

Mr Howard Smith
Planning Services
Exeter City Council
Exeter

By email

12 March 2023

Dear Mr Smith

22/1145/FUL Scheme Amendments | 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.

Please accept this revised objection to this planning application. Our previous letter of objection is no longer relevant with some issues addressed by the developer.

The Society's Planning Group and Strategic Planning & Highways Group have studied the amendments to this application and 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 support the adjustments to pathways, community spaces and communal gardens within the development, improved greening and planting, including trees and shrubs. We think with the development's location being close to major natural and recreational sites residents will have access to additional recreation and leisure activities off site. We are disappointed that despite offering 1-3 bedroom apartments, the proposals still do not provide any children's playground or teenager amenities, these recreational areas would be needed for Blocks A, B and C.

The amendments extend to a slight reduction from 246 purpose-built BTR to 241 and from 188 co-living homes to 185, slightly reducing density; changes to internal layout, especially for cycle storage; but the height of the buildings is unchanged. The amendments are more 'refinements' to the June 2022 application than major changes, with the exception of what is suggested for Building A and some footprint change for the south-east end wing of Building C. We understand that the amendments are made in the context that the scale of the project is needed to justify the operational management envisaged for the site after completion. We have seen smaller co-living facilitated developments elsewhere in the city so we are not sure that this is a justification for this overbearing development in this location.

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.

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.

The Daylight and Sunlight Report' based on the methodology set out in the BRE 'Guide on Site Layout Planning for Daylight and Sunlight', 3rd Ed / 2022) seemingly explained why the impact on adjacent buildings is probably less than it could be expected for buildings of this size, and that is mainly due to the positioning of the buildings with regard to sunlight. The shadow diagrams in two hour intervals (pp.26-30) though are all related to the 21st March Equinox. We expect the December shading levels will be considerably higher with the sun being lower in the sky. If the 21st March measurements are (just) within the acceptable limits of what can be accepted in an urban development, we wonder whether December readings would be below acceptable limits. Can these be provided?

We do not consider the adjustments to the design of the buildings mitigate the impact on adjacent homes through design and material changes rather than substantially reducing the massing and height of the proposed development. We understand the necessity for higher density building on sites like this in Exeter, as explained in the Draft Exeter Plan from late 2022, but we still consider the height of the development to be significantly too high. To keep more in line with the surrounding buildings and reduce the impact of the development on the existing neighbourhoods all around it, four storeys would be more appropriate as Block B. We think being in the middle of an already built-up area, the impact on existing neighbourhoods should become a priority for the new development, as old and new need to integrate as much as possible and not create tension and friction.

In the current reduced scale, the site still proposes a mix of 241 purpose-built BTR homes and 185 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 241 home + 62 (co-living) = 303 units on the 1.1 hectare site, resulting in a density of almost 300 units per hectare (dph). This is well above what LDA

Design's 2021 'Exeter Density Study recommends as a minimum for future development in this area at 120 dph. To put this into context the same study lists an existing Haven Banks development with 80% apartments and 20% houses at 114 dph and a newer New North Road mixed use urban development of 5-6 storey blocks along the railway line near Central Station with 100% studios at 193 dph. We think these examples together with the recommendation for future development should define the limits for the new Haven Banks development as between 120 and 200 dph. If development elsewhere at these lower densities is viable, it should be possible at this flat and accessible site.

Because of this central issue and remaining inadequacies of the proposals highlighted in our response further down, the Civic Society still objects to this application.

Building A

Whilst block A now has a much reduced footprint in response to the concerns of neighbours in Diamond Road and on the corner of Haven Road, we do not think a 5 storey block is acceptable (up one storey from the previous plan): it is much higher than the houses (No 16-33 Waterside), and this building sticks out unnecessarily in more distant views. It looks alien to its surrounding on the skyline.



There is no need for this block to create a 'key entrance point into the site' with 'a greater sense of arrival [...] is not a convincing argument. Instead



this block should bridge between the heights of adjacent buildings on Haven Road. The Waterside development creates a sufficient sense of arrival to this area, and 5 storey building on this site will only create a tunnel effect to Piazza Terricina. The Haven Road elevation of this revised building is a slick unstructured

façade and predominantly one colour of brick offering no interest. It should be improved.



Building B

We approve of all suggested changes and think this building with its 4 storeys and pitched roofs fits well with its neighbouring buildings. 18 1-bedroom and 2 2-bedroom flats again provide a good stepping stone from Co-living. The mix of red sandstone, red bricks, some grey projecting window framing and lighter grey roofing provides a good amount of interest.

Building C

With 99 1-bedroom, 75 2-bedroom, 26 3-bedroom and 1 duplex 4-bedroom apartment this is the most diverse building of the development. This mix could be family orientated and one would expect dedicated children spaces coming with it, of which we do not find any statement in the application. The communal garden space on the south-east side of the building would be the best place for them in terms of safety. The developer should be asked to contribute towards an improved crossing of Haven Road to give children safer access to the play area adjacent to the riverside path, and perhaps for an extension of that play area, if the plan is, as it was explained to us at a meeting with the developer in December 2022, to provide housing for young people from single young professional to marriage and family life.

This predominantly 6 storey high building, is in terms of massing the highest of the four buildings. The middle and western end of the building faces away from Chandlers Walk due to the green spaces and parking arrangements. The only exception seems to be at the southern tip of the eastern end, where a triangular section of land at the rear of the Chandlers Walk properties was added. We wonder whether this addition impacts too much on 19-22 Chandlers Walk, though there is some screening by trees and, due to the direction, not much more shading is to be expected.



The changes to this block are a 'cosmetic' effort to counteract what is the main



Isometric showing extent of roofline changes to Block C

problem, the 6-storey height of these parts of the building.

The revised massing at the Water Lane end of the building, contrary to other measures, makes this part of the building look more



massive than the stepped approach in the previous layout. We think that the change is contra-productive and moving away from the better solution before.

The flat roofs of buildings C and D are out of sync with the gabled roofs of the buildings around them and even with Building B. We are not convinced by the use of dark metal cladding at level 4 and partly at level 5. Some lighter coloured elements of the top floor cladding already demonstrates this (see illustration on the previous page).

We wonder whether the introduction of other materials to the fenestrations will help further to soften their appearance. Further measures to lighten the impact of the new buildings could include wall greening, as this can decrease the environmental impact by adding to the wildlife corridor feature of the central axis of the development. Elements of wall greening can help regulating the heat pattern within the site, besides having a calming effect on the residents living there. All of this would support the roof garden planting with bushes and multistem smaller trees which the developer puts forward as an important element in terms of the green credentials and leisure use of the top-floor middle section.

Building D

The improvements at the northern end of the building help with some of the concerns raised about the impact of the building on Diamond Road. What is suggested now is certainly looking more interesting. But the overall difference in height remains an issue here and for the adjacent buildings of Stream Court.



We approve of the adding of canopy features on the southern side of the building, which according to the developer have ‘the effect of breaking up the top floor, reducing the building’s appearance as a single mass, particularly in long range views’. This reads like an acknowledgement of the overall height issue of the development. The perception of height is not helped by the dark metal cladding of the top floor. Our suggestions for Building C applies here as well. Again it will further highlight the already introduced garden features on the upper stepped-floors.

We still have concerns about the size of the Co-living rooms: almost all rooms on

the ground floor and the 1st to 3rd floor are 20.1sqm. We are yet to be convinced that this is adequate space for a single person to call home. On the 4th floor room sizes between 26.4 and 30.8sqm are obviously better with kitchen/diner/lounge areas.

We acknowledge the further improvements in communal areas in the revised design of Building D by adding what is described as 'generous communal lounges' to the two curved corners of the building at all levels but the top floor. These come in addition to the lounge/kitchen areas already proposed. At ground level kitchen areas now have been included. However, we still don't judge all of this 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 the communal spaces ranges from 16 on the 3rd floor to 26 on the 1st and 2nd floor.

We also think the Wewash rooms, though multiple, look far too small to support the number of residents who will rely on these facilities to wash and dry their clothing.

Car parking and bicycle storage

Low-car 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.

In its original application, 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 27 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 original Planning Statement that 140 places were originally planned for, and that the number has been reduced to 32 (5 Co-car spaces included) 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 on how to continue with their work pattern.

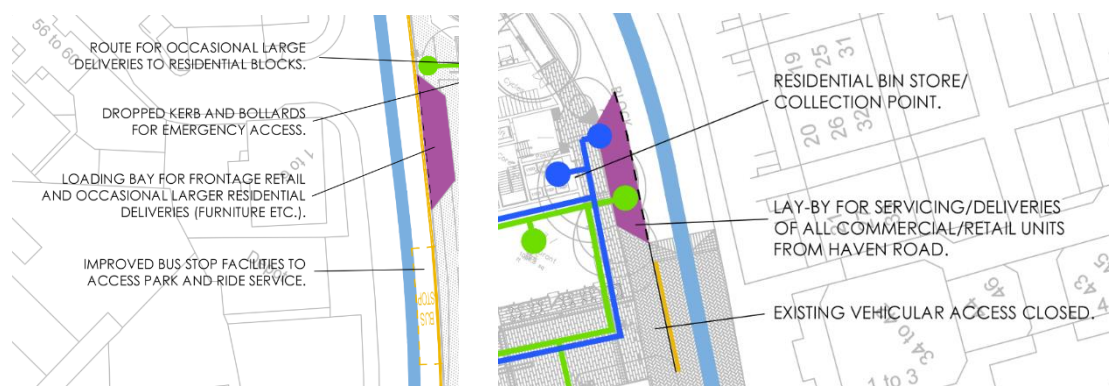
The developer is proposing just 2 disabled parking spaces on the basis that typically 5% of parking spaces are allocated for disabled drivers in car parks. But this argument is flawed, the 5% should be a percentage of users, visitors or residents. So for this development of 436 homes 5% represents 21 spaces. Will the developer be restricting the number of residents with a disability to two? And

how will any disabled resident of the co-living accommodation access the parking spaces

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. The fifth space seems to be a disabled parking bay.

We respect the applicant's right to develop this site which will result in the loss of the 205 car parking spaces that supported the retail units that will be replaced. This is not without consequences, as the car park has become a convenient and cheap car park for those visiting the canal basin area, or to use the adjacent climbing centre and water sports facilities. It must be recognised that those who have used the car park will now use the Michael Browning Way car parks, resulting in typical an additional 40 vehicles an hour using the car park travelling along Haven Road, passing the climbing centre, businesses and homes on the way. Due to on-street-car-parking on Haven Road the additional traffic will add an element of congestion 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 is 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.



The applicant states that there will be a new cycle hub provided on the site ('Revised Transport Assessment, p. 38), but we cannot see these 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 'Revised Transport Assessment' lists 12 Sheffield cycle stands for 24 bikes and locates them with accessibility from the main pedestrian courtyard in the development (p.38); we cannot find them in the drawings and maps.

In the revised application the developer explains as achievement the relocation of bicycle stores to the front of Building C. But the total amount of storage spaces has not been reviewed or increased. They say provision is in-line with the city council's cycle parking standards (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 – a total of close to 600. 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 again

There is in total 451 cycle spaces; the 'Revised Transport Assessment' proposes 485 spaces (p.38), and it is not clear where the additional spaces would be as the 'Revised Floor Plans' list 451. In addition, the 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 welcome the revised 'Framework Travel Plan' (February 2023). This plan is less car-centred than the previous version, for example with its considerations about the walking and cycling catchment areas. The new plan concludes that the 'review demonstrates that the site is highly accessible by sustainable modes of transport to a wide range of amenities within the city centre including extensive shopping and leisure attractions, as well as other general service, that have the potential to reduce reliance upon the private car' (p.11). The plan states that it will be financially secured by an s106 agreement/planning condition, and that a Travel Plan Coordinator will oversee its management, including implementation, review, promotion (p.21). The plan however does not demonstrate any knowledge of the walking/cycling infrastructure shortcomings away from the site (pp.7-9), which we will comment upon in the final section of our reply. This is a serious shortcoming and could have been addressed by taking our 'Prospectus for the Redevelopment of the Wider Water Lane Area' (published in Oct 2022) into consideration. The developer was presented with this document, and ECS and the Haven Banks Neighbourhood groups even had a meeting with the developer about these issues in December 2022.

Energy, Environment, Waste

In relation to of the 'Energy and Sustainability Statement' we welcome the choice of passive design (not further explained what the developer means by this in file 11 of the 'Revised Design and Access Statement, p.6), of air source heat pumps for the warm water production on site, and of photovoltaic modules on roofs to support the generation of electricity as the basic features on the site (alongside energy efficient measures). It would be good, however, 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 be taken 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 looks only a very short distance away from being introduced into the main market.

Contamination of the soil beneath the entire site is probable, because 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 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. Current developments move towards de-centralised water management solutions and the Haven Banks development has certainly the size to take some of them into consideration, especially as the down-stream major Sewage Works appears to be operating over capacity. There is not much said about rain-water storage on site apart from the mention of 'rain gardens' and 'permeable paving', 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. We are not convinced that waste bins for block A will not be placed on public pavements on collection day, blocking the safe passage of pedestrians, wheelchair users, and those with pushchairs.

Infrastructure outside the site

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 application should be expected to make a contribution towards the proposed replacement for Mallinsons Bridge to mitigate the expected increase in 'traffic' on this route through its CIL contribution.

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 application should be expected to make a contribution towards widening these bridges to mitigate the expected increase in 'traffic' on this route through its CIL contribution.

We recognise that the raised highway between the development and Piazza Terricina is intended to benefit pedestrians, but we believe additional work is needed to ensure safe crossing points for pedestrians from the point adjacent to block A, and the footpath adjacent to The Coolings. With the closure of the retail park car park there will be an increase in traffic on Haven Road, as well as the existing commercial vehicles accessing the City Industrial Estate and the Canal Basin.

Yours sincerely



Keith Lewis
Chairman



Gert Vonhoff
Chair Strategic Planning and Highways Group