

22/1145/FUL

Mr Smith,

These are the combined comments, on the above application, from the Haven Banks Residents' Group.

We are grateful for the hard work you and the Urban Design Officer have put in to help the developer shape their proposal into something more acceptable. It is a pity this burden falls completely on yourselves as the local community is receptive to direct engagement with the developer, as we have had with other developers who have brought forward plans in the neighbourhood.

We believe the Retail Park site should be developed to provide much-needed housing stock and we are in favour of some form of residential development on this site. However, we do not believe the developer has properly considered the characteristics of this proposal and its impacts on the rest of Exeter.

We have numbered our paragraphs to match up with our list of concerns, which are:

1. Heritage and Character
 2. Fire Safety
 3. Errors and Omissions in the REVISED Submission
 4. Daylight and Sunlight
 5. Flooding
 6. Infrastructure
 7. Health
 8. Parking and the Local Economy
 9. Trees
 10. Damage to Existing Properties
 11. Accessibility / Adaptability
 12. Views
 13. Community
 14. Buildings in General
 15. Other Concerns
- Appendix A - Block A specifics
Appendix B - Block B specifics
Appendix C - Block C Specifics
Appendix D - Block D specifics

1. Heritage and Character

- 1.1. The proposed development is alongside the Riverside Conservation Area, close to two scheduled monuments, and many listed buildings. As such, together with Exeter Cathedral, it is considered one of Exeter's top heritage sites.
- 1.2. Exeter City Council's Core Strategy states: "CP4: Residential development should achieve the highest appropriate density compatible with the protection of heritage assets, local amenities, the character and quality of the local environment and the safety and convenience of the local and trunk road network."

- 1.3. The Quay's position as a Heritage Harbour, and one of Exeter's top Tourist Attractions, is dependent on protecting and enhancing its immediate surroundings. If the Quay and the Cathedral are not protected what is the value in adopting objective CP4?
- 1.4. The architecture around the Quay consists of a range of one-, two-, or three-story buildings with a variety of forms. These are presented with a range of pitched roofs, gables, brick and stone, pitched roofs, and many reflect the Quay's historic role in shipping, construction and warehousing.
- 1.5. The current proposal's density, height and massing are completely out of keeping with the existing structures. The proposals will erode, rather than enhance the unique character of this historically important part of Exeter.
- 1.6. The Quayside heritage is irreplaceable and must be conserved for present and future generations. This area is deserving of sensitive development, not the monstrosities proposed.

2. Fire Safety

- 2.1. There is no REVISED Fire study despite the previous one being inadequate. The developer appears to have ignored the comments made with regards to fire safety. It is important this is addressed at an early stage in the planning process.
- 2.2. There has yet to be any consultation with Devon and Somerset Fire and Rescue Service.
- 2.3. As an example, just three specific concerns raised about the original Fire statement form (27/06/22) and, which have not been taken on board are:
- 2.4. The previous report referenced a gate at the end of Diamond Road, which is now proposed to be a fence. The Fire Service were unhappy with this as an access point, but no alternative access has been suggested in the revised plans.
- 2.5. Section 8 of the previous Fire Statement highlights an issue in Block D where there is a stairway that is currently inaccessible for fire appliances. This fire safety issue has not been addressed in the revised plans.
- 2.6. Again, with regard to block D; Section 4 states there has not been any consultation with Building Control at this moment and Sections 7 and 8 highlight parking difficulties for fire appliances.

3. Errors and Omissions in the REVISED Submission

- 3.1. Specific key street-level views have been omitted. See section 12 for details.
- 3.2. The Daylight Study does not include the Skylight in the main bedroom of 78 Haven Road or the rear window of 8 Stream Court. It misses and several gardens, including those of the two properties listed above. Also omitted is an assessment of the impacts on solar panels.

- 3.3. The developers describe the houses in Stream Court impacted by the loss of light criteria as being located "broadly southwest of Block A". This is incorrect, the building altering daylight and sunlight accessibility for these properties is Block D.
- 3.4. The original Fire Safety report (the only one available) is almost impossible to read with light green text on a white background and does not meet basic accessibility requirements. It refers to the Devon and Shropshire Fire Service, an error which was pointed out during the original public consultation. Why has a revised Fire Safety report been omitted, especially given Grenfell?
- 3.5. The Tree Report has not been revised and so still shows T19 as being scheduled to be removed. This tree has clearly been being misclassified and is at least in category B. We wonder whether the tree consultant made a visit to the site or simply went from photos as the image of this tree is of poor quality.
- 3.6. The artist's impression of the elevation of Block A shows a mature tree in the position of tree T19 and the 'Verified Views' document does show this mature, healthy, Class B tree in place. However, as there is no new tree report, it is still scheduled for removal. We struggle to see why this would be necessary to deliver the development, especially given a mature tree is promised for this location.
- 3.7. None of the REVISED documents make it clear what the revisions are. It is a requirement to cloud drawings for the changes on each revision. Not doing this makes it impossible for any consultation to be meaningful.
- 3.8. As you will know, there were initially issues with the planning portal, which were outside of your control. However, this has resulted in people assuming the original documents were the resubmission and so not commenting further as it appeared to them that nothing had changed, and they had made their views clear on that submission. The REVISED documents arrived after the notification came out.
- 3.9. We cannot see a REVISED Flood Risk Assessment.

4. Daylight and Sunlight

- 4.1. The shade study provided by the developer does not recognise the significant impact this development will have on neighbouring homes.
- 4.2. In the Winter the development will cast shadow and deny sunlight to properties and gardens.
- 4.3. Winter mornings impacts would most acutely be felt in – Water Lane (3-9, 17-19, including solar panels), Painters Court (all properties), Stream Court (all properties including solar panels at No 11), Haven Road (64-78) and Diamond Road (All properties)
- 4.4. Winter afternoons – Maritime Court (1-), Chandlers Walk (NW properties)
- 4.5. On Summer mornings – Water Lane (17-19 including solar panels), Stream Court (81-13) and Diamond Road

- 4.6. Summer afternoon/Evening will impact – Maritime Court (1-19), Chandlers Walk (NW properties)
- 4.7. Since the last consultation we have been requesting information from the developers regarding Daylight and Sunlight reports for the residential properties in the vicinity of the site. Reports have been submitted in February 2023 just prior to the presentation to a formal Planning Committee.
- 4.8. There are at least two individual sets of neighbouring rooftop Photovoltaic panels in situ. Photovoltaic panels have a right to light. We have not yet received a report that shows what impact all of the buildings' shadowing levels will have on the panels nor if there is an impact on the panels' effectiveness leading to being able to put a value on any loss of efficiency. (William Ellis McLennan v Medway Council, High Court Ruling; BRE 209 2022 revision, good practice guidance on site layout planning for daylight and sunlight).
- 4.9. Most of the residential buildings around the Haven Banks Retail site are older than 20 years old and should be assumed to have acquired a right to light under the Prescription Act 1832 (2.2.21BRE p18 Edition 3).
- 4.10. The BRE Guide also assumes that all development sites are 'urban' in nature. However, this site is incredibly open and, while not fields, the houses have had the best light possible over the full 12 months. If in the future anyone wanted to add solar panels to offset their energy use this would no longer be a viable working option. The loss of daylight/sunlight will be more noticeable from the current 100% to 66% on the nominal test day March 21st, the Spring equinox. The loss of sunlight will be greater in the Winter months as the orientation of Blocks A and D effectively masks early morning to noonday sun and afternoon sun. Our living rooms will no longer have the therapeutic, bright, cheerful health-giving effect. The gardens of these houses will be more overshadowed.
- 4.11. The Daylight and Sunlight reports submitted record the following Daylight Vertical Sky Components
- 7 Stream Court is impacted the most and will experience a gloomier living room area which will require additional lighting during the day. Result. 29% more significant loss
 - 8 Stream Court. 21% 'minor adverse loss'
 - 9 Stream Court. 21% 'minor adverse loss'
 - 10-14 Stream Court no data supplied. Why was this data excluded?
- 4.12. We believe that better 'good practice' would be achieved if all results were reported rather than stating 'meeting default target criteria'.
- 4.13. When considering Daylight distribution BS EN 17037 recommends a minimum of 1.5 hours of direct sunlight at the equinox. If exceeding 20 % reduction of daylight, the occupants will notice the reduction of sunlight within the room.
- 4.14. In Winter solar heat gain can be a valuable resource.
- 7 Stream Court - 23% minor adverse
 - 8 Stream Court: no data provided.
 - 9 Stream Court -30% moderately adverse
 - 10 Stream Court-32% moderately adverse
 - 11, 12, 13, and 14 have no data reported. Why was this data excluded?

- 4.15 Regarding Sun on the ground, the BRE Guide states that the garden of an existing property is adequately lit if at least half the garden receives 2 hours of sunlight on March 21st. The eastern gardens of nos. 11, 12, 13, and 14 Stream Court are more affected by losing sunlight on the ground and fall below the recommended amount (Table A p. 23. Developers report).

5. **Flooding**

We are disturbed that, given the significant concerns raised by the 2022 Planning Application, the letter covering the revised application (16 February 2023) makes no mention of flooding or any changes made by the Developer to address these concerns. Our specific concerns are:

- 5.1. **Elevated Flood Risk:** We understand that the Environment Agencies' latest modelling (August 2022) indicates that, despite the recent River Exe Flood Prevention Works, the site is now at greater risk than previously estimated. Flood levels are now estimated to be 0.25 metres higher. The Environment Agency consider that Blocks B, C and D are at risk of more than 1 in 100-year flooding events (with due allowance for climate change) and that the proposed levels of the commercial floors are unsafe.
- 5.2. **Lack of Realistic Flood Evacuation Routes:** Two routes have been suggested. One is southwest towards the old rail line in Marsh Barton. This would require a new bridge over the mainline railway (which is unplanned and unfunded) and necessitate evacuees walking in water 300 metres across the flood plain to reach the bridge. The other is northwards across Cricklepit Bridge and through the alleyway to Commercial Road and Quay Hill. This again involves crossing the flood plain, then traversing the, presumably flooded, riverbanks and navigating a narrow alley.
- 5.3. **Practicality of Evacuation Routes:** The indicated evacuation routes would be challenging for fit people in a flood emergency. However, for the less fit, the elderly or young children they would be totally impracticable. An additional problem is presented by gates around the development which may hinder an evacuation. Potentially 600 to 1000 extra people from the proposed development would add to existing residents evacuating the area thus making panic and chaos more likely. The internal design of the accommodation blocks, with long narrow corridors, would also hinder rapid evacuation.
- 5.4. **Raised Height of Ground Floor:** In response to concerns about the lowest levels of the proposed buildings being at risk of flooding, the Developer has raised their level. This has the dual impact of making the already over-high buildings even higher, and it will make access for the disabled more challenging as the site appears to be unable to accommodate suitably inclined ramps.
- 5.5. **Impact on Surface Water Flooding:** The physical presence of the buildings will mean that the impact of pluvial flooding will be worse. This may be made worse still by disturbing the course of the old stream (under Stream Court) and the water detected in British Geological Survey boreholes on the site.
- 5.6. The following extract from the Developers Consultants' "Addendum to Flood Risk Assessment" says - Paragraph 9.10: "The EA has advised that the only solution in this area of Exeter is to be part of a wider Strategic solution to provide a Safe Access and Egress route

toward the South East (the closest safe high ground).” This is an old railway embankment that has been identified as a possible solution to serve many development opportunities in the Haven Banks, Water Lane, Alphington Road and Marsh Barton Area. This site would need to access that route, via a new pedestrian bridge over the live railway line.

- 5.7. This vital infrastructure needs to be in place prior to any other development commencing on-site.

6. Infrastructure

- 6.1. We feel VERY strongly that all infrastructure needs to be in place BEFORE any development commences on site. We believe there is a very real risk of promises of infrastructure delivery being reneged on later. Infrastructure delivery should be a pre-requisite to any other construction, not built later. Arguments are often made to descope infrastructure from development projects for all sorts of reasons, not least the costs involved. This has happened so many times in the past and must not be allowed to happen again here.
- 6.2. Royal Devon University Healthcare NHS Foundation Trust submitted their comments and objection to the previous submission of the planning application on 13th January 2023 emphasising that adequate health care cannot be provided under the current infrastructure and funding arrangements if the population of the area increased by the anticipated number of residents.
- 6.3. It is unclear whether the developer has considered the constraints of the mains water supply running along the site to the south edge of block A and whether they will seek to move Block A northwards towards its neighbours once outline planning has been granted. Moving the underground water main would be extremely problematic as the adjacent land is occupied by high voltage electricity cables on the ground owned by the electricity company.
- 6.4. We would like to see the provision of a Community Centre. However, if this is not possible, could we at least ask for some of the Community Infrastructure Levy (CIL) to be put aside to provide much-needed public toilets on this side of the river?
- 6.5. The flood escape bridge over the mainline railway will obviously need to cater for wheelchairs and pushchairs, so could it be built to accommodate cyclists as this will open up the opportunity for this railway siding to provide a traffic-free cycle route and a footpath into Exeter in future.
- 6.6. We note the desire for a low car development, however, pedestrian and cycle access to Exeter City Centre is via an already busy bottleneck alleyway opposite the end of Cricklepit Bridge.

7. Health

- 7.1. The proposed development of 434 flats and potentially 600 to 1200 additional residents in the area poses a high risk to the existing health care provision for existing as well as the proposed new residents.

- 7.2. All four surgeries in the catchment area, St. Thomas, Ide Lane, Southernhay House and Barnfield Hill are already extremely stretched (over 44,000 patients registered) with waiting times for appointments at an all-time high. St. Thomas surgery has a large catchment area and surgeries in this part of Exeter are oversubscribed. Ide Lane has recently been impacted by large new housing developments in Alphington with more under construction now.
- 7.3. Ide Lane is the only surgery taking new patients at this time and is a 33-minute walk or a 9-minute cycle ride each way to and from the site, which is less than ideal if one is sick.
- 7.4. We have noted NHS Devon's objection to the Haven Banks development (21.09.2022) as adequate primary care cannot be provided in the area with the proposed increase in residents.

8. Parking and Local Economy

- 8.1. We don't have any faith in the Developer's car park study on the Retail Park or the parameters within which it was made during the pandemic.
- 8.2. Post Pandemic the Canal Basin is seeing an increase in visitors to the area and this car park, at the weekends especially, is being used by these visitors more and more. (The council car parks on Michael Browning Way are seeing similar levels of use as well).
- 8.3. ECC promote the Canalside / Quayside as one of the areas to visit and explore, visitors will only do that if they can park their cars close to the area.
- 8.4. The charitable running events that take place from Haven Banks in 2023 have seen a big increase in participation levels compared to 2022. parkrun has seen an increase of 90% year on year, and the recently held Exeter Half Marathon and Exeter City 10k have both seen a 40% increase in entrants compared to the 2022 events.
- 8.5. This car park is used by the event participants because quite often the ECC Haven Banks car parks reach their capacity first. Not having adequate car parks for events will put the already under-pressure residential roads, particularly Chandlers Walk, under even more pressure, which could affect the ability of emergency vehicles to respond. There is already a precedent for this in Chandlers Walk.
- 8.6. We estimate the Haven Banks running events' economic footprint for Exeter is approximately worth £500,000, which could be lost to the city if the use of the big car parking areas were lost. This estimate does not include other events, such as the dragon boat racing, Exeter regatta, etc.
- 8.7. Put simply, if we lose parking, these events will go elsewhere and it will have a detrimental impact on Exeter's economy.

9. Trees

- 9.1. Trees in relation to development (Exeter City Council) says: "Increasing demand for housing in the city places more pressure on trees and the natural environment. We aim to ensure that housing growth is balanced and sustainable, but is also achieved without the loss of the

city's character and biodiversity. Well-established trees are known to add great value to new developments. It is desirable to ensure they are retained and protected throughout the development process, and afterwards."

- 9.2. In response to this the developer is planning to remove 24 of the 27 trees on the site (although the report states that removal of hard surfacing and reinstatement to soft ground within RPA (T12, T13, T19 & T21)). Fifteen of these trees are covered by a Tree Preservation Order. On the boundary between the site and Stream Court/Diamond Road the existing mature trees are being removed and then replaced with new ones. It would appear the reason for removal is to facilitate the construction of Block D. We object to this.
- 9.3. All trees are in good condition and not diseased or liable to fall. They were planted specifically to absorb carbon and pollutants from the atmosphere.
- 9.4. No new planting that the developers propose will compensate in carbon removal than that which these mature trees are providing now plus they are giving a home to millions of other small creatures/insects which provide food for the bat population. If true biodiversity in a healthy liveable Exeter is to be achieved cutting down trees of this age and type will be very counterproductive. It is clear that no trees will grow with the high levels of shade that would result from the development.

10. Damage to Existing Properties

- 10.1. Residents are concerned about the structural integrity of their homes and would wish a condition placed on the developer to make good, at the developer's cost, any damage caused to our properties by the developer's works. This condition must include but not be limited to, subsidence, for example, caused by disturbances to the leet under Stream court, discovery and disposal of any unexploded ordinance on site and problems caused by vibrations from building works including piling.
- 10.2. We would wish to have full structural surveys carried out to all neighbouring properties and drains, at the developer's cost to set a baseline. We wish for the developer to have a condition set on their application to put right any damage caused by building work disturbance for up to 25 years. The developer's public liability cover would have to be provided to all neighbouring residents.
- 10.3. As you will know the WWII bomb found at the other end of St David's did serious damage to properties when it was disposed of and we want a condition set on the developer to make it clear they accept responsibility for any damage caused by this sort of situation and any other works on the site.
- 10.4. As we are sure you are aware, the site constitutes Critical National Infrastructure and was targeted during the war, the ground is soft, not every bomb dropped has been accounted for and they didn't all detonate on impact. The developer must have a condition set that they will pay all costs associated with repairing or rebuilding neighbouring properties in the event of an explosion, controlled or otherwise.
- 10.5. We would wish for vibration monitors to be installed and all building work stopped if vibrations are outside of agreed tolerances.

- 10.6. Similarly, we would wish to know how the developer plans to ensure dust is managed, so as not to cause a nuisance to neighbours during construction.
- 10.7. The building foundations in the area are just 18" deep and the building of Stream Court resulted in subsidence to some of the properties. It is feared this would reoccur with the construction of these buildings.
- 10.8. We are also concerned about what measures will be taken to ensure public health and safety when it is revealed the ground is in-fact contaminated.

11. Accessibility / Adaptability

- 11.1. We welcome the provision of wheelchair-accessible parking spaces but cannot see any wheelchair-accessible accommodation, as all of the buildings have steps leading up to them and there is minimal ground-floor accommodation. We wonder whether this design meets the requirements of the Disability Discrimination Act.
- 11.2. If the intent is to house people with limited mobility above the ground floor, what provisions have been made in case of fire (or flood), as lifts will be out of action?
- 11.3. We are unable to find any reference to adaptations made for people with disability to live as equals within this development.
- 11.4. We would like to find at least the simplest adaptations for people with hearing loss regarding smoke and fire alarms in all private rooms and public areas.

12. Views

- 12.1. The 'REVISED Verified Views' document prepared by The Visualiser Ltd (February 2023) only contains 12 views, predominantly from a long distance and missing many key close-up views requested by our group members. The most notable omissions are views from:
 - 12.2. Stream Court from Haven Road looking south towards 9 and 10 Stream Court.
 - 12.3. Piazza Terracina capturing the Old Electricity Building, Waterside and the proposed development. It would be helpful to see what the proposals look like from the old Exe Bridge lamp currently sited on the Piazza.
 - 12.4. A pavement position near the road entrance to Waterside capturing 78 to 74 Haven Road to the right of the image and the full height, width and depth of Block A to the left.
 - 12.5. A similar position looking south along Haven Road captures the frontage of both block A and part of the electricity building on the right and the frontage of the Waterside flats on the left.
- 12.6. We consider these views to be critically important. They were requested around 9 months ago, promised and then not delivered. We were promised all views submitted by residents would be rendered with views of the site. We will therefore continue to create our own impressions of likely views in the absence of the developer providing their own.

- 12.7. Visualisation VP05 shows the treasured green strip being compromised. The roofline will completely obscure the closer hills to the west of Exeter. A Met Office visibility level of at least 'Good' will be needed in order to see the more distant hills at Haldon. Currently, the green strip might still be enjoyed with visibility levels as low as Moderate, as those green hills are much closer. This will change the character of Exeter.
- 12.8. Visualisation VP11 from Chamberlain Road shows the view of the Cathedral would be obscured by the proposed development. This Historic View needs to be preserved as it would otherwise alter the character of the area.
- 12.9. Visualisation VP12 serves no purpose as it does not show any views of the site.
- 12.10. Views of the historic canal will be obscured from several properties in Diamond Road and Haven Road.

13. **Community**

- 13.1. By the nature of the type of accommodation being provided, many of the residents will only stay for a relatively short space of time before moving on, so there will be little incentive to get involved or contribute to the local community.
- 13.2. If the developer genuinely wants the development to have "a meaningful and positive impact on the Haven Banks community", then instead of building more cafes and shops, they could instead provide space for a much-needed Haven Banks Community Centre, as mentioned above.
- 13.3. There are numerous cafes and shops up for sale within a one-mile radius of this site, and in these difficult times, one must question the need for and viability of extra cafes and shops.
- 13.4. Such a centre could then be used for the whole of the Haven Banks community and could promote the reduction of isolation amongst are older population; support young families; provide a space for clubs and organisations to meet and grow their community; and improve the health and wellbeing for all who live in the Haven Banks neighbourhood.

14. **Buildings in General**

- 14.1. The development is not in keeping with the historic nature of the Quay area and reflects the failed '1960s' thinking of how people should be housed in even smaller accommodations than from that era, with all the negative health consequences that will bring.
- 14.2. The development will have a detrimental impact on the skyline and will also impact the proposed residents' mental and physical health, living so close to such a monstrosity of a development.
- 14.3. (BRE 3.3.5) Poor sun-lighting of outdoor spaces only occurs with certain forms of layout. If a long face of a building faces close to due north, then there will be an area of the building that is permanently in shade at the equinox (and hence all Winter). Areas slightly farther

from such a building will only receive sunlight for a limited time at the beginning and end of the day.

- 14.4. This also affects the amenity space provided at the north-eastern end of Block D for the co-living residences. This will make it less attractive for residents wanting to sit out.
- 14.5. Please see the appendices for building specific concerns.

15. Other Concerns

- 15.1. There is no mention of people retaining their right of way across from Water Lane to Haven Road. We are concerned that the site will become a gated community like Waterside. It was originally intended the path through the middle of Waterside from Cricklepit Bridge to the Piazza would be open. We want to avoid big blocks of land being cut off making the whole area a less easy to navigate on foot or by bicycle
- 15.2. We are concerned about the increase in Traffic, especially from deliveries. The developer's estimates of the numbers of delivery vehicles are wildly at odds with our own and we'd be interested to see the assumptions that have used.

Once again, we reiterate, we are in favour of the development of this site into a residential neighbourhood, only on a more sensible scale than these proposals.

Please do contact us if you would like to discuss any of the points we have raised. We are always open to a face-to-face meeting or site visit if you feel it would help.

Yours Sincerely,

Dr K James
On behalf of the Haven Banks Residents Group

Appendix A - Block A Specifics

- A1. We welcome this block being moved further away from its neighbours, however, despair at the addition of extra stories to an already overly high building.
- A2. With reference to the change in the design of building A, potential access (with permission from the land owner) to the rear of all of the properties backing onto the development would significantly impact building/maintenance/ scaffolding work that will be required in the future on an ongoing basis.
- A3. If there is access to the rear of building A, who will have access?
- A4. If it is open and accessible to the general public, there is potential for antisocial behaviour and the threat of crime on the Diamond Road properties.
- A5. If it is gated, will the residents backing onto it have access for the maintenance of their properties?
- A6. The overall height of the new structure will still significantly impact the overall natural available daylight to the rear of Diamond Rd properties and on the opposite side of the Waterside Development, especially through the winter months.
- A7. The air source plants at the rear of the structure are still a concern, with regard to the noise levels that will be emitted 24 hours a day. No provision for extractors from kitchens has been made.
- A8. There are still problems with potential noise issues in the surrounding area with regard to the proposed commercial developments being so close to existing residential properties.
- A9. The overall re-design of the development has still not addressed the original vast majority of public objections, in regard to scale, mass, density and height.

Appendix B - Block B Specifics

- B1. The resubmission concentrates on the visual aspects of the design and ignores the vast majority of the public objections regarding scale, mass, density and height. The redesigned Building B remains too large, too high, of poor design and a monolith totally out of keeping with the surrounding area. This new 'tenement building' will overwhelm the nationally acclaimed 'Exeter Power Station', which is a locally listed building, currently housing the Exeter Climbing Centre.
- B2. The close proximity of Building B has the potential to disturb the foundations and structural safety of the Climbing Centre, The Coolings residential building and other adjacent residential buildings at 1 to 4 Maritime Court.
- B3. Whilst a minor design adaptation has been made to recess the windows of the eastern flank of the building, therefore reducing the view into the bedrooms of The Coolings, an oblique view still allows a view into the bedrooms from a distance of approximately 5 metres. This remains clearly unacceptable and severely impacts the residents' privacy.

- B4. No mention is made of reinstating the blocked 'Fire Escape' route from The Coolings.
- B5. Building B remains a building of overpowering brutalist design and as a whole, if allowed to proceed, the development will create an Exeter 'Gorbals' of the future.

Appendix C - Block C Specifics

- C1. Whilst there may be improvements to the flats and internal circulation areas, nothing has been done to improve the external visual qualities of the block. The block still has the appearance of a utilitarian commercial building.
- C2. The scale, mass and height of the building are totally out of keeping with the surrounding area and it is overbearing and overshadows neighbouring properties the majority of which are two or three storeys.
- C3. There are numerous terraces around the building. The houses of Chandlers Walk and Maritime Court are going to lose privacy with terraces overlooking the houses and gardens from all levels of the building, including its roof garden.
- C4. The roof garden will undoubtedly be a popular meeting area for residents, particularly in the summer and it is envisaged that it will become a party area. Late-night noise will carry across the neighbouring area disturbing residents.
- C5. The building will reduce daylight and will also shade gardens, in particular during the summer afternoons.
- C6. There does not appear to be a service area for Block C or a bin collection area shown. There is a parcel room that has an external access door shown but no drop-off point for delivery vehicles.
- C7. Providing the car park adjacent to the rear gardens of Chandlers Walk is going to increase pollution in the area, whereas when the retail units were operational, the traffic in the lane was no more than a bin lorry and 3 or 4 deliveries during the day. With the proposed car park, there is a potential for noise from vehicles 24/7.
- C8. The tenants of the current retail units installed CCTV and lighting units along the lane with a total disregard for the fact the boundary wall is owned by the residents of Chandlers Walk. They did not even consult on the proposal and attached lights and cables to property that was not in their ownership. Would these installations be removed as the resulting light pollution affects bedrooms? There also used to be regular sightings of bats in this area but the lights have affected their routes.
- C9. The residents will need assurance that access to the wall and garages backing onto the lane will be retained for maintenance, e.g. clearing guttering on the garages.
- C10. Two sub-stations are shown backing onto properties in Chandlers Walk. Some sub-stations emit disturbing noise and assurance would be needed that these would not cause noise issues.

Appendix D - Block D Specifics

- D1. A lot of changes have been made during the resubmission of the plans for this building. We object to them as follows:
- D2. Whilst it is a positive move to improve the amenities, such as new lounges being placed into the curved corners of the ground floor, 1st, 2nd, 3rd and 4th floors and the increase in kitchen sizes on 1st, and 2nd floors, some rooms have become isolated between Private Dining areas and the kitchen. These rooms could be liable to neighbouring noise nuisance. The other lost rooms are now small rooms on the third floor increasing the likely congestion in the kitchens which have not been increased in size. Extra rooms have been placed in areas where Plant is no longer required.
- D3. We object to the high density of residents in this building and this design does not address the long corridor nature of the internal layout. It has been shown in the 1960 Greater London Council redevelopment areas that corridors were uncomfortable places to meet.
- D4. Numerous fire safety concerns, some of which we've already mentioned in Section 2.
- D5. Turning to the external features, the original objections made were against the mass and mono-block design of the building. The Urban Design Officer requested a more active and interesting rear elevation that would be seen by residents in Diamond Rd and Stream Court. This has resulted in a secondary frontage at a higher level on the rear of the elevation. It is claimed that the top floor now has added interest with its extra canopy features and updated external features on the corners. We were not able to find these features interesting as they appear to make the design higher and not address the main bulk of the design to which we object.
- D6. It is noted that the increase in the size of the kitchens on floors 3 and 4 shown in NE Elevation 3 and SW Elevation 3, has allowed the balcony and outside area to become more of a populated viewing area over the gardens of 9, 10 & 11 Stream Court. These balconies also look down on the social roof garden and it is easy to imagine the temptation for noisy group behaviour between opposing balconies and the roof garden. They are an intrusion on the privacy of occupants using the gardens of 9, 10 & 11 Stream Court. We object to the siting of these balconies on the grounds of privacy and the nuisance of noise by residents using these areas inappropriately.
- D7. Visualisations of block D have been provided from Diamond Rd where it is only possible to see the eastern end. A more illustrative view of the impact this building will make on the locality should have been provided from the viewpoint at the Stream Court road junction. Residents have consistently asked for this viewpoint to be provided without success. The developers failed to provide these.
- D8. Other concerns relating to the exterior, including those made about the security at the rear of building D, have not been addressed. A wooden fence of 1.9 m was offered to secure the boundary between Stream Court back gardens and the access to bin rooms and the bike storage. This area, adjacent to the rear exit, is hidden from sight. Therefore residents have suggested installing CCTV, along with movement detector-controlled lighting, to dissuade loitering and anti-social behaviour.

- D9. It is appreciated that the bin areas have been shared to different positions along this north-facing wall and that the access to the bike storage is described as secure. However, no measures have been proposed as to how security will be achieved in these areas.
- D10. The RGP waste management plan, July 2022 states that the equivalent of 18 x1100 litre bins will be removed from Block D every week. This amount is calculated for one occupant in each room. It is a vast underestimate as the rooms allow double occupancy.
- D11. Paragraph 5.25 concedes that operational targets should be set by site management to encourage staff performance as "Resident behaviour is difficult to manage and waste management procedure cannot be easily enforced". This is a problematic approach.
- D12. It is proposed that refuse is being removed in vehicles using the 'service road' between the Cornerstone social housing building and the current enclosed site. This 'service lane' is now an unregistered piece of land that does not appear at HM Land Registry under Title no: DN456511 which is the Haven Banks Retail Park. The 'service road' appears to have been swallowed up into the land despite the fact that there is a right of way over it on another title.
- D13. The mass and height (26m) of Block D and its orientation (40 degrees from South) running parallel to houses 7-14 Stream Court produce an imposing north-facing wall towards these houses' sole ground floor room and overshadow their south-facing gardens.
- D14. The loss of sun in our gardens is a result of overshadowing by Block D. It will change the nature of the gardens and their amenity use throughout the year. In Winter the ground is less likely to dry out and the moss and slime, which are normally present in the winter, will remain longer as the Spring and Summer sun is limited by our gardens' reduced total daily amount of sun. The BRE states that 'the sunlit nature of a site can be enhanced by preventing overshadowing'.