



FRIENDS OF EXETER SHIP CANAL

Britain's oldest pound lock canal

Exeter: A Heritage Harbour

6th October 2022

Howard Smith
Principal Project Officer
City Development
Exeter City Council

Dear Mr Smith

Haven Banks, Water Lane.** 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. **22/1145/FUL

The Friends of Exeter Ship Canal wish to object to the planning application for the Haven Banks redevelopment. We believe that the proposed redevelopment as it stands would thwart current plans for the revival and long-term future of the canal, its basin and the surrounding waterside area.

This is a critical time for the Exeter Ship Canal, one of Exeter's most important assets. The canal and its environs offer an invaluable opportunity for forward thinking, low carbon impact developments that bring new employment and recreational opportunities to the city alongside well planned housing.

As a voluntary group, we secured the prestigious Heritage Harbour recognition for Exeter and are working alongside Exeter City Council and Exeter Canal and Quay Trust to follow a projected Route Map for the future of the waterway and waterside. This will encourage the development of a busy harbourside that will include boat restorations and building, new and traditional skills, more and varied use of the waterway by passenger and other boats, a showcase for heritage and increasing visitor activities on and off the water.

The Haven Banks proposals acknowledge 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.' This means it is vital there is strategic thinking by all parties

involved in the wider area to ensure the redevelopment takes advantage of the opportunities and does not block off a water-based renewal for Exeter for generations to come.

In particular, our objections to the current Haven Banks redevelopment proposals are as follows.

Residents' needs and visitors' parking

The site closely interacts with the waterside that is Exeter's second busiest tourist attraction. If, as is planned, the canal and basin become increasingly busy and popular as a workplace and leisure attraction, parking for the associated traffic must be adequately protected and provided for.

While the sustainability goal of reducing car usage is supported wholeheartedly, we believe that a more realistic approach is necessary than is shown in the application. Car ownership will not disappear overnight, so housing developments that provide only very limited parking indeed will cause an undesirable knock-on effect on parking in the nearest available spaces. 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 have '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 a review of parking arrangements across the wider area and that the Michael Browning Way car parks must remain to support visitors and water users.

The application makes provision for just 32 car parking spaces, including 2 disabled and 5 car club parking spaces (6.126), despite there being new 434 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. Point 6.6.2 says the Transport Assessment authors have 'engaged with car club operators ... in order to determine a suitable quantity of car club vehicles.' 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.

In addition, 485 cycle spaces are proposed, 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.

When 434 new homes are built there will be much higher numbers of people accessing the site, not just residents but also their associated visitors (friends, family and deliveries). The proposed new commercial units also will all have staff, customers and deliveries requiring parking space easily nearby.

Road access to the canal basin area

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. The Friends recognize there is a lot that is attractive in the traffic calming idea but the application should not be approved until 1. Road infrastructure and management in the wider area has been considered; 2. The necessity for heavy vehicles such as cranes and boat transporters to reach the basin and its improved facilities has been taken into account as a priority for the area.

For the Haven Banks redevelopment, this means:

i) traffic calming measures on Haven Road and Water Lane should be designed to allow for the free passage of large wagons such as cranes and commercial sized boat delivery trailers

ii) pinch points should be prevented; we believe pinch points would arise as a result of the Haven Banks development because random parking in unsuitable locations will be caused by both inadequate long stay parking provision for residents and visitors, and inadequate short stay parking for vehicles delivering to residents and businesses.

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 considerable distances not just local. Adequate road access is essential.

We believe the current application does not address any of these points with the necessary attention.

Cycle safety

Existing cycle paths are not up to the necessary safety standards. The Haven Banks proposal includes 485 cycle parking spaces. That number of additional bicycles has implications for the canal towpath and cycle path from the canal basin to Salmonpool Bridge. Cycleways need to be the correct width and separated from pedestrians and the towpath to give safe routes to both pedestrians and cyclists.

Assuming that the Water Lane development has similar aspirations for large numbers of bicycle users, the canal's towpaths which are already well used could become so to the point of being dangerous to all types of user, especially if additional weekend and holiday users are counted. The increased numbers will also pose danger on other, often already congested, paths and pavements. Once again, lack of connection

between this application and the Water Lane redevelopment, and absence of a strategic cycle plan, are demonstrated.

There are knock-on consequences for the accommodation for cycles at Exeter St. Thomas and Marsh Barton railway stations, both of which the application highlights as assisting transport for the development's residents and visitors. The canal towpath to Marsh Barton station represents a more pleasant and safe route for pedestrians and cyclists to access rail services than the busy road route to St Thomas. The application leaves these issues to sort themselves out.

Building design and overall planning

The development site is part of a wider waterside area of Exeter where the planning, scale of buildings and use will set a seal on the south of the river in Exeter for future generations. It also borders on the valuable heritage zone of the canal, basin and quayside. A living and changing variety of interest and activity on the canal can only be good for adjacent housing and add to the joys of life for the people there, and for the benefit of everyone, locals and visitors. That requires focus and background knowledge in terms of the planning and traffic management, which we believe this application lacks.

For the above reasons we trust the application will not be approved until proposals are developed in more detail.

Sincerely

Sandy Wright
For the Friends of Exeter Ship Canal