

# Exeter Civic Society



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Registered Charity No: 286932

Richard Clarke  
Water Lane DMC  
Exeter

*By email*  
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12 April 2023

Ref.: April 2023 consultation for Water Lane Development

Dear Richard,

Many thanks for giving the society and people an opportunity to consider the latest proposals for the redevelopment of this area. And we are grateful for the two discussions we have had with the Water Lane DMC development team. At each stage we can see that you are trying to respond to feedback and to develop a scheme that is innovative and of mixed use.

You will probably be aware of recently reported discontent in the Alphington area of Exeter to a recent planning approval (albeit it small) where the developer significantly increased the number of homes proposed, and ignored a masterplan developed between the Alphington Forum, Exeter City Council and DCC. This sort of deviation from community led planning is clearly disappointing for that community and leads to distrust of both developers and planners. It is important that in taking forward these proposals towards a planning application, that any changes to what has been consulted on reflects public concerns, and there are no new proposals which the public may find difficult to support.

We understand your rationale for submitting an outline planning proposal at this stage, with investors taking in some of the buildings in the area marked in purple. You state that you are 'seeking approval for the mix and amount of development, and a set of parameters to control subsequent detailed design at the "reserved matters" planning application stage'. In the discussions we have had with you, you stated that this would include the height of buildings, their uses and green infrastructure, as necessary control elements for the detailed applications. We would like to see this more clearly set out in the outline planning proposal compared to the consultation boards.

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We would like to respond to your consultation panels in the order as listed on your website for this consultation.

### **Welcome Board.**

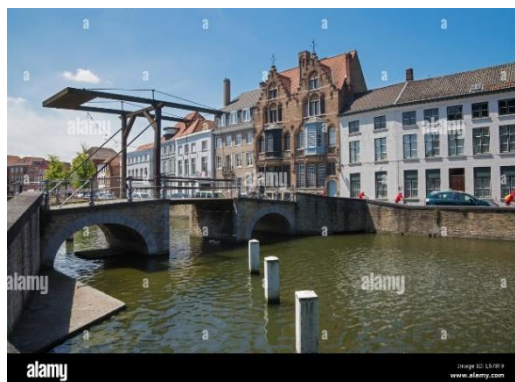
We support a number of issues identified on the plan of the development area. However, we are disappointed that you only have control of the land shown in Purple on the plans, and consider that the plan can inevitably only be speculative for the land owned by Transco, ECC and Vulcan Works.

The flood risk for ground floors results in alternative use here which is a positive proposal and should result in active frontages at the Water Lane level. Reducing the level of the pedestrian rail line underpass is welcome, but measures must be put in place to ensure surface water will be cleared if the new ground level is lower than adjoining surfaces.

The provision of mobility hubs, a bus connection and an energy management centre are all supported.

We also support the proposed vehicular route alongside the rail line on higher ground as a positive means of providing access and aiming to reduce the number of cars on Water Lane. Having visited the Tan Lane tunnels recently, we were surprised at how narrow the existing tunnels are. We hope that space can be found for pedestrian and cycle access to/from the Marsh Barton area under the railway by using both tunnels.

Two possible crossings are shown over the canal to the east. We understand from you that Exeter City Council is taking the lead on a bridge located at Gabriel's Wharf, but we must ask that the draught under the bridge is high enough for small boats and paddle boarders to pass under without a need to open the bridge (approx. 2m headroom), as proposed by the Friends of Exeter Ship Canal. This will clearly result in a need for ramps both sides. Whether the suggested swing bridge can allow for this, remains to be seen. ECS wonders whether a drawbridge design would be more suitable here, like the ones to be seen in the low countries – this at the same time would be a supreme focal point. Ramps on either side of the bridge could improve the height when closed, with the middle section only to be opened for larger crafts, and with no space lost on the embankments of the canal.



We support the widening of the tow path alongside the residential properties at Gabriel's Wharf and River Meadows – is this proposed to be done by developers as a contribution or by ECC through S106 or CIL contributions?

Proposals for biodiversity alongside the canal and Water Lane must be sensitive to the historical canal in a location that is rural. The towpath should be kept as simple as possible with any new trees and planting set back.

### **Project Background.**

The opening statement here says Exeter is increasingly seen as a prosperous and thriving city. But evidence shows that there is a high disparity between incomes and house prices in the city, suggesting a lack of wealth for young people and first-time buyers, and compounded by the recent increase in interest rates and rents.

We welcome the expectation that a bus service will operate from the area, and your statement that safe and accessible walking and cycling routes are needed to support a low car community. However, whilst there are some good routes, several need widening, especially over the river and flood channel, if a significant increase in users is expected. We appreciate that this may be funded through CIL funding.

We support the suggestion that new education, healthcare and leisure facilities will be provided, and whilst a school site is shown, there is nothing in this consultation showing new health or leisure facilities. Can this be added prior to a planning application being submitted?

In the planning policy section it asks that new development contributes positively to an area's character and identity. Whilst the existing homes in the area are not architecturally inspiring, we hope that the modern buildings proposed will widely use the current pallet of materials when detailed proposals come forward. The blocks on the former SecAnim site are positioned in a semi-rural setting so must have fenestrations and heights that respect this.

Elsewhere in the consultation there is mention of a landmark building. We hope this will result in a high-quality design rather than high rise. Mention of a 10-12 storey building in this ribbon development alongside the canal would not be suitable for this semi-rural location, especially when viewed from the valley park.

### **Placemaking Principles.**

We recognise that these brownfield sites are challenging to develop, but are disappointed that you have cited land costs, flood risks, utilities and contamination as

challenges towards making development financially viable. All of these issues should have been considered at the stage of purchasing the sites to suppress site values. It will be disappointing if in the future this is used to reduce any CIL or affordable housing contributions.

In respect of affordability, and considering our earlier point about housing affordability, we do hope that this area will result in mixed residences, including those on lower incomes. The proposal for 20% car ownership is supported, but if the development is to include those on lower incomes, such as care workers or nurses, and those who require a vehicle for work, we hope parking spaces will be allocated for those needing work cars and vans. In this respect, we hope that parking spaces will be managed rather than sold to the wealthiest, to ensure those in need of a vehicle will be prioritised. Will such consideration be included in any transport plan submitted with the outline planning application?

We ask, as set out in our Water Lane Prospectus, that the existing community is considered when planning new homes. Presently we cannot see that they will not have access to any of the facilities and infrastructure that is proposed, and we hope this approach will be sustained. In talks with you, it was confirmed that access for instance to an indoor swimming pool, boat storage at ground-level and co-working spaces would be open to the public. It is important that this is stated in the written material/planning application as well.

There is talk of transforming the character of the area from the quay to open meadows of the riverside valley park. Like you, we recognise the distinct character of the area, and hope that the canalside and river valley meadows will be respected and enhanced.

We support the principle traffic route proposed for your site area, but expect further discussions will be needed for transport routes through the rest of the Haven Banks area. We hope that Haven Road alongside the canal basin will be developed as a pedestrian priority street to support local people, tourism and watersports. To achieve this, a new road access to the City Industrial Estate would need to be established from Water Lane to divert the majority of traffic from Haven Road.

### **Mobility & Energy.**

We support the suggested car and cycle club initiatives, but wonder if the proposed number of cars is adequate for up to 1,000 homes - 2,000 people? Will there be land available to expand this provision, whether for more cars or bikes?

Your proposals for energy generation, storage and distribution are excellent and we hope you can deliver this.

Discussing further advancements towards the development becoming as energy self-sufficient as possible, you said that WLDMC is monitoring the market introduction of solar photovoltaic glass for adding this to the building integrated photovoltaic solutions. There are also interesting developments for integration of photovoltaics for upper-level cladding as integral part of the building envelope. ECS thinks all these opportunities to increase the on-site generation of electricity for your site-wide smart grid need to be taken into account, as with market introduction of the new products the prices will supposedly come down to a level where these products become a feasible investment in the high price energy market.

The water management for the site does not include considerations of grey-and black water recycling on site. Current developments move towards de-centralised water management solutions (see, for example, City Water Circles Research: <https://programme2014-20.interreg-central.eu/Content.Node/CWC.html> ; or on Decentralised greywater systems: <https://www.sciencedirect.com/science/article/pii/S0160412019318707>). The development has certainly the size to take some of them into consideration, especially as the down-stream major Sewage Works are struggling already. You already have plans for blue roofs and rain water usage on site for planting. Surplus rain water could be fed into a grey water system which then can use the water for flushing toilets, etc. As for black water recycling, the ground floor space in the buildings would allow the installation of a sewage treatment unit on site. Modern technology can achieve an almost 100% independency from central water treatment works. Given that water will become a much rarer and more expensive commodity in future, the layout of the development as most advanced in environmental technology would ask for this aspect to be included in the planning.

### **Landscape Design.**

With very few trees and greenery on this site, your proposals will clearly lead to an increase in biodiversity which is welcome. Greening Water Lane is welcome, and whilst we support pedestrian and cycle priority, smaller vehicles must be allowed to use this route, whether as a shared space, or controlled space, to ensure a good distribution of vehicle movements through the area.

Some of the few trees in the area are the tall trees alongside the SecAnim site. We hope these can be maintained to provide a mature contribution to the area, although

we recognise they may provide some challenges. They will contribute towards shielding the proposed residential blocks from the river valley park.

Landscaping alongside the towpath may be able to contribute towards the canal's history and former use. We hope that organisations such as the Civic Society and others can work with yourselves and ECC to design an improved and attractive route between the developed area and Clapperbrook Lane.

Yours faithfully

*K Lewis*

Keith Lewis  
Chairman

*Gert Vonhoff*

Gert Vonhoff  
Chair Strategic Planning and Highways Group