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Ref.:ECS Response to Draft Liveable Water Lane Development Framework and Design Code

Dear Howard Smith and Planning Policy Team

Please find here our response to Public Consultation Draft from October 2023.

DRAFT Liveable Water Lane Supplementary Planning Document. Development Framework and Design Code

Exeter Civic Society (ECS) is pleased that the city council has prepared this document, and that the public have been given the opportunity to comment upon it, particularly those who live locally.

General Points

1) Design Code / Development Framework / Masterplan

Whilst there is much to be happy about with this document, there are elements where we believe further work and amendments are needed, but we also believe there is an opportunity here to turn the short Development Framework into a master plan. The provision of a master plan is set out in the current local plan, and that plan is likely to be in place for a few more years until the Exeter Plan is adopted. There are elements of the design code that are prescriptive so would be much better included in a master plan because they set an outline of how the area will be shaped and connected to the wider area. Paragraph 42 of the Model Design Code states:

If a design code is being prepared for larger sites, it may be necessary to produce a master plan as part of the design coding exercise. This master plan will establish a new street network, decide which area types apply, along with various other parameters.

This reinforces the need for Chapter 3 - Development Framework, to be expanded significantly to be the overriding driver for future development as a master plan. Each of the design code sections has a good plan setting out ideas which are prescriptive and would sit better in this section rather than in the coding, which is more about the detail and nuances. In this respect we consider that Chapter 4 – Design Code, includes too many overarching criteria, plans and statements that do not reflect what the National Model Design Code guidance suggests. Paragraph 45 of the Code says about a master plan:

Figure 11 shows a notional master plan for one of the development sites identified on the coding plan in step 2b. The level of detail will vary depending on whether the authority or developer is preparing the master plan and the complexity of the site. It will also depend on where the site is in the planning process – local plan preparation, pre-application, community consultation, outline or detailed application stages. Landscape can be a major driver in a

design process at master planning scale. The exercise may include an illustrative master plan that shows what the area could be like in the future for the purposes of consultation, but the detailed plan would be illustrative.

Figure 11 states: The aim of the master plan is to provide a framework for the application of the design code to the site. This is likely to include:

- The landscape strategy, taking account of existing natural features of the site and wider area, biodiversity and new structural elements.*
- Green infrastructure including the amount and position of open space provision.*
- The number, type and tenure of homes and other uses (from the local plan allocation).*
- The points of access and connection to the wider street network.*
- The broad position of the primary and secondary streets but not local streets.*
- The position of the local centre if relevant. The area types that will apply to different parts of the site (which will in turn reference rules on density, height, street building line etc.)*
- Sustainability measures and supportive design in respect of master planning.*

We believe the above clearly shows that a master plan must set out much of what an area is expected to deliver rather than for this to be in the Design Code.

Whilst we recognise that the Chapter 4 (Design Code) relates to the red line area for new development, we believe that Chapters 1 – 3 must take account of the wider area and the existing buildings adjacent to the development area to give the context that guidance suggests, and as we have done so in our Wider Water Lane Prospectus, developed with the local community. The area to Alphington Road and up to Exe bridges must also be acknowledged as being part of the existing community, as well as the newer residential blocks alongside the river and canal to identify the character of the area – red brick and pitched roofs. Many existing residents will wish to use new facilities, possibly work in the new area, and be consulted on future development. As the highlighted wording below states, this document should meet the priorities of the local community, not that of developers and local authorities. Paragraph 35 of the National Design Guide states:

*The National Design Guide provides a structure that can be used for the content of local design policies, guides and codes, and addresses issues that are important for design codes where these are applied to large scale development on single or multiple sites. The ten characteristics reflect the Government's priorities and provide a common overarching framework. More specific guidance in the form of design policies, guides and codes can then be locally formulated **to meet the priorities of local communities**. All local design policies, design guides and codes will need to set out a baseline understanding of the local context and an analysis of local character and identity. This may include (but not be limited to) the contribution made by the following:*

- the relationship between the natural environment and built development;*
- the typical patterns of built form that contribute positively to local character;*
- the street pattern, their proportions and landscape features;*
- the proportions of buildings framing spaces and streets;*
- the local vernacular, other architecture and architectural features that contribute to local character.*

We have highlighted above in red what the SPD does not do, with the first paragraph on page 4 of the SPD being the only description of the development area, which is far too little because it only includes what is within the red line area and not the neighbouring community. To help capture the essence of the area as a baseline, examples of existing homes and buildings of interest should be included in a revised Framework chapter. All of the retained buildings of interest (not many) in the wider area should be mentioned with a photograph and description. The majority of buildings that are within the red line area are utilitarian of the 20th century and of no interest, but there is no mention of this.

2) Understanding of the Characteristics of the Area

Though 1.1 'Overview' and 2.1 'Water Lane – the opportunity' present an adequate description of the red line area and setting of the redevelopment project (pp.4, 14), 2.3 'Water Lane Vision' looking back on what may be achieved describes Water Lane as 'a dense and urban neighbourhood' (p.19) or 'urban neighbourhood' with a 'high density of buildings' (p.63). We would like to see more recognition of the different character of different parts of the development area: the term 'urban' seems to be more suitable for the north western parts, whereas the southeast end clearly marks a boundary with the Riverside Valley Park and its semi-rural character. The reason why this is important can be seen in L03 'Building heights' where the building heights coding plan envisages the tallest buildings in the south eastern tip of the development (6 up to 9 storeys in the 'southern zone', p. 68). Though we acknowledge the effort to divide the area 'into five built form zones which respond to the site context' (pp.64, 69-71), this cityscape/landscape change has not been made fundamental in the argument for the suggested density and heights. Especially for what later is called 'Southern Zone' we object to the suggestions of height and density.

3) Achievability and Compliance with the SPD

The document needs SMART objectives which are specific, measurable, achievable, realistic, and timely. There is a lot of woolly aspirational wording, which would make it very easy for developers to say they have met the objectives. Heights, distances, materials, use etc need to be specified clearly so that the developers' proposals can be tested against specific requirements.

4) Clarity about Status of Texts

The document needs to be clear what is policy and what is explanation that is not binding. The current document is not at all clear. Is it only the coloured panels that have to be followed? In its current state, the coloured panels are often very generic and not specific enough. The specific information is mostly in the text in the white areas, so if these are removed then the detail that is needed will be excluded. It was confirmed to us that the SPD would be the whole document. If this proves not to be the case, then it is essential that the detail in the text in the white areas is retained in the SPD.

Chapter 1 Introduction. This all seems reasonable, but we believe that Chapter 5 - Delivering the Water Lane Vision, should be brought forward to inform the reader because it is a very useful and informative chapter, even though it runs to just 2 pages. In the Commonplace version of the document chapter 5 is part of the Introduction section.

There are several elements of guidance that are quoted on pages 5 and 6, including the NPPF which encourages Design Codes, but the two fundamental government documents are the **National Design Guide** <https://www.gov.uk/government/publications/national-design-guide> , and the **National Model Design Code** <https://www.gov.uk/government/publications/national-model-design-code> which is in two parts, the coding process and guidance notes. The Design Code is subservient to the **Design Guide**, but the Design Guide gets very little mention, this should be corrected.

Chapter 2 – Vision. This is OK, but maybe the Vision statements in each of the design codes should be repeated here, or moved here as part of an expanded Framework Chapter? Aspiring for all of the things to happen makes a difference to the presented contents. It can mask some of the issues one might have with details of what is proposed within the code. *“Industrial heritage and the working Canal are celebrated and support new cultural uses.”* What is wrong with the existing uses?

Chapter 5 – Delivering the Water Lane Vision. We are pleased to read that an Infrastructure Development Plan will be developed as this is a crucial aspect of allocating costs across all development sites to share it out equitably between land owners.

We are concerned about the Stewardship paragraph as it talks about streets being managed in alternative ways to the usual adopted public highway, which keeps main streets in the public domain. Bedford Street in the city centre is an example of a street that is still a public highway, but managed by the Princesshay management team – but DCC has not lost complete control. We would like to see all streets adopted by the local Highway Authority.

The Community Engagement paragraph is promising but what does the sentence ‘I will continue to be.....’ mean, and does it need to be re-written?

We have many concerns about the Viability paragraphs. It is often claimed by a developer that a site is unviable or too expensive to develop then requirements can be reduced. It is our assertion that when acquiring a site a developer must work back from what is required or expected by a design code or master plan, and then negotiate down the cost or value of the site. With the benefit of this SPD and an IDP there will be no doubt what is expected.

Document needs SMART objectives specific, measurable, achievable, realistic, and timely to help readers understand the overall delivery of the redevelopment of the area. There is a lot of woolly aspirational wording, which will be too easy for developers to say they have met.

The Design Code needs to be clear what is policy and what is explanation that is not binding, but useful guidance, the current document is not at all clear. Is it only the coloured panels that have to be followed?

We wonder whether in the long term the solar farm site will be built on when it comes to the end of its serviceable life (25 years?). If this is the case the site should be included in the Master plan now, even if it is a long term objective.

Chapter 4 The Design Code. The sections are based on the council’s 7 themes of the Liveable Exeter Principles.

Many of the images in the Design Code section are taken from inner city sites elsewhere in the country and abroad. We wonder whether this is helpful as it does not really reflect the specifics of the Water Lane area. An example is the page on ‘Integrating historic and existing features’ (p. 33). There are also inconsistencies in presentation within the code. In some codes each paragraph is shown as a bullet point, and in others as just text.

4.1. Code contents. Not sure that this needs a separate reference number.

4.2 Regulating Plan. Essential plan but should be part of the Framework / master plan.

4.3 Memorable Places. (Exeter has strengthened its relationship with key features that define the overall image of the City including the River Exe, the City Centre, and the surrounding hills.)

Page 29, the vision statement. We would like to see mention of the quay moved to the end of the 2nd sentence; and should ‘canal’ feature, as well as Haven Banks and the River Exe Valley Park? As well as repairing boats should it include ‘launching’? Should Gabriel’s Wharf get a mention, or harbour be plural?

There is some basic contradiction in this description: on the one hand the text says ‘the water is more than a pretty backdrop’, but on the other hand it says that the ‘industrial and maritime past of the harbour and Canal Basin, as a trading hub, is celebrated through an enterprising community spirit’ (p.29). It would be worth considering established and new specialised businesses and light industries here to make the first aspect truly inclusive.

M01 Contextual Analysis. We think this should be written by ECC in the Framework section – there is no need for each applicant to repeat this, but acknowledge and show their understanding of it.

M02 Local Engagement. Engagement and positive benefits need to extend to the wider existing community as set out above. Add ‘established’ from text in white field text.

M03 Character and Cultural Identity. Whilst demonstrating an understanding of the maritime heritage of the area is essential, we don’t think there is much scope for the industrial heritage because the 20th century buildings and activities of the area are not significant. This could result in applicants grasping at straws.

M04 Relationship with the River and Canal. The headline statement ‘should improve the relationship with the *canal & river*’. 2nd bullet – put canal before river. In the preceding statement the link ‘for leisure’ should be added to the end. Parking must also be retained for visitors. Add a further bullet point: Keeping the Canal a healthy and sustainable environment, by avoiding overshadowing and allowing for sufficient natural space on the side of the Canal to preserve its close to nature (and not over-developed) character. The taller the building is the larger the distance of set-back that is required.

M05 Key Views. It is good that the code includes a Views Framework Plan on page 32, but we doubt the current outline planning application is compliant. This code mentions ‘creating new glimpse views’ but this is unlikely, and any new glimpses are only likely as a result of new buildings blocking existing substantial views.

M06 Historic and Existing Buildings. Nothing to disagree with here.

4.4 Outstanding Quality (Exeter has high-quality and net zero carbon living, working, learning, leisure, cultural and historic environments which help to attract top businesses and the best talent.)

We do not think that climate issues fit with this chapter, but are also not sure where else this would sit in the Liveable Exeter Principles. In the Design Code Guidance there is a section called Resources, environmental issues would be a better fit under such a heading. In the vision statement on page 34 we are not sure the first paragraph belongs but agree with the next three. In the final paragraph we would like to see Interest Groups added.

Images in this chapter of what has been achieved elsewhere can be useful, but each should include a link for readers to look at the wider context of other developments. Without this many images are pointless.

Q01 Global city qualities. We agree with most of this but do not think the final paragraph belongs here. We think most of the preceding text on page 35 does not relate to the code text and should be replaced. ‘*for leisure activity*’ should be added to the end of the second bullet point. And we wonder why the university is included in the fourth bullet point.

Q02 Zero Carbon. Whilst this code and the preceding text about resources are good ambitions, we do not consider they belong in the quality chapter. We think people will consider the quality of design and space a better fit. The example of Hammarby Sjöstad, like all examples in the code needs to have an active link so users of the code can see the example for themselves. Are there no good UK examples that can be included here?

Q03 Site Analysis and community engagement. Reasonable suggestions. we think the last item should refer to our prospectus and/or the ideas set out in Chapter 6, followed by community engagement. No need to re-invent the wheel!

Q04 Energy Hierarchy. We do not disagree with this and the following text, but is it in the right chapter?

Q05 Passive and climate responsive design. We wonder if the last bullet point should be the first.

Q06 Local clean energy networks. We understand that the Marsh Barton energy plant is mainly designed for electricity distribution rather than district heating. And to make a connection, DCC as

owners and its operators need to start installing heating or energy networks to enable connections to be made by future development.

Q07 SMART grid and infrastructure. All OK but should it be for the developers or another body to develop a digital platform (last bullet point) or should this be done by a statutory body or university of Exeter?

Q09 Air quality and pollution. OK. Surely the final bullet point is an ECC responsibility. The environmental health team should install the monitors to add to their existing network and to be able to monitor the whole city.

Q11 Materials and waste hierarchy. OK. Should there also be a requirement that if waste is to be collected by ECC that the provision of centralised bins is compliant with its guidance? (We have seen a few recent proposals where the number of storage bins is below the recommended level).

Q12 Embodied carbon. OK, but is the final bullet point legally binding, and if not, should it be rewritten? For the third bullet point there should be an active link to the stated assessment methods.

Q13 Resilience. OK

Q14 Building performance standards. OK. Is the third bullet point enforceable, if not, reword or remove.

Q15 Flood Risk. OK. In the preceding text it would be useful if the code provided more information relating to EA's flood level datum and measures for people to escape in the event of a flood. Whilst the new development areas will have residential accommodation above the flood risk level, existing homes in the area will be vulnerable to flooding despite the recent flood alleviation works. We think more work is needed to explore safe routes for the existing community

Q17 Development coordination. Agree with the first two bullet points but surely this document is about oversight of the second two bullet points, and it should suggest that the council will have oversight through the Framework element of this document.

In summary, as mentioned at the start of this section, there is very little about the quality of the residential area and living conditions provided in this chapter. Furthermore, much of this is high level that should be included in the Framework chapter as part of a master plan. In particular, codes Q15, Q16 and Q17 would be much better in the Framework chapter as these are strategic issues better led by the authorities.

4.5 Welcoming Neighbourhoods.

The Vision statement (p.51) is OK. It says that Water Lane has attracted people from all stages of life, including families. Many reports about low traffic use, which is a cornerstone of the new development, say that it is very different for families to cope without a car. May be what low-car use means for different segments of the population needs to be reflected better in the SPD.

W01 General land use and activity. Generally OK but in the first bullet point does providing space for the charitable sector mean charity shops or office accommodation? Provision of a Heritage centre needs more clarity. The third bullet point talks of co-ordination of plans and phasing, but this must be an ECC function, not left to the developers. This code should be moved to the Framework chapter as part of a master plan and not left for developers to lead on.

W02 Land use plan. Very good, with one exception: The Exe Water Sports Association site at 62 Haven Road is described as a residential led development site. This needs to change to "water related sports facilities", or in the coding of the plan 'water space'. And the plan should be in the Framework section. How has the council determined the mix of employment and residential use?

W03 Neighbourhood centre. All OK. The adjacent diagram is useful but we wonder if it is to scale – the space allocated on the land use plan looks much smaller. Should diagrams be numbered so they can be referred to? These diagrams need to specify distances; the set back from the waterfront, which should be about 40 metres.

W04 Primary school. Nothing much to disagree with here, but the site area must be included. DCC schools' team will know the ideal and minimum areas for a 420 place primary school, and Montgomery may be a reasonable example. Location at option B may be better because any development adjacent to the electricity base station will need to address the issue of noise. A school here could have its playing field adjacent to the base station. This will allow more housing in school location A closer to other residential, and bolster housing supply.

W05 Water related uses. The wording of the paragraph needs to be corrected to: Applicants must engage with users of the Canal and River and Exeter City Council, *and the Harbour Authority* at an early stage to understand their aspirations and requirements and define how the development proposals can best support these. This should include engagement with the Friends of the Exeter Ship Canal, the Exeter Canal and Quay Trust, *the River and Canal User Group, and Exe Water Sports Association.*

We welcome the suggestion that Gabriel's Wharf could be retained as a craning point. It should be made clearer how access will be made to the water. Codes are supposed to include sketch examples, and in this case, accessing new pontoons and the position of a slipway should be shown. Addressing the narrow footpath adjacent to River Meadows could be included here, to provide an improved walkway for the neighbourhood. The provision of public toilets needs to be added as an essential requirement.

W06 Housing mix. OK. The statement following should include a need for all apartments to have a balcony that will allow all occupants to sit out, and this should be in the council's residential guide SPD.

W07 Employment opportunities. OK, but providing an equitable area of employment space could be challenging. Perhaps the code should specify possible types of employment that would be suitable, or not suitable, even if this may cause anxiety for existing businesses.

W08 Existing uses. There are very few existing businesses to consider in the redevelopment of the area so it would be useful here if they were listed, e.g. City Industrial units, and Vulcan Works sites.

W09 Utilities. What does this mean? There will be no domestic gas boilers allowed in the future so we are only talking about electricity, water, Fibre, drainage. Clarity should be added here to the consolidation that is expected.

Water Spaces (pp.60-62). The document shows various water spaces which are represented by boats on the water. ECC is not clear what they mean by this. Once on the water boats move about. What the SPD needs to include are places where boats / people can gain access from the land to the water. The canal does not need three water access points for boats and people to the canal, but rather one really good one instead, where there is a large slipway, good road access to the slipway for a mobile crane, as well as vehicle and trailer parking, and no height restrictions for vehicles. Because of the nature of this type of traffic we suggest that the main water access point is located in a more industrial area and away from waterside cafes and pedestrian activity. The waterside café areas then could have small pontoons to enable visiting kayakers to moor and then use the local facilities. However there needs to be sufficient boat parking so that the mooring pontoon does not become blocked. The SPD and code must acknowledge the canal's Heritage Harbour status and the Route Map that has been developed by ECQT for the development and improvement of the canal. Without this will be conflicts between developers and ECC requirements.

W10 Gas Works Place. We hope a better name for this area will emerge from the community. Gas Works Place is not a good location for access as the canal is very narrow and so a pontoon cannot be located in the narrow part, but could be further into the basin. Each of the water places needs to show where the pontoon / slipway is to be located. Then on the land there should be a site for a car park where vehicles / trailers can be parked, and for boat storage, e.g. hoops for kayak storage. The references to Maritime Court need to be changed: Maritime Court is located further along Haven Road; the buildings near Gas Works Place are Compass Quay.

Otherwise the proposals in the code seem OK, but looking at the plans and diagram (needs a reference number) we think the proposals are trying to pack in too much. Relocating the harbour office to the former gasworks office is good to allow some development there, but we are not sure that adequate space has been allowed behind the gasworks office for more boat storage and the harbour

masters own needs. Would it be better to have boat storage where the harbour master's office is now to enhance the basin and canal boat activity? If development is pushed back from the canal edge it could be higher, including behind the former gasworks office? The Sea Cadets building is interesting enough without an iconic building, and the Welcome Inn and Exe View Cottages continue the heritage feel of the area.

W11 Gabriel's Wharf. Gabriel's Wharf is the best location for larger boats to be transferred to the canal via a new slipway because it has and will have good road access. This requires a strong enough embankment, vehicle and trailer parking, and no height restrictions for vehicles. The illustrative diagram sets out a reasonable arrangement for buildings being set back which is at odds with the WL DMC Outline Planning Application which wants an iconic building alongside the canal – this must now be rejected as part of that application. The arrangement shown, and described in the code should allow the wharf to be used for berthing larger boats and for lifting them in/out of the canal. Any pavilion should be set back closer to existing building, or not developed at all or a café should be located in the ground floor of proposed buildings. The Bristol Harbour photo shows good open space around the water's edge

Access to the water via pontoons should be provided above or below the wharf. Parking and road access are not clearly laid out to accommodate the intended uses.

The foot bridge over the canal in the picture on page 61 needs careful design. It should have water clearance of at least 2metres, so small boats can travel underneath. It also needs to be openable so large boats can travel along the canal.

W12 Clapperbrook Hub. At this location the entrance to the car park needs to have access for trailers, with a sufficient turning circle. Also important is that there are no height barriers for vehicles as many have roof-racks. The principles in the code are good, and a car park on the west side of the canal would be better, but its suggested position is at odds with other illustrations showing it on Grace Fields. Cars will continue to cross the bridge to access the Double Locks. Re-purposing or replacing the existing changing rooms is good – Bonham field will probably be needed to provide sports facilities for the emerging community in this area and at Marsh Barton. The code or IDP must be clear about how these facilities will be funded.

4.6 Liveable Buildings

Building density and building heights would be more suitably defined in a masterplan, and at the very least need to be moved into the Development Framework section of this SPD. As said in our general comments (point 2), we want to see neighbouring site characteristics, for example the proximity of part of the area to the semi-rural Riverside Valley Park, better acknowledged in maximum density and height definitions.

'Responsive density and height', p.63: Characterising Water Lane as an 'urban neighbourhood' is too simplistic (see comments under General Points, 2.). Delete the last part of the sentence ('with a strong chance of spotting a kingfisher flying by').

'Built form and scale', p.64: the concept section viewed from the Canal does not show at all of what it proposes to achieve – 'varied form and scale providing views and light between buildings'. There is little variation in roof shapes in the sketch, and in the middle section with existing housing in the foreground (between Cotfield Street and Gas Work Place) there seems to be no gaps in the buildings line.

'Building density', p.65, says that 'site testing has been used to set appropriate maximum plot ratios'. The reader is only presented with the outcome in the building density coding plan (p.68). We would like to see more about the site testing exercise and on what arguments the plot ration and residential density has been reached in an appendix to justify this.

L01 -Building density, p.66: To have 4 building density zones defined here whereas p.71 defines 'five distinct built form zones' which correlate to 6 different building heights in the heights coding plan, is all unnecessarily confusing. We suggest using the 'Built form zones plan' as a starting point and fuse all the other information into this one.

The residential density for the Canal basin zone is too high.

The density for the Southern zone should be well below the one of the central zone reflecting the close proximity to the Riverside Valley Park. The argument for 'taller heights within this zone' presented in the last sentence of p. 70 we do not find acceptable.

L03 Building heights, p. 68: Although the coding plan shows 'up to 4 storeys' for the Canal basin zone, an illustration on p.74 indicates 4.5 storeys, if you take the pitched roof into account. L03 needs to be precise by saying whether it takes roof shapes into account or not. See also our comments for L17.

The heights in the Southern zone are not acceptable (see our general point 2. and comments on L12).

'Built form zones': In the 'Central Zone' Water Lane, the street. Is correctly described as being of a varied street width with 'some street sections' being 'particularly narrow (p.70). Major redevelopment work alongside this street should seek for a more consistent width of this street in future. The sectional approach later under A14 does not seem to aim at that (pp.98-101).

L04, L06, L08, L11 and L12 should all clearly define the maximum heights, density and plot ratio for the different zones. To include the information from previous policies here would help to clarify the descriptions.

L05, Northern canal, frontage, p.72: it would help to define a minimum width of the canal path.

Northern Canal Zone, p.73, first sketch: Despite saying that the 'development is well setback from existing houses', the illustration suggests the opposite with its unbroken 4 storey block form which is overbearing the existing 2.5 storey terrace and even lower buildings next to it. As stated previously, we would prefer the sea cadets building retained, along with the Welcome Café, as well as boat parking on the canal office site to provide water-based activity with tall buildings set back.

L06/L07 Canal Basin Zone, p.74: the detailed information on page 69 about overshadowing and the relationship to existing built form and shape should be integrated in these policies.

What L07 says about 'buildings must be setback by a minimum of 3 m from the basin' does not seem to correlate with the sketch, where the corners of the new buildings seem to be closer to the basin. The definition of an acceptable approach, showing 'an articulated massing responding to the adjacent warehouses' is too vague. The existing Canal Basin Masterplan suggests that development here should be of varied design. We support this approach as it will reflect how buildings around the canal basin have developed since its construction. The slab like proposals are a step too far in gentrification.

L08 Central Zone, p.75: L08 speaks of 'continuous horizontal massing above 5 stories [typo: must be storeys] will generally not be acceptable'. The 'Building heights coding plan' (p. 68) has 'up to 6 storeys', with occasional exceptions up to 8. Harmonisation of the two pages is needed.

L12 Southern Zone, p.78): Bordering on the Riverside Valley Park and being closest to the canal, buildings of up to 6 storeys with taller buildings up to 9 storeys (p.68) and the highest density, with up to 220 dph and a plot ratio of up to 2.2 is not acceptable in this location. This plot marks the transition to the semi-rural environment and buildings should reflect this.

We think what is developed as '**Site wide codes**' (pp.80-83) overall makes good sense.

L14 Housing space standards, p.80: We wonder whether this should include the recommendation of ECC's Housing Design Guide, where 7.16 defines a minimum distance of 22m window to window spacing for habitable rooms. If not added here, we might want a different place to add this, as it has effects on plot ratio and densities and how achievable specific densities will be.

L17 Relationship with existing buildings, p.81: The statement 'Building heights should generally be no more than two storeys higher than existing neighbouring development' in relationship to the sketch presented needs to be more precise about whether pitched roofs are included or excluded (see also our comments for L03).

4.7 Active Streets

We fully agree with for Exeter the step-changing low car / healthy neighbourhood vision (p.84) and the Mobility Strategy as outlined in A01 (p.86), we also share the key objectives for the mobility network (p.85). The analysis provided for the movement and connectivity for the Water Lane area (p.85) rightly refers to the 'heavily congested' Alphington Road, and the fact that 'many of the[...] access points and connections are narrow and of varying quality, with the connections into the City Centre' being 'particularly constrained' is correctly acknowledged. But different from Exeter Civic Society's 'Prospectus', which we saw as a visionary stepping stone to a masterplan for this area and focussed on off-site connectivity to the rest of Exeter, the presently presented draft document avoids masterplan planning decisions like the basic street grid and its function for the Water Lane area, and rather puts them into a design code and then consequentially refers to off-site connectivity and improvements only in a very general and short section on p.114. Both off-site connectivity and basic street grid as masterplan functions should not be mixed with design code decisions. Both are prerequisites on which a design code then can be developed. We would like to see these parts (pp.84-95 and 112-114) moved into the Development Framework section and thereby make this more meaningful. Establishing such a hierarchy would help to clarify responsibilities for the delivery of an integrated traffic approach between ECC, DCC and developers, and such requirements must be included in the IDP.

There are four main problems which are not addressed appropriately in the street layout:

- 1) For vehicular traffic (even at a low-car owner rate for this area) we believe that at least two major intro/exit routes are needed for such an insular area of this development density. The traffic flow and vehicular arrangements also need to take into consideration the high visitor numbers, many of them with boats/canoes and other equipment, to this area., numbers which as a result of the development will only increase further. We suggested in our 'Prospectus' the Tan Lane underpasses as the second major transfer point to the wider area instead of using both tunnels only for active travel and bus access. For more details see our comments under A18.
- 2) Even at the present under-developed stage, commuter and sport cycle traffic in this area is in conflict with pedestrian and more leisurely cycle users. In order to cater for increased numbers of cyclists and pedestrians, we suggested in our 'Prospectus' to establish a fast cycle route separated from the existing cycle network. Changes to the suggested road layout of Foundry Lane and the discussed high line flood escape route using the old and disused railway line corridors within and outside the Water Lane area can support such a fast cycle corridor and improve the active streets connectivity to the rest of the city. For more details see our comments under p. 93, A17.
- 3) The (limited) vehicular road access from the site to Marsh Barton Station (for potential future bus use, and utility cars accessing the industrial sites there) needs to be looked at, as the available space narrows substantially alongside the solar farm. Is there enough space alongside a wide enough pedestrian route and the segregated slow cycle route? Surely the bus service from this area will pass through Marsh Barton via the station – unprofitable and unviable bus routes should not be promoted.
- 4) All roads on the site are to be fully adopted roads. By not being fully adopted roads can cause all sorts of difficulties, such as visitors not being permitted to enter, or allowed to park, and residents having to pay service charges to maintain the road.

A Low Car and Healthy Neighbourhood (p.84): Water Lane is not Exeter's 'first, purpose built, low-car neighbourhood', as this fame will go to the currently being built new development alongside Prince Charles Road.

A02 Mobility Strategy Plan: the plan is confusing, as it is almost impossible to see the distinction between primary streets and secondary streets in the street map. The use of different colours would be beneficial. Water Lane is indicated here as primary street to the very end near Marsh Barton Station, though later coding (A12-14) makes clear that this is only the main active travel route, not the main vehicle access route, which is Foundry Lane (A17). The mobility coding plan referred to in A01 is to be found under A11, not A03. It would help the comprehensive understanding, if the street plan

would not only refer to the potential bus routes, but also incorporate the existing bus routes (as shown in the map on p.89). This code and code A01 should be in the framework chapter.

A03 General Requirements: Because of the priority for active travel in the area, it is understandable that on lightly trafficked roads cyclists may be integrated into the general carriageway (p.88). Shared pedestrian and cycle paths, however, are not advisable for this catalyst development for future traffic solutions.

Public access for unadopted streets is an important principle (p.88), further explained later in the context of residents' stewardship models (A21, A22), but planning approvals must be worded correctly to prevent residents blocking off intended public routes.

A04 Public Transport: The lack of masterplan functionality is obvious where the indicative bus route within Water Lane is not discussed and presented with its linkage to the existing bus route, and the expected destinations of the route.

If Marsh Barton Station is seen as a potential 'multi-modal interchange', it would make sense to have a second primary mobility hub near the station (instead of the suggested secondary mobility hub).

A05 Mobility Hubs: The illustration should show cycle parking as part of the yellow part of the building.

A06 Primary Mobility Hub Functions: the multi-storey car park should not only consolidate parking for the new residential development in the northern Water Lane area and parking for the school, but also for visitors to the area. After launching crafts on the canal, cars and trailers will have to be parked somewhere and the ground and 1st floor of this multi-storey would provide suitable provision, with raised ceiling heights and enlarged parking bays on both levels. Should these visitors expect larger spaces for trailers, and be able to book spaces to enable certainty of parking?

A07 Secondary and Tertiary Mobility Hubs: Bike storage should be added to their function, especially for visitors to the area. Nowhere else in the document are tertiary mobility hubs mentioned, this may well be deleted here, as it looks as if this has spilled over from a previous version or a different plan.

A08 Car Parking: Different from A09 which mentions cycle parking for visitors, they are not dealt with in A08. The indicative average of 1:5 parking to dwelling ratio (20% cars) might be too low given the demise of Co-Cars. If the aim is to 'allow levels of parking to reduce over time' and parking areas need to be able to be re-purposed in the future, it would be more realistic to start with an average of 2:5 (40% cars), unless a car club can be provided from the outset of development. But we note that the current Water Lane Outline Planning Application is aiming for a 1:3 ratio (30%) for cars per dwelling.

A09 Cycle and Mobility Parking. Clarification needed – instead of one space per resident (as implied) this should be changed to one space per bed space.

Strategic Flood Access and Egress (p.93): this needs to be part of the masterplan function and for that reason it is not enough to just outline key design considerations, without proposing specific solutions. The potential future 'High Line' route with pedestrian cycle bridge across active railway provides a solution not only for the flood escape but also for a cycle/pedestrian route as part of the fast cycle route, connecting to Marsh Barton retail and commercial sites, and using the disused rail line corridor straight to the Sainsbury's superstore, rather than just a flood escape route when there is very occasional flooding.

A11 Mobility Coding Plan: We believe this should be moved to the Framework chapter as part of a master plan, and it would help the clarity of the map if different functions of the roads were systematically referred to. Neighbourhood Street should be shown as free from through traffic by using the broken lines used for Green Streets and Green Lanes. Similar broken lines should signal different functions of the different zones of Water Lane and Foundry Lane.

A12 Water Lane, Role and Function. In the third paragraph, access to Gabriel's Wharf should be included to show consistency with other descriptions about the Wharf. It would be helpful if any EA flood defence/risk document is provided as a link to the final paragraph.

A14 Water Lane, Access and Movement: The numbering of the different zones (p.98) should follow through from the northern to the southern end, making Zone 4 the new Zone 1, 1 new 2, 3 new 4 and segmenting Zone 2 into new Zones 3 and 5. It would help the clarity to locate the primary mobility hub in this map. The confusing section definitions (pp.99-101) should be deleted and the sketches aligned with the Zones (Section 1 would be new Zone 2, Section 2 new Zone 3, Section 4 new Zone 4, Section 5 new Zone 5). Within the cross section of Section 1 for new Zone 2, a segregated cycle path on both directions connecting the primary mobility hub to new Zone 1 of Water Lane with is segregated cycle lane would be more appropriate than a shared carriageway. New Zones 3-5 should introduce a speed limit of 5mph, to make a shared carriageway for cycles and vehicles safe and pleasant as active street. The 3.5m single lane shared carriageway in new Zone 5 is mainly for slow cycle use, future potential bus route to Marsh Barton Station and emergency vehicles, occasional servicing and utilities use (as described on p.96).

A15 -Neighbourhood Street:: The street name needs to be reconsidered.

A16 Haven Road/Maritime Court: The speed limit here should be 5mph, as vehicular traffic will be kept to a minimum. The illustration on p. 103 (showing space for trees and a 2m footway on the Basin side) is misleading, as most of the frontage will be between existing apartment blocks and the wall of the Canal Basin new development.

A17 Foundry Lane: There needs to be a distinction between at least two zones of Foundry Lane. The northern section up to Gabriel Wharf is the main vehicle access route described here on p.104. The southern section from Gabriel Wharf to the end of the redevelopment area is according to the map on p.87 a tertiary street, for emergency access and drop off and loading for residents (as it is envisaged in WLDMC's Outline Planning Application). We wonder if the whole of Foundry Lane can become the fast cycle route for commuters and sport users, with segregated two ways cycle path alongside the vehicular road. The widening of the road space alongside the railway line would situate the residential buildings further away from the rail-line and help with its noise impact on the homes here. In its southern zone this layout can provide the restricted car access as well, we think, clearly giving cyclists dominance over vehicles. At its southern end it would be advisable (if possible) to lead this high-speed cycle path through to Marsh Barton Station (alongside the solar energy station and the biogas plant). This would leave the canal path predominantly for leisurely cycling and pedestrians, thereby decreasing accident hazards and enhancing the leisure value of a quiet canal embankment. At the northern end the segregated two-way fast cycle route would end on Tan Lane with the section from there along the adjacent part of Water Lane (new Zone 1) being planned as a segregated cycleway connecting to Alphington Road via Haven Road (pp. 98. 107). In the western direction the cycleway would join the Tan Lane underpass or Tan Lane bridge over the railway (see comments on A.18).

A18 Tan Lane: To restrict the Tan Lane underpasses to active and public travel is missing the vital function both underpasses can have as the second major vehicular route into and out of this new development. The fast cycle route could be segregated from a pedestrian walkway lead onto a bridge over the railway line and then be connected to the disused rail corridor leading to Sainsbury's on the edge of Marsh Barton. This at the same would be the high ground flood escape corridor for the whole redevelopment area. Enhanced active travel and connectivity to Marsh Barton could provide enhanced vehicular traffic access through these tunnels to the Marsh Barton area.

A22 Green Lanes: Green Lanes must not be the sole or major access route for cycles. Otherwise cycles could go very fast here and the lanes would become rat runs. A general speed limit for pedestrianised zones would be suitable for both Green Lanes and Green Streets.

A23 Canal Crossing: Proposals for a new canal crossing must not only ensure the continued navigation function of the Canal, but also guarantee access to the canal (boat lifting, wharf functionality at Gabriel's Wharf). The bridge needs a headspace high enough to allow most boats/SUPs and paddle board users pass underneath without lifting/opening the bridge. The bridge must be wide enough for two cargo-bikes to pass, and have a segregated pedestrian lane. The bridge needs to be openable for larger vessels.

A24 Canal Tow Path: Our suggestion made under A17 for a separate fast cycle lane means alongside the canal only slow cycle use would be permitted. The widening of the tow path could still make sense to segregate slow cyclists from pedestrians on this stretch along the canal.

A25 Railway Crossings: This needs to be rewritten in face of our suggestion under A18. Both Tan Lane underpasses would become free for vehicular traffic use and the bridge over the railway to the high line flood route needs to be added here. We do not believe that the canal bank between Gabriel's Wharf and Clapperbrook Lane is wide enough for a bus route, and would be detrimental to the local environment. A bus route from the Water Lane area via Marsh Barton to Marsh Barton Station will provide this access.

A26 Off-site Connectivity and Improvements: an essential part of what would best be part of a masterplan in the Framework chapter because all of this is outside of the red line area for the coding. Applicants not only should collaborate with the local authorities to identify off-site contributions, but this must be made an obligation by the planning authorities. The key off-site links are described correctly, funding must be found and ECC/DCC collaboration on delivering these off-site links be established within the IDP.

Marker 10 for a new river crossing: is this a mistake or meant to be a more permanent replacement of the ferry service? This does not seem to be a good location for a new bridge.

Some notes on traffic flows outside the site:

- After Cricklepit Bridge: the alley next to Puerto Lounge is far too small. Replace Mallinsons Bridge. However even if Mallinsons Bridge is replaced it leads to the Fish Quay which has cobbles and is not a good through route for cycles. Serious need for another main ped / cycle route into the city centre, possible by making Quay Hill a car free route.
- The developments near Alphington etc could lead to a huge increase in cycling through the site as people make their way into the city centre. E-bikes make this a much easier option for cyclists. The SPD needs to address this. This wide area is quite flat and so there are likely to be lots of cycles; much more so than the Pennsylvania side of town which is so hilly as not to be cycling friendly.
- River / canal crossings need to permit a much larger traffic of pedestrians / cyclists, and be wide enough for 2 cargo bikes to pass. How old / strong enough is Trews Weir footbridge to withstand a huge increase in pedestrian traffic? Already when people run over it, the bridge shakes quite considerably.
- A traffic flows plan needs to be undertaken, taking into account the flows from outside the site, e.g. from the new developments in Teignbridge Council area. We have learned that this would be the responsibility of DCC, but there is no sign of the plan being undertaken.

Chapter 4.8 Spaces for People and Wildlife (Exeter's urban and natural spaces are attractive and well-connected environments well used for recreation, active travel and for supporting wildlife).

The vision is good, but we cannot see that within the development area there will be any 'community green spaces' for people to gather and socialise. This is borne out by the site wide infrastructure plan on page 116 which shows just one green space in the developed area. Grace Road field is a possibility, but not exactly local for adults or children. The playing field of the school cannot be relied upon because that will be privately controlled.

S01 Green Infrastructure Plan. This plan should be in the Framework part. OK, but not enough green space proposed within the built-up area other than streets lined with trees and planting. In European communities they build in green or social spaces and children's play areas.

S02 Open space. All good aspirations but the third from last para should be overseen by ECC identifying the palette of furniture and planting etc.

S03 Green and blue infrastructure. There is little to disagree with here but a link to the Green Circle route should be included in the third para. The suggestions in the final para are fine but ECC and the Devon Wildlife Trust should develop ideas highlighted in the Riverside and Ludwell Valley Parks Master plan and then cost these up for the IDP, rather than let developers take the lead.

S04 Biodiversity. All OK but ECC should provide the ecological baseline and opportunities rather than require each developer or planning applicant to do this again. They should then build on the baseline.

S07 Trees. The aspiration to increase tree cover by 5.5% is extremely low in an area devoid of trees other than alongside the canal. It seems a bit pointless having a % increase, perhaps a ratio of area would be better, or ratio to homes?

S09 Play. Fine words here but none of the plans indicate any play areas, or the requirement for a ratio of LAPs or LEAPs per number of homes. There should be a link to the council's Play Strategy guidance. There should also be a link to the council's playing field strategy.

S10 Food growing. Again a good aspiration but this can only be provided off-site, and probably within the valley park (where else?). If this is the case then ECC should identify land in the Exe Valley master plan.

S11 Residential open space. All OK, but balconies and private gardens mentioned in the last two paragraphs must meet any residential design standards established by ECC in the emerging Exeter Plan or a SPD.

S12 The community green space. OK. Maybe the pictures should include the spaces in the final bullet point?

S13 Canal. All Ok but should there be more said about the canal here as a recreational area or is that covered elsewhere?

S14 Railway embankment. Is it realistic to expect improved planting on the embankment? It seems to us that most embankments are left wild and Network Rail only undertakes essential maintenance.

S15 Grace Road Fields. Lots of good ideas here but should be developed with DWT, ECC, residents and interest groups to enhance the urban area and Exe Valley Park rather than left to developers. Ideas should be worked up to inform the IDP so that costs can be levied on new development to pay for changes. If a café is developed in the area, the fields could be a great children's play area with picnic tables etc. Some or all of the area could be developed as Belle Isle Park into a leafy space.

Chapter 4.9 Connected Culture (Exeter has a diverse and accessible cultural offering, connecting our world leading climate science, arts and literature, heritage, learning and innovation).

The Vision is very evocative but is it realistic?

C01 Culture led development. Is this too idealistic? It would be helpful if local arts groups develop a range of ideas that developers can tap into rather than rely on the developers to bring ideas that may not relate well enough to Exeter and its history. Reference artists and groups that can offer ideas.

C02 Public Realm placemaking. Great to work with local arts groups, but as above, they need to be identified and encouraged to develop ideas early on. We think it is very unlikely that there will be any space large enough to meet the aspiration of the second bullet point – should this be deleted?

C03 Creative industries. This seems very unlikely to materialise in commercially driven development, unless arts funding and ideas are identified before development comes forward.

C04 Meanwhile uses. There are probably many H&S issues that will get in the way of this happening, but we can live in hope.

C05 City culture hub. Nice idea, but this has to be driven by ECC and partners rather than developers, and this code should say so.

6.5 Engagement Summary

Citizens' Panel (p.148): The main point made by the Panel was that it supported the ECS / FESC Water Lane Prospectus. Many views were not articulated during the panel process because they were already in the Prospectus. This point needs to be made in the Panel's SPD. An example is

under 'Mobility': the method of separating the fast commuter cyclists from the slower travellers by having a "cycling motorway" along the edge of the railway line.

Comparison with the Riverside + Ludwell Valley Parks Master Plan 2016-2026

This Masterplan was the subject of a great deal of work and widespread consultation. It was adopted by Exeter City Council c 2016. This Masterplan contains several features that should be added to the Water Lane SPD including:

- The urban camping ground on Grace Road Fields, as shown on page 66. Urban campsites work very well in the locations where they exist, e.g. Oxford. It would provide cheaper holiday accommodation, and help Exeter to become a destination for activity holidays, e.g. for visits to the Quay Climbing Centre, hire cycles from the hub, hire boats to go on the canal, visit the city. Visitors to the campsite could come from all over the country and arrive by train. The campsite's toilets and changing rooms could be combined with the facilities for the visitor centre, equipment hire centre, etc. The campsite should be added to the SPD on W12 P62. We were previously advised that the campsite could not be located so close to the incinerator because there are regulations that prevent it. Some research shows there are no such regulations, it is just a planning matter. Given that ECC proposes to build thousands of houses on Marsh Barton it is clear that ECC does not consider that the incinerator prevents residential use nearby.
- Adjacent to the Camping Ground should be a new canal basin, which can be created using a bund. The site is chosen as it is low lying. The site is not suitable for residential development as it is prone to flooding. The new canal basin would provide a location for liveaboard people where pump out facilities, fire safety, water supply can be provided in a single location.

Word definitions

p.30 Legible and legibility These words relates to handwriting.

Spellings and word suggestions

p.33	it's	its	
p.34	it's	its	third paragraph
p.63	it's	its	line 2 of paragraph
p.118	accpetable	acceptable	
p.130	café's	cafés	
p.130	meanwhile uses	temporary uses	
p.134	l	It	
pp.149-154	citizen's	citizens'	

Yours faithfully

Keith Lewis

Chair Exeter Civic Society

Gert Vonhoff

Chair Strategic Planning & Highways