



Mr Howard Smith
City Development
Exeter City Council
Exeter.

By email
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1 July 2024

Dear Mr Howard

23/1007/OUT (Revised Plans).|

Demolition of existing buildings and structures and residential-led mixed use development providing new dwellings, residential and work space, retail, café/restaurant, community and cultural/leisure/education/hotel uses and associated infrastructure, including vehicular access, servicing, mobility hub, energy plant; alteration of ground levels; drainage and public open space; landscaping and public realm works; including pedestrian and cycle routes, with all matters reserved for future considerations, with the exception of access.

In the light of the addendum and revisions submitted by WLDMC in May 2024, the Society wishes to replace our response of 10 November 2023 with this response. Our main concerns about the scale of the development remain, and the bulk of this response remains the same, with new comments highlighted to assist the reader. Some of our previous concerns have been responded to positively and are now less of a concern.

1 General Context

1.1 The Civic Society welcomes this outline application for the development of this tired and dilapidated part of Exeter. We hope that future reserved matters applications will be sympathetic to this semi-rural location which requires redevelopment with buildings that are sensitive to the landscape of the area, respectful of existing residential communities, and respectful of the Exeter Ship Canal and its historical banks. First impressions suggest that this is not the case.

1.2 We do not wish to object to the overall development, but we do object to aspects that do not respect the concerns mentioned above. Through this response we will identify proposals we consider are controversial or inappropriate, and those that we believe will not enable the application to move smoothly through the planning process, and to support future Reserved Matters applications.

1.3 We are pleased that Water Lane DMC has acquired some land and buildings to enable this outline planning application. One significant problem with this application, however, is that it cannot align with a city council Master Plan for the wider area, even though a previous head of city development called for one in earlier years. Without a Master Plan for the area we do not see how neighbouring land owners can be compelled to agree with some of the aspirations that this applicant

proposes, particularly in respect of highways and transport links through the former gasworks site, and the giving up of land by the former gasworks owners and ECC for a new Primary school. It is our understanding from the applicant that the owner of the Vulcan works site is not interested in releasing their land for redevelopment. Without all land owners engaging in the redevelopment of this area with shared responsibility for the necessary infrastructure, the burden of cost will fall on this application, and others who are in discussions with the council's planning officers.

1.4 We are pleased that the City Council has now completed the master plan for the area SPD 'Development Framework and Design Code', and that some changes to these proposals, particularly relating to Gabriel's Wharf and the canal banks, have been incorporated into the revised proposals.

1.5 All of this leads to the following overriding objections by Exeter Civic Society:

1.5.1 The wider context of traffic flow in the whole area is not considered in the Outline Application (see points 2.2, 3.1 of our response for details), so we ask for more detailed planning of the traffic flow in the wider area to be conditioned if this application is approved. If this is completed in the next year it will enable DCC as the Highway Authority to determine whether this junction can cope with future demand and have in place proposals to mitigate that impact by re-designing the junction or looking at alternative routes for some traffic (such as some controlled traffic using the Tan Lane tunnel).

1.5.2 Ideally, as a supplementary planning document, the 'Development Framework and Design Code' should be consulted and agreed upon before developers' specific proposals are considered to ensure that planning applications are driven by the SPD rather than developed as piecemeal by each application. With disparities between this application and the 'Development Framework and Design Code', **we hope that any conflicts between the SPD and this application will be dealt with through conditions.**

2 Cover of Outline Planning Application

2.1 We appreciate the extensive research and analysis submitted as part of this outline planning application, together with the amended D&A Statement and Parameter Plans, which seemingly only wants to cover access.

2.2 The presented 'Planning, Design & Access Statement' (PD&AS), lacks coherence in what exactly it wants to cover: It states in its 'Executive Summary': 'The planning application is in outline, with all matters (layout, scale, appearance and landscaping), other than the mix and quantum of uses and the main access, reserved for subsequent approval' (p. 7). In its 'Introduction' it states: 'The detailed design of all matters, except for the main access, is reserved for subsequent approval' (p.10). And in its 'Planning Assessment & Conclusions' chapter it clarifies what access it wants to cover: '*The main means of access from Tan Lane plus the alterations to the arches under the railway line from Tan Lane to allow for improved bus and separate cycle/pedestrian access form part of the application. Details of the secondary access and other potential access points will be submitted for approval at a later stage as agreed with ECC and DCC*'(p. 150). We hope that the Design Code will bring some clarity to secondary access across the wider area, and become an SPD before any reserved matters applications are submitted for this site.

2.3 We are concerned that the outline application ‘includes parameter plans which are intended to provide the basis for planning conditions to help control and guide design at the reserved matters stage’. In the introduction the document already suggests the function of the parameter plans is to ‘be secured via a planning condition, as the basis for detailed design at the reserved matters stage’. These parameter plans, the ‘illustrative layout and illustrative perspective views’, due to their multiplicity and complexity of detail, bind them inextricably to the issues covered in this Outline Application. The document creates a mere illusion that, what it wants to keep as reserved matters for a later stage detailed application (or multiple of them, should plots be sold to other developers after the granting of the Outline Planning Application), will not be unavoidably linked to this outline stage. **The whole list of details of Chapter 9 (pp. 151-162) undermines this illusion.** We hope that, if ECC is minded to agree the parameter plans, appropriate amendments are based on public comments and the emerging SPD for the area. We note that the applicant uses terms such as ‘up to 7 storeys in height’ or ‘up to??sq.m. of residential space’, and whilst we accept that you may be minded to approve such statements, we hope that future applications will consider such limits as a maximum rather than a target to help address concerns that we and others have in regard to heights. **We request that ECC conditions and amends the submitted parameter plans and their implications in approving the Outline Application, and if that is not possible, consider rejecting the application.**

2.4 As a consequence of the complex applications and its implications, ECS’s response to this outline planning application will be structured in the following way:

2.4.1 ECS will comment on mix and quantum of uses and evaluate them as pre-determining factors of future detailed applications, especially in respect of people and transport connectivity.

2.4.2 ECS’s response will look into the parameter plans (PD&AS, chapter 7), the illustrative development proposals (PD&AS, chapter 6) and the details in the planning assessment (PD&AS, chapter 9), in order to comment on details where we object to the plans, or elements of the proposals.

3 Access, Mix and Quantum of Uses

3.1 Access

3.1.1 Vehicular Traffic Flow within the Area and Second Primary Access Point to the Wider Area

3.1.1a. This proposal suggests all vehicle access will be via a re-aligned Tan Lane junction, then along the proposed Foundry Lane parallel with the mainline railway to King Street (between F and G buildings) where it becomes the secondary vehicular road (open to existing residents and service vehicles). Access to Cotfield Street, Gabriel’s Wharf Estate and River Meadows will be via this road and the parallel one directional bus-only Garton Street (between G and H buildings). We hope the status of Water Lane between Cotfield Street and the junction with Tan Lane initially will be retained as a two-way highway to enable Gabriel’s Wharf to be serviced as a port by appropriate vehicles.

3.1.1b. The route for buses (electric) to and from the site from Marsh Barton is to be through the newly opened second Tan Lane underpass, a development we welcome as we suggested it in our ‘Prospectus for the Wider Water Lane Area’. The Outline Application states the existing underpass

will be used for pedestrians and cyclists. We attended a presentation by the developers' Richard Clarke on 16 May at which he advised that the higher of the two Tan Lane tunnels will be used to run white vans, site traffic and later residential traffic through it, and controlled by traffic lights. We see this as an important change to help with the traffic flow in the wider area once development is completed. The Amendments to the 'Illustrative Access & Movement' document (pp.28-29), however, 1.5.2 still only has this tunnel as 'Bus Only Route' outlined. **We would like to see that the document 'Proposed Tan Lane Concept Site Access' outlines for the 'access to the southern extent of Tan Lane' to include the use of the 2nd Tan Lane tunnel: 'limited to buses and authorised vehicles only [...] with enforcement cameras provided'.**

3.1.1c. We have significant concerns that whilst the 'Transport Assessment' (TA) speaks of 'two ultimate core vehicular access scenarios (TA 5.5.18-5.5.21) it does not truly look beyond the two regeneration zones and does not consider the potential bottleneck where Haven Road and Water Lane feed into Alphington Road. For safety and emergency reasons as well as for traffic flow, a second primary access point to the area using the Tan Lane underpasses should be considered in the long term to alleviate congestion at this junction, as part of a wider transport strategy for this area. That would provide a direct link to Marsh Barton. **As stated above, ECS wants to see both Tan Lane underpasses used as a second primary vehicular route in and out of the development.**

3.1.1d. We object to the submitted travel assessment, because it does not realistically demonstrate that existing roads and junctions outside the Regeneration Zone can cope with the additional traffic. We do not find it credible to conclude that 'the traffic impacts of the development proposal will not materially exceed the current permissions for the extant use' (TA 7.2.1). 900 to 980 homes, 275 cars, club cars and delivery vehicles, even with low-traffic specifications are likely to create more and not less trips. The TA does not explain satisfactorily how it comes to an overall negative net difference (TA 6.6.7). The 'Trip Generation Potential of Extant Site' as outlined in part 6.6 is based on data which we think does not match the current reality in this area: The TA states 'the justification for this is because the site still has the potential to operate at a level that it did over past years, when it was fully occupied' (TA 6.6.1). However, it fails to take into account that even the current under-usage of the area generates a number of trips which the roads outside of the redevelopment zones find hard to cater for. Furthermore, since the demise of the extant uses, many of the former industrial sites along Water Lane, Haven Road, and Tan Lane, has seen residential development which has generated additional vehicular movements. The lack of a **Travel** Master Plan for the area results in each developed zone being assessed individually rather than collectively for vehicle movements and the impact on the wider area. In the absence of other sites coming forward at this time, DCC must undertake an independent travel assessment for the whole area, including commercial and leisure traffic to provide a true impact on the Alphington Street junction, and whether it can cope with the traffic that will be generated once the whole area is developed.

3.1.1e. Part of the suggested low traffic environment is the provision of car club and bicycle club arrangements: these are mentioned in chapter 6.3 and under 7.1.13 of the TA. However, since the document was presented the current provider for both has gone bankrupt. **We recommend that if this application is approved, it is conditioned that any reserved matters applications must require that a new car and cycle club provider is identified before approval.**

3.1.1f. We are happy with the principle of the revised access arrangements to the development from Tan Lane, although we are unsure what the timescale is for this and how it will be implemented. Presumably the existing tunnel will exist as a bus only route until the majority of the development is complete, with the new tunnel and the new Foundry Way being used by construction traffic only. **The phasing of the access arrangements for construction traffic and then residents must be clearly conditioned in the approval.**

3.1.1g. We note that the applicant has responded to comments from Active Travel England and tried to address the concerns they raised. We accept that most of those responses seem to address ATE's concerns, but we have concerns about the outcomes indicated for travel to and from the site published in tables 1-6 seem flawed. For servicing of the site, table 3, the number of vehicles proposed seems low compared to other forms of access (presumably for workers). We have looked at tables 5 & 6 for travel distribution at peak times, and in considering train use (we appreciate the numbers are low), the published data seems inaccurate, and if this element is inaccurate, how can planning officers have faith in outcomes for other modes of travel. For example, there are no journeys shown to/from stations at Cranbrook, Pinhoe, Taunton, Topsham or Torquay, but there is suggested train use to Pennsylvania and Clyst St Mary where there are no stations. **The applicant should be asked to submit revised analysis.**

3.1.1h. The plans show only limited vehicular access to Water Square, east and south of Building E1, which poses a serious problem for access to the canal and the Gabriel's Wharf facilities (see next point).

3.1.2 Access to Gabriel's Wharf and Functionality of the Canal beyond Leisure Facility

3.1.2a. We are pleased to see 'Gabriel's Wharf is acknowledged as a craning point and vehicular access following comments from the Harbour Master earlier this year. And whilst the footprint and dimensions of Building E1 seems to be set further back from the canal's edge, there are no details of how large vehicles will be able to turn in that area, or for boats to be safely moved in or put of the canal. Will the proposed Water Square be a public space or simply a turning head for vehicles? We support the statement ' [...], with the potential for temporary vehicular access for dropping off boats and other water-based leisure uses' (p.28)., but more detail will be needed when a reserved matters application is submitted. The 'Design & Access Statement Addendum' highlights these and other changes to guarantee the access at Gabriel's Wharf and more space for maritime activities.

3.1.2b. Leisure canal users should now benefit more from these changes, but no retention of a 'shipyard' is included, as this is seen as 'not compatible with redevelopment proposals in terms of land-take, noise and visual impact' (p.7). We are disappointed with this assertion as this is a public quay, and at the Harbour Master's discretion, shipbuilding or repair may take place in this area as it does at the canal basin. **We would like to see a condition applied to any approval for the applicant to agree a plan of Port Operations with ECC as the Port Authority to ensure that land is prioritised for this, as well as access by boats, vehicles and cranes, and an ability to turn and operate safely. In addition, when such operations are taking place, that there is a safe alternative route through the area for pedestrians, cyclists and essential vehicles (to the electricity generation site and solar farm site).**

3.1.3 Wider Access to the River Valley Park and beyond (Cycling, Pedestrian, New Bridge).

3.1.3a. We have consistently highlighted to both the applicant and Exeter City Council the need for a draught under the proposed new bridge across the canal to allow the majority of crafts to pass under the bridge without being impeded by it, as is the case at Clapperbrook Bridge. We accept that the 'possible new swing bridge over the canal is omitted' (p.28) from the previous location at Gabriel's Wharf. The reason for this was explained in our meeting with WLDMC on 16 May, with WLDMC seeing this as a responsibility of ECC with potential alternative places further up and down the Canal. Our concerns about a suitable draught under the new bridge remain the same. **We hope that either a condition for funding the bridge (or contribution), or a S106 requirement will be included as part of any approval of this application.**

3.1.3b. We hope that in the meantime that DCC, ECC and the Harbour Master will work towards investigating the provision of a bridge to support access to the valley park for future residents. The bridge is also important to support active travel for new and existing residents in what will be a low car ownership area.

3.1.4 Layout of Cycle Routes.

ECS has reservations about the width and the layout of the pedestrian & cycle corridors as shown in Figure 7.4 (PD&AS, p. 139). Though 5.98 speaks of 'segregated cycle routes [...] alongside the main vehicular route and along a leisure route next to the canal edge', later it remains unclear whether this segregation is just from the vehicular traffic or between cyclists and pedestrian pavement as well (pp.126f). Figures 6.51 and 6.52 seem to indicate that cycles and pedestrians share the same space. **The applicant should demonstrate how this will be LTN1/20 compliant, and we recommend any approval of the application will mandate the improvement of cycle routes both through the site and beyond it to support active travel.**

3.1.5. The repositioning of Building A1 'to allow a potential connection to the south-east' (p.28) is welcome, as long as this supports the cycle priority route, but at this stage there are no details in the application of where this route will lead to. **We hope that future reserved matters applications will clarify this.**

We recommend that if this application is approved, it is conditioned that any reserved matters applications must require that a new car and cycle club provider is identified before approval.

3.2 Mix of Uses

3.2.1 We applaud the concept of the 'mixed use focus', especially where it is used 'for new building typologies including living accommodation over co-working space and other uses, and flood compatible uses at ground floor level' (PA&AS 5.42). This not only opens up innovative energy and carbon saving proposals and a strong self-identity of what effectively is a new residential quarter of Exeter, but also provides a multitude of space for communal use on the ground floor level for residents, neighbouring communities and visitors. The integration of Exeter College Constructions Centre (H1) and Renewable Energy Skills Centre (H2) is a strong indicator of what is possible.

3.2.2 The support the re-positioning of proposed block E1, and hope this will support access to Gabriel's Wharf as a working quay. This area must be allocated adequate land to enable the wharf to operate as it does now, and to ensure people's safety during these occasional operations. We

hope that ECC will prepare plans to demonstrate the minimum needs for this area to operate with safe turning space for vehicles needed to lift and transport boats from this quay.

3.2.3 We are not convinced of integrating a sizeable hotel (F1) into this area, as the location is quite a distance from the city centre and major employers, and as a consequence might increase car use. Will the river valley be the place to attract substantive numbers of overnight staying visitors? Should hotel use remain part of the mix, we wonder whether it would be more suitable and unique to produce a mix of hotel rooms and Air B&B style accommodation for this site, in order to reduce the pressure on existing properties in the area by the Air B&B market.

3.2.4 We now understand that the student blocks are located in blocks L1, K1 and M1 as they would become a viable basis for the bus route linking the new development to the city. However, want to maintain our suggestion to look into further improving the mixed use of the site, by including options where student living, independent retirement living, retirement home living, and BtR being located together in blocks as a truly innovative approach. All age groups should support the viability of the bus link in these car free blocks, a truly innovative approach not found elsewhere in Exeter.

3.3 Quantum of Uses

3.3.1 The application sets out repeatedly 900 to 980 homes and 36-40,000 sq.m. of other uses to be developed in the Southern Regeneration Zone (PD&AS 1.11), which translates into a gross density between 144 and 154 dph (9.16). The approach is described as creating 'a new, stronger urban structure' (9.13). It claims that proposed heights are 'appropriate to the surrounding townscape and well related to adjoining buildings, spaces and human scale (before 9.17) and explains that the 'Building Height Parameter Plan provides a mechanism for controlling height at the detailed design stage' (9.17). With the existing homes being 2-4 storeys in height with pitched roofs, and with most of the Southern Regeneration Zone approaching the River Valley Park, we want to object to any building heights above 5-6 storeys and want this to be made a planning condition (for more details see 4.1). ECS wants recognition that what the application consistently calls a new urban quarter, is, given its location in the semi-rural river and canal valley, not in line with the surrounding area – despite this alignment being one of the leading principles for the development (pp. 151-152). The examples provided of successful regeneration blocks elsewhere are of central areas in Bristol and London, and not appropriate for this area. Can the applicant provide examples of residential development in semi-rural areas? Although we are pleased that the proposed 12 storey building has been removed, the floor area had been distributed across other blocks which may be detrimental to the views of the blocks from outside the area. We hope that the Water Lane SPD will now guide and control development across the wider area.

3.3.2 We fully understand that because the application is aiming at a 'sustainable future urban living' and providing 'space for community activity' (5.21), it needs to 'optimise the potential of the site and to accommodate and sustain an appropriate amount and mix of development' (before 9.29). We agree with the applicant's statement: 'For delivery to happen the quantum of development and its alignment with market expectations needs to generate sufficient value to achieve viability' (5.53). But expecting this development to generate all of the financial return for the proposed infrastructure in its Southern Regeneration Zone creates the problem of heights not suitable for the surrounding landscape and we therefore object to this. The former Gasworks and Vulcan Works sites may be a better location for higher buildings because they will have less impact on existing homes and the river valley park, and these sites must contribute towards the necessary infrastructure costs that is

expected of this application. Such issues are the result of not developing a Master Plan before this application was submitted.

4 Objections to Details of Development Parameter Plans

4.1 Massing within the Plot (pp. 134f.)

4.1.1 We question the overall quantum of the different uses and floor areas where this leads to heights above 5-6 floors, above Water Lane as a datum.

4.1.2 We object to the suggested massing of the outlined buildings for two further reasons, because they make the suggested density undeliverable. Although this is only an outline application, it still needs to ensure the placing of blocks (privacy distance, noise mitigation) is achievable, otherwise ECC cannot determine whether the projected massing is possible, appropriate and deliverable.

4.1.2.1. First, Figure 5.22 (PD&AS, p. 69) shows the suggested layout of the buildings does not follow the habitable rooms spacing as recommended in ECC's Housing Design Guide under 7.16 (with a distance of 22m window to window spacing). The G blocks are only 14m apart from each other and 16m away from the existing Gabriel Wharf settlement. At the southern end Buildings A1 to D1 are only 18-19 meter apart, with wings of B1, C1 and C2 having 21m from window to window. We see no reason why ECC's Housing Design Guidance should not be followed as this is important for safeguarding the privacy of existing and future residents. **It is our expectation that the 22m distance between habitable rooms should be a condition of any approval**, as the applicant clearly will not submit revised plans that demonstrate that compliance with the 22m distance is achievable within the suggested density.

4.1.2.2. Second, in order to achieve the planned density, the Parameter Plan positions blocks in too close a proximity to the main railway line. This will create issues of noise for the residents of several blocks. We estimate that Building C1 is about 12m away from the rail line. Cross ventilation is suggested (p. 68, wavy blue arrows indicate cross ventilation) for these blocks but if this is the case windows will be openable and noise from trains a potential problem. We wonder whether ventilation systems and bedrooms facing away from the line should be an expectation, and we note that the council's environmental health officer also expressed such concerns. The applicant's consultant Stantec has provided a response to those concerns and states that noise issues will be addressed at reserved matters stage. **We recommend that this is conditioned for all buildings proposed for the site as few are very far from the railway line.**

4.1.2.3. We like the new shapes of blocks L1 & K1 as they remind us of round elements of former gas holders and industrial heritage, however, the entrance to Water Lane from Tan Lane has a tunnel like appearance and a better design is needed here.

4.2 Massing in Relation to Outside Areas

4.2.1. The visualisations in the revised Appendix B of the 'Landscape/Townscape & Visual Impact Assessment' indicate the new buildings with their massing and how these will have an unacceptable dominating impact on the adjacent environment.

4.2.2. We appreciate that some adjustments have been made with the removal of the 12 storey block, but with the floor area being distributed across other buildings some are now eight storeys rather than seven. The roof shape of blocks F1 & G1 helps to break lines, but this is not followed up in the blocks south of Water Square: A1-D1, which result in a blocking feature towards the canal with their 7 and 5 storeys. Would a stepped approach from the canal to the railway be a better massing?

4.4.3. The application states that views and vistas are an important part of the heritage significance of the site area (PD&AS 9.43). Views in closer proximity to the site reveal why tall buildings will not be appropriate in the southern parts of the redevelopment area. As the 'Landscape/Townscape & Visual Impact Assessment' does not look into the differentiation between the Southern and Northern Regeneration Zones (a distinction used in the 'Transport Assessment'), it misses out on distinctive differences 'in the local context' (PD&AS, p.30).

4.2.4. The visualisations from the canal (App B- pages 8-10) demonstrate that seven storey blocks in this semi-rural location are wholly inappropriate and intrusive to the River Exe Valley Park. The height of the blocks should at least step up from three storeys for block A1 to a more acceptable height for block D1. The view with the existing residential housing in front of the proposed blocks (App B-page 24) demonstrates how inappropriate the building heights are, blocking views towards Haldon Hill.

4.2.5. The view from the Marsh Barton Road direction is of a solid skyline of blocks which look intimidating (App B-page 12). Some blocks do not have gaps between them to allow distant views as set out in the emerging Design Code SPD. And it is clear from the distant views from the west that the uninterrupted blocks will be very prominent (albeit accentuated with the blocks being picked out in blue). **We hope that any reserved matters application will endeavour to ensure designs are adjusted to help the development blend into the environment better.**

4.3 Building Heights (pp. 136f.)

4.3.1. ECS approves the recommendation for a 'neighbourly scale' of the development, that is 'respectful to the existing residents around the edges of the application site' by offering 'a lower scale along these boundaries' (PD&AS 5.107). We do not think that proposals follow this suggestion: F1, G1 and H1 are outlined in the parameter plan as up to five storeys high (PD&AS, pp.136f.), with details presented in 'Illustrative Storey Heights' (pp. 88f) showing that the lower part of these buildings is not facing the existing buildings. We think an up to 4 storey height would be much more suitable for the existing housing being 2-4 storeys high. Whilst block F1 appears to be an appropriate height, block G1 with its gabled roof appears to be too high; maybe flats roofs would be better on the hotel. The visualisation App B- page 23 demonstrates clearly the overbearing height of the Block G1, and blocks A1 to D1 from the river/canal direction.

4.3.2. For the majority of the buildings the height increases to 7 or 8 storeys closer to the railway line. As the higher buildings sit alongside the canal and valley side of the area, we consider that these heights are out of character with the surrounding area (River Exe Valley Park): the southern end of the Southern Regeneration Zone is not a city scape (9.13), but a boundary towards a rural

landscape. The proposed visualisations App B-pages 25-28 clearly demonstrate the inappropriate scale of the proposed buildings.

4.3.3. We understand the argument that the proposed buildings can shield the noise of the railway, but for acoustic reasons that would need to be a continuous block (the current projections show 7 gaps between A and H1). The argument that they will also shield the view of the railway is not valid either. Residents and visitors have become accustomed to the view of trains for well over 100 years, and may prefer the lower level of the rail line to the proposed overbearing views of new buildings.

4.3.4. Our concerns set out above in respect of building heights highlight the negative aspect of height if the blocks are not broken up to give views in and out of the area, and to avoid a canyon effect. The canyon effect can be seen in the image into Water Lane from Tan Lane with blocks L & M having flat facades. We would like to see block M redesigned so that it is more sympathetic to the height and character of buildings on Water Lane to the north.

4.3.5. For all of these reasons ECS strongly objects to the currently proposed Building Heights Development Parameter Plan. **A maximum building height of not more than 5-6 storeys (with sensitivity towards already existing building's heights) must be made a planning condition.**

4.4 Other Aspects.

4.4.1 Trees on Site.

We also find it important to keep the existing row of hybrid black poplar trees (a protected species) on the canal side as a valuable means of screening the housing from the east of the valley/canal and from further afield. The retention of these trees is advised in the 'Arboricultural Statement and Tree Survey' (points 2.4 & 2.5). **The preservation of the 15 hybrid black poplar trees must be made a condition of any planning consent, as well as their root and branch protection.**

4.4.2 Definition of Public and Private Spaces.

4.4.3 We would like to see a clear definition of public/private spaces, and although 6.59 says that 'there will be a clear definition between public and private spaces', it remains vague by saying this would be achieved 'with a variety of treatments such as planting or fencing' (PD&AS, p. 114). It remains unclear how the private end of Foundry Lane will be shut off from the public. **These public/private space definitions should be clarified now, or conditioned at approval stage to avoid any ambiguity at reserved matters stage.**

4.4.4 We still have concerns about the management of the streets and spaces that will be developed as part of the proposals. It not clear whether the majority of the proposed roads will become adopted highways or remain as managed private streets. The applicant shows just two open/public spaces at the Tan Lane / Foundry Way junction, and at Water Square, but both are highways over which traffic will need to regularly pass, so not suitable for people to sit or relax.

4.4.5. 'Public routes between B1-C1 and C1 & C2 have been replaced with semi-private spaces for residents' (p.28). It will benefit the residents in these blocks to have private space. We understand that this will not create a 'Privately Owned Public Space' with all its intrinsic problems of private regulations. We hope there will be enough public access land between the canal and the new

development to supplement resident's amenity space, and we welcome the possibility of boat storage facilities under these blocks.

4.4.6. The applicant still indicates the provision of a mobility hub on Central Avenue, and they cite the avenue as being a pedestrian route, but surely any hire cars from the hub will also need access to the avenue. **We hope that this access and the status of new streets will be clarified at reserved matters stage, and before the development of any buildings commences.**

Conclusion.

We hope you and the applicant finds these additional comments helpful in determining the application and for the reserved matters applications in the future, having noted that there are very few additional responses to the revised proposals on the planning portal.

Following our meeting with the applicant on 16 May 2024, we understand that the intended timeline for considering the planning application is that on 16 July the Water Lane SPD to be decided upon by ECC's Executive (we note that no further consideration of the SPD by the public is taking place after the first consultation – we heavily criticised many of the suggestions in the Design Code), and that the Water Lane DMC Outline Planning Application will be decided at Planning Committee soon after.

The applicant has advised us that they hope to commence in Q4 2024 with enabling works design, and by the end of Q2 2025 / Q3, enabling works will start with the high pressure gas mains being relocated and lasting for 1 to 1.5 years.

It will be a positive outcome if proposals to develop this tired area of Exeter can be approved this year, **and we hope that any such approval will include a large number conditions to enable appropriate scale, and with S106 contributions towards essential infrastructure.**

Yours faithfully

K Lewis

Keith Lewis. Chairman