

Haven Banks Residents Group – Comments on Exeter Plan – December 2022

This is the collective response of the Haven Banks Residents Group. There are positives and negatives to the proposed Exeter Plan and we agree brownfield sites should be developed. However, in terms of the specifics of the Exeter Plan, having both local knowledge and much more broader experiences of developments, we have the following observations:

Density & Design

- "Making the best use of previously developed land in the city by optimising density" - optimising density seems to mean cram as many units in as possible. It would be helpful to mandate metrics (such as the number dwellings per hectare, and the floor area of each dwelling; for example, the average density in Exeter is currently 12 dwellings per hectare) which ensure that residents have a meaningful space to live in.
- Design D1 states "Ensures that the scale, massing and height of buildings, extensions, and other structures relate well to the site, the surroundings and to human scale". However, there is no evidence that this policy was adhered to in the proposed Haven Banks development. What will be done to ensure that this policy will be followed?
- The government has advised that local authorities can apply for Investment Zone status. Their guidance makes clear that eligibility for this scheme is conditional on councils agreeing to adopt a "new streamlined overarching planning system" intended to fast-track planning consent. We are concerned that involvement in such a scheme will lead to a reduction in basic standards in the planning process.

Environmental

- In order to achieve Exeter City Councils carbon neutral goals, new developments must follow Passivhaus principles and be carbon neutral.
- The plan makes no mention of how the multiple 132kV power lines will be dealt with. Will they be moved underground, or will they remain near to residential properties?
- The plan says that "Steer development to avoid areas of higher flood risk where possible", and then goes on to say how this can be circumvented (Policy CE3). CE3 indicates how pluvial flooding from within each area might be minimised, but says nothing about the more relevant and dangerous risk of river flooding.
- Exeter must seek to maintain its position as one of the top five places to live for tree coverage.
- Existing views of countryside and bodies of water, such as the River and Canal, must not be compromised.

Infrastructure

- Low carbon reliable transport infrastructure needs to be in place prior to any development commencing.
- Too much strain in the infrastructure of the area including the NHS.
- The strain on Water Lane as far as traffic is concerned going into Alphington Road is overbearing at present without this project.
- The plan suggests that residents will have electric cars/bicycles, but in reality they will buy their own cars and parking is extremely bad in the Haven Banks/West Gate area, especially as all car parks in this area are being earmarked for development.
- The Tenpin Bowling car park holding over 244 spaces is possibly being developed into co-living and apartments for rental leaving 33 spaces. Where are visitors/tourists to the quay going to park?
- There is a need for a detailed infrastructure plan for the wider Water Lane area.
- The Countess Weir Sewage Works spilled sewage for over 200 hours in 2020. With more homes the load on the works will increase and the length of spills is likely to increase. Will investment be forthcoming to remedy this?

- The plan states that “Community Facilities: Facilities which serve neighbourhood needs should be located within or close to district or local centres or at locations easily accessible to the local community, particularly by foot or bicycle.”. It would be very helpful if the scope and location of these facilities could be developed early in the planning stage.

Open Space

- The plan says, “Deliver a vibrant garden community”. There is little or no evidence of open spaces, parks etc. in the material presented. And it seems to be at variance with what is happening in Countess Wear where they are planning to build on a valuable community green space.
- If the Council advocates retention of existing green spaces why will the Grace Road Playing Area be built upon?
- The plan proposes a “vibrant garden community”. To ensure that the garden aspect is met the plan should mandate both the amount of open space (e.g. parks) and space accessible to residents immediately outside their dwellings.
- Strategy 8 says “enable development in locations which link effectively to the Valley Parks as vital green infrastructure whilst ensuring their protection and enhancement.” It is unclear how this will be achieved.

Heritage

- The History & Heritage mentions the Cathedral, the Roman Wall, and archaeological remains but has no mention of the Quay or the Historic Ship Canal.
- "Development that contributes positively to an area's character and identity" - no evidence of this in the Haven Banks proposals.
- "Outstanding quality. Development will: Enhance Exeter's natural, built and historic environment, particularly at ... the Ship Canal and Basin, the River Exe" – there was no evidence of this in the Haven Banks proposal.
- Recognition of Quayside as ‘Heritage Area’ with no large-scale or impactful developments permitted.
- On the Quayside, specific buildings, or their shape and structure, must be preserved. These include The Sea Scouts building, the current Harbour Office, the bricked-up building at the entrance to the old gasworks and the shape and dimensions of the buildings immediately adjacent to the Quayside currently occupied by the Canoe club and Cycle Charity.
- We say no to all overdevelopment in cultural and scenic historical areas.

Housing Standards

- There must be minimum standards for co-living such as a maximum number of people sharing kitchens and other communal spaces; and rules around the amount of space provided for people to live in equivalent to C3 homes.
- If the Council are serious about quality, heritage, affordability why are they allowing multiple co-living blocks to be brought forward? This model does not appear to be sustainable; one large provider (The Collective) has already gone into administration.

Health

- The vision states “every resident has a home that is secure, affordable and healthy”, this is not referenced in the 7 key outcomes for Exeter 2040