisfactory.

6. Another infrastructure project which we would also like to see addressed in subsequent proposals and, which is also referenced in the 2004 Masterplan, is the completion of Michael Browning Way to link up with Water Lane. We would be grateful if you would comment on this in your revised proposals, especially given the points already made in paragraphs 2 to 5 above.

7. We believe Exeter City Council's 'Consultation Charter' has been misinterpreted or misunderstood, specifically items numbered; 2, 6, 11 and 16 in that document, which talk about: the four Gunning Principles, consultation questions being written in an objective way, sufficient time being allowed for consultation and consultations being timed to allow the results to influence the proposals.

A second policy document we do not believe has been followed is the 'Exeter Canal Basin Masterplan' of 2004. As we are sure you are aware, the 2004 Masterplan is: *“a major change from the previous planning brief adopted in 1999 with the principal differences being an emphasis on water-based activity; retention of boat laying up; a smaller scale development; an emphasis on mixed use; reduced height and massing of the new build elements of the scheme; and the ability to adopt a more incremental approach to development.”* The master plan goes on to describe the desired heights and massing of this specific site in greater detail. This proposal does not respect the Masterplan in this regard and seeks to greatly exceed the heights and massing. In particular, your proposal seeks to use the height of the two historic warehouses on the other side of the Canal Basin to justify its height. The proposal shows that the development would be over 50% higher than the adjacent Canal-side Bakery, rendering it quite out of scale with the other buildings on the southwest side of the basin. The massing and height are our primary objections to your proposals.

Please comment on your interpretation of both of these documents.

8. In the documentation you have provided on your website and at the public consultation, you have not made explicit the actual heights of the buildings. However, from what we can tell from our conversations at the consultation, the heights do appear to be excessive. It is very difficult to understand from your proposals where the cross sections are taken, nor the actual heights proposed. The axonometric drawing is particularly misleading and distorts the heights. Please provide actual heights, street-level views and cross sections through every property opposite this site on Haven Road, perpendicular to the frontage of each property. It seems as if you are trying to hide the truth about the impact of the heights. Usually, buildings are stepped down as they approach a water's edge, not stepped up. And to quote one local resident, “Of all the proposals for this site, this is by far the worst”.

9. In future submissions please provide full daylight & sunlight modelling at various times of year and day, not only for the properties on Haven Road but also for the Canal Basin itself.

This proposal would put the canal in near constant shade, removing its public amenity, risking its Heritage status and; damaging the ecosystem and wildlife. When we speculate on what could have been built on the development site, as you have speculated, the impact of the loss of sunlight on the canal may be the reason previous custodians decided to limit the height of the warehouses. Those on the East side are far lower than those on the West side of the canal. This is likely why nothing excessively high has been built on the site since the canal basin was opened nearly 200 years ago.

10. The proposal impinges on the privacy of the residents of Maritime Court opposite this site. Their living rooms and main bedroom front onto Haven Road as do the doors to their bathrooms. This is not an issue at the moment as they are well above street level, and the ground floor front rooms on most of the properties are not their main living area. However, with buildings this high and this close, all privacy would be lost and they would have to keep their curtains and blinds closed all of the time, which we are sure, you would agree is a miserable way to live. As well as loss of privacy there is a safety concern arising from the impact your proposals, as it would mean the loss of the natural light needed to illuminate the stairwells in these properties. This is particularly concerning as no light comes into the stairwells from the rear of the properties due to fire doors at the back. So with curtains and blinds closed for privacy and fire doors closed for fire safety, their stairwells will become dangerously dark. Please address this point in future submissions.

11. No provision has been made for the Ride-On bicycle charity which occupies 61 Haven Road. This is despite the Watersports Association retaining numbers 62 and 63 and benefiting from space in a new building lot next to number 63. Ride-On use No. 61 as a community workshop and training venue. Please do not forget to include them in future proposals.

12. We welcome the commitment to Passive-House standards but wonder whether there is a different way to achieve these standards without having such large voids between each storey, adding significantly to building heights. The current proposals show a spacing between the residential floors of 3.5 metres – this can be compared with the government minimum ceiling height of just over 2.0 metres and the inter-floor spacing of 2.7 metres in neighbouring flats and townhouses. There must surely be a way to achieve these important environmental standards with a smaller void, even if this is a little more expensive to construct initially. Please address this point in future submissions.

13. The planned location of the bin store for all of the commercial, club and residential premises, on the ground floor opposite Nos. 10 and 11 Maritime Court is frankly anti-social. They should, instead, be located at the end of the building opposite the existing warehouse (Bakery), perpendicular to Haven Road, where they will be much less intrusive to all, not just to neighbours. The current planned location of the bin stores is clearly inappropriate on multiple grounds. Please resolve this in future proposals.

14. One of the proposed new pontoons would block the Canal Basin Turning Area (notch) used by larger vessels. This would have a detrimental impact on the ability of boats of the size, for which the ship canal was designed, to use the canal. It would reduce leisure and tourism, have a detrimental impact on the local economy and make it unusable for larger vessels. For example, Stuart Line Cruises would not be able to run their regular summer trips if the river is impassable again for any reason, as was the case in recent years when the swing bridge needed to be replaced. Please move the proposed pontoon to a more suitable location in future proposals.

15. The layout of the boat storage appears to show that any rowers stowing and retrieving the longer boats would struggle. We are concerned about the space between the end doors of the most southern building and the turning notch as this looks much shorter than the length of an eight. Also, the area proposed for dragon boats does not look suitable to handle them on the canal side of the buildings. Please confirm that dragon boat users, and other boat users, would not be forced to illegally trespass on private driveways in Haven Road. Also confirm that they would not be at risk of coming into conflict with traffic on Haven Road nor with cars parked on the driveways. We are concerned about injuries to people and; damage to private property and boats.

16. Finally, and hopefully, on a more positive note, consideration should be given to challenging the proposed form of development sites outlined in the 2004 Masterplan. Specifically, we propose swapping this site with the boat layup on the opposite side of the canal next to the Outdoor Education Centre. Although admittedly an awkwardly shaped site for housing development, it would be of benefit to prospective occupiers to be on that side of the canal as they would have improved views and increased sunlight. It would also cement the low car / no car ideals, which were not envisaged in 2004 and which assumed easy access to a road and onsite parking would be a necessity. This 'swapping' proposal would have far less impact on Maritime Court, Compass Quay and the Historic Canal Basin in many ways, not least avoiding overshadowing. The river is far wider than the canal, so overshadowing would be much less of an issue. If the site opposite Maritime Court were used for boat layup or other mixed use water based and maritime activities, then this would enhance the Canal Basin and potentially keep everyone happy. The Watersports Association and Ride-On bikes would, we are sure, appreciate this alternate, sunlit location to the East side of the canal. Any high buildings on that side of the canal would be in keeping with their immediate neighbours.

We hope this will be helpful in improving your plans and we look forward to the next round of consultation. We hope the way we have expressed our thoughts in the limited time available has not presented us as adversarial. We wish to develop a relationship of a critical friend and look forward to working with you in an open, honest and collaborative spirit in the future.

Kindest regards,

Richard Smith  
On behalf of the Haven Banks Residents Group