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Mr Howard Smith
Planning Services
Exeter City Council
Civic Centre
Paris Street
Exeter EX1 9SA

7 October 2022.

Dear Mr Smith

22/1145/FUL | 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. | Haven Banks Water Lane Exeter Devon EX2 8BY

The Society's Planning Group and Strategic Planning & Highways Group have studied this application accept the mix of commercial and various residential uses, the general layout, the improved pedestrian/cycling accessibility between Water Lane and the Basin & Quay, and the low-car usage principle. We especially support the efforts made for pathways and community spaces within the development, the greening and planting where possible, including trees and shrubs. We think with the development's location being close to major natural and recreational sites residents will have access for recreation and leisure activities.

Because of the many inadequacies with the proposals highlighted below the Civic Society objects to this application. We hope that the developer will acknowledge the level of objection to this application and submit amended proposals which are more acceptable, in response to people's concerns. They clearly have not done this to date. It is concerning that in the applicant's Planning Statement they suggest that council planners have given tacit support for the current proposals in pre-application discussions.

We do not object to the scale of blocks A and B which we consider appropriate for the site, with the applicant having taken care to take account of existing properties and the impact on local residents.

The applicant states that they have reduced the height of buildings from a possible 10 floors to a maximum of six as part of the pre-application discussions with planners, and presentations to the Design Review Panel. They suggest this as being a positive change to

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justify the scale of the development, with a few token adjustments of 'setting back' where the massing imposed too greatly upon neighbouring homes.

In the Planning Statement the applicant quotes several paragraphs from the NPPF, including in paragraph 5.15 Paragraph 124 goes on to state that planning policies and decisions should support development that makes efficient use of land, taking into account the identified need for different types of housing, local market conditions and viability, availability and capacity of infrastructure and services, the desirability of maintaining an area's prevailing character and setting, and the importance of securing well-designed, attractive and healthy places. And in paragraph 5.16 Paragraph 130 states that planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, are visually attractive, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site and create places that are safe, inclusive and accessible and which promote health and well-being.

In this sensitive area near the historic canal, and where past residential development has increased in height a little each time to respect neighbouring properties, we do not see how the NPPF guidance for 'the desirability of maintaining an area's prevailing character and setting', 'the importance of securing well-designed, attractive healthy places', and 'that developments will function well and add to the overall quality of the area, are visually attractive, are sympathetic to local character and history, establish or maintain a strong sense of place', is remotely met by these proposals.

Blocks C and D are still out of proportion for the adjacent terraced buildings of older origin despite setting the upper levels further away from the boundaries and creating building shapes broken down into a range of smaller forms. The flat roofs of buildings C and D are out of sync with the gabled roofs of the buildings around them, and the dark metal cladding of the upper level of both buildings undermines the lightening impact envisaged by the reduced footprint of this level. The overall height, especially of Buildings C and D, is too great and should ideally be no higher than the roof line of the Climbing Centre. A reduction in height of these buildings will bring the number of units more into line with what can be expected in a suburban area of high density developments. It will also slightly reduce the looming effect of building C over Chandlers Walk to the south and the possible over-shadowing by building D of Stream Court and Diamond Road to the north.

We wonder the introduction of other materials to the fenestrations will help soften their appearance, perhaps timber cladding, which would bring the building in line with the history of the area which at one point was dominated by a timber yard. Further measures to lighten the impact of the new buildings could include wall greening, as this can decrease

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the environmental impact by adding to the wildlife corridor feature of the central axis of the development. Furthermore, elements of wall greening can help regulating the heat pattern within the site, besides having a calming effect on the residents living there.

In the current reduced scale, the whole site still proposes a mix of 246 purpose-built BTR homes and 188 co-living homes, alongside several commercial units for variable use on what is a 1.1 hectare site. If 3 co-living rooms are taken as a unit, this will mean $246 + 63 = 309$ units on the 1.1 hectare site, resulting in a density of almost 300 units per hectare. High density housing in suburban areas like Haven Banks is typically 50-75 units per hectare. The density of the application is well above this and must be reduced.

We find that most of the individual Co-living rooms are too small and the communal areas, although improved, are not adequate (certainly not generous as stated by the applicant) for the intended number of residents. Co-living design is ostensibly based on designs and concepts for student accommodation where typically six rooms share a communal kitchen and living room. But in block D, the number of studios sharing a communal room ranges from 16 on the third floor to 30 on the first floor. We also think the Wewash room looks far too small to support the number of residents who will rely of this facility to wash and dry their clothing.

Reducing the number of co-living units will be supported by the 132 one bedroom units for 1-2 people occupancy, so that the co-living units can become a real stepping stone for young individuals and couples to settle in this area and continue to feel part of a community.

In terms of the 'Energy and Sustainability Statement' the choice of air source heat pumps for the warm water production on site, and photovoltaic modules on roofs to support the generation of electricity as the two basic features on the site is welcome. It would be good to add to this by considering building integrated photovoltaic solutions, such as cladding (as alternative to the metal cladding of the upper level) and solar voltaic glass panes for windows, though we understand that it might be a bit too early for the later to take this into consideration at the present point in time. Should, however, there be any delay in the construction (e.g. due to the changing economic circumstances), it would be good to consider this option, as it is only a very short distance away from being introduced into the main market.

Contamination of the soil beneath the entire site is probable as it was at one point in its history the coal and coking yard of the Electricity Station from 1900; therefore a deep investigation is essential, not just scattered bore holes. The investigation should also reveal

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the course and condition of the stream known to run beneath Stream Court and part of the existing car park. Reports of both should have been included in the application.

The water management for the site does not include considerations of grey-water recycling which should be possible in rental accommodation with an on-site management team. There is not much said about rain-water storage on site in order to deal with climate change-related issues. We hope the water and drainage authorities will encourage this.

In respect of waste disposal and recycling, we question whether small apartments and studios have adequate space to separate waste to the extent that the city council aspires to with their new waste management strategy to improve recycling rates in the city. How will the management company ensure there are sufficient and adequate bins available to separate waste, including the new requirement to separate food waste? In addition, we are concerned that large commercial waste containers should not be placed on public pavements on collection day because they will block the safe passage of pedestrians, wheelchair users, and those with pushchairs. The applicant should make provision to place bins within the site boundary.

Low car use communities are a positive approach in Exeter to reduce car use, particularly single occupancy journeys, but we have concerns that the very low number of cars suggested for this development may act as a negative filter for those who can live in such developments. The applicant expresses expectations that future residents of the co-living accommodation will 'include young professionals, key workers in health and other sectors, local people looking for their first independent home, those new to the area or with a local work connection that need a flexible contract. It suits a range of ages and personal backgrounds'. They do not express any expectations for those who may occupy the BTR apartments. Is the net number of car parking spaces of 25 sufficient for the number of people who need a vehicle for their business such as builders, carpenters, plumbers, etc.? The developer states in paragraph 4.3 of the Planning Statement that 140 places were originally planned for, and has been reduced to 32 as a result of discussions with the City Council. A higher number of spaces should be considered, or the Travel Plan should include advice and guidance for such residents to continue with their work pattern. We wonder whether a two-storey solution for the car park on site would be possible to at least double the number of parking spaces.

The developer is proposing just 2 disabled parking spaces on the basis that typically 5% of parking spaces are allocated for disabled drivers. But this argument is flawed, the 5% is a percentage of users, visitors or residents. So for this development of 434 homes the 5% represents 21.7 spaces. Will the developer be restricting the number of residents with a

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disability to two? And how will any disabled resident of the co-living accommodation access the parking spaces, or will they be discriminated against and refused accommodation?

We support the provision of co-cars for the residents of this development, and we hope that a range of vehicles will be provided to support their needs. The applicant offers to provide five co-cars on land outside of the parking areas gates so they are available to the wider community, but the plans only show four spaces. Where does the applicant intend the fifth space to be?

We respect the applicant's right to develop this site and that will result in the loss of the 205 car parking spaces that supported the retail units that will be replaced. The car park has become a convenient and cheap car park for those visiting the canal basin area, whether to use the adjacent climbing centre, visiting the area, or to use the water sports facilities, but it must be recognised that those who have used the car park will now use the Michael Browning Way car parks. This will result in the typical 40 vehicles an hour using the existing car park travelling along Haven Road, passing the climbing centre, businesses and homes on the way. Due to on street car parking this will add an element of congestion on this road at a time when city planners should be looking to reduce traffic and give the road pedestrian priority. The applicant should be asked to make a contribution towards traffic calming measures, and to develop a new road junction between Michael Browning Way and Water Lane to provide an alternative access to the area.

We are concerned that the size of the two laybys proposed on Water Lane and Haven Road are not large enough for the two vehicles the applicant says they will accommodate. The Travel Assessment shows how one delivery vehicle can enter the laybys but not a second vehicle. Additional vehicle tracking should be requested to demonstrate that this is possible without mounting the pavement.

The applicant states that there will be a new cycle hub provided on the site but this does not appear to be shown on the plans. There should be a large number of Sheffield cycle stands to accommodate people visiting residents in the development who are clearly not able to visit by car.

The Transport Assessment quotes the city council's cycle parking standards as one space for 1 & 2 bed homes, and 2 spaces for larger homes, but this ratio is totally inadequate for a low car ownership development. The applicant forgets that the cycle standards quoted are for traditionally built homes that will also have one or two cars. It will therefore be more appropriate to provide at least one cycle space per bedroom – 589. If the total possible occupancy was taken into account (e.g. a 1 bed 2 person flat may have two adults) then the total number of bike spaces may be much higher. In addition, the

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applicant fails to recognise that many who embrace cycle use may own cargo bikes, have family trailers, or wish for a second bicycle for sports use. The applicant should provide an improved cycle parking analysis undertaken by a cycling specialist.

We are disappointed with the Travel Plan. It is clearly written for a car centered development, and by a car centered author. The travel plan can obviously work from a pedestrian and cycle base because of the lack of car parking spaces on site. A revised outline travel plan should be requested that has been prepared by a consultant with green travel credentials.

The applicant indicates how the development has good connections for pedestrians and cyclists to existing pedestrian and cycle routes. This includes a route from Cricklepit Bridge across the Higher Leat to the quay, but with the removal of Mallinsons Bridge this route is no longer available. Instead, pedestrians and cyclists use a narrow path to Commercial Road which is already inadequate. The applicant should be asked to make a contribution towards the proposed replacement for Mallinsons Bridge to mitigate the expected increase in 'traffic' on this route.

Further afield, the Trews Weir suspension bridge and the bridge over the flood relief channel provide access to the high employment zones provided by county hall and the RD&E hospital. However, both are far too narrow to accommodate additional pedestrians and cyclists. The applicant should be asked to make a contribution towards widening these bridges to mitigate the expected increase in 'traffic' on this route.

In addition to the suggested raised surface on the length of Haven Road between Piazza Terracina and the site (to encourage pedestrians to cross to and fro) a similar length is needed on Haven Road north of the site to enable safer crossing to the existing equipped playground because there is so little activity space for children on the development. The proposals include 113 units with more than one bedroom, and DCC analysis for school age pupils expects 0.25 primary age children, and 0.15 secondary age children per unit; this equates to 45 school age children.

Yours sincerely

A handwritten signature in black ink that reads 'K Lewis'.

Keith Lewis
Chairman

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