

Liveable Water Lane Supplementary Planning Document (SPD)

CONSULTATION STATEMENT

June 2024

Exeter City Council
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EX1 1JN



Introduction

- 1.1 The Liveable Water Lane Supplementary Planning Document (SPD) provides a vision, development framework and design code to support the delivery of high-quality, co-ordinated redevelopment and placemaking in the Water Lane area of the city.
- 1.2 This report provides details of the statutory public consultation undertaken by Exeter City Council (the Council) on the draft SPD. It also summarises the main issues raised in the consultation responses and explains how these have been addressed in the final version of the SPD.

Consultation

- 2.1 Statutory public consultation on the draft SPD ran from 23 October until 4 December 2023. This exceeded the statutorily required minimum period (four weeks) and met the six week period required by the Council's Consultation Charter.
- 2.2 The consultation ran alongside public consultations on the Full Draft Exeter Plan and Householder's Guide: Design of Extensions and Alterations SPD. The consultation complied with the Council's Statement of Community Involvement and Consultation Charter.
- 2.3 Responses to the consultation were invited online through Commonplace, the interactive online engagement platform that has been used by the Council for several other consultations. The option to email or post responses was also available, along with the availability of paper copies of the consultation questions (survey) on request, plus other versions and support as required.
- 2.4 The consultation was extensively promoted, including as follows:
 - Exeter City Council's weekly e-newsletter (available through 'Stay Connected'), which is sent to over 4,000 people across the city;
 - Public exhibitions held across the city, including at Haven Banks Outdoor Education Centre and the Customs House, close to Water Lane. The exhibitions ran during the afternoon and into the evening to promote access. They included the provision of exhibitions boards and leaflets summarising the draft SPD and consultation, paper copies of the draft SPD and consultation questions and the opportunity for people to ask questions and discuss the draft SPD with officers from the City Development team and LDA Design (who prepared the draft and final versions of the SPD on behalf of the Council). During one of the exhibitions, two officers from City Development met with representatives from the Haven Banks Residents Group and a St David's Ward Member to discuss the SPD. The events doubled-up as exhibitions for the Full Draft Exeter Plan and Householder's Guide SPD;
 - Email/post notification for all those included on the Council's planning policy database, including statutory consultees;
 - A Council online news article;
 - An article in the November 2023 edition of the Exeter Citizen which went to every address in Exeter;
 - Promotion of the Council's social media platforms; and
 - A fully accessible online consultation document, with other formats of the document made available on request. An audio version was made available online and in CD format.

The survey

- 3.1 Consultation questions (the survey) were structured to enable respondents to provide detailed comments on the vision, development framework and individual design codes in the SPD or to reply quickly if they had less time. The survey initially asked whether people were happy/satisfied/neutral/dissatisfied/unhappy with a particular element of the draft SPD, with a follow-up open question asking for more detail as to why they felt that way and to provide any other comments.
- 3.2 Respondents had flexibility to choose which questions they answered. It was also possible to answer the initial satisfied/dissatisfied question without providing further comment and vice versa.

Response overview

4.1 Eighty-six unique respondents responded to the consultation. Of these commenters, twenty-eight responded on behalf of an organisation; one was submitted by a Ward Member on behalf of approximately thirty-five local residents who attended a Community Conversation event arranged by the Exeter Green Party; and the balance of comments came from individuals.

4.2 The twenty-six organisations that responded to the consultation were:

- Devon and Cornwall Police
- Devon County Council
- Devon Wildlife Trust
- Diocese of Exeter
- East Devon District Council
- Environment Agency
- Exeter Civic Society
- Exeter Community Centre Trust
- Exeter Cycling Campaign
- Exeter Green Party
- Exeter Port Authority
- Exeter Water Sports Association
- First Plan on behalf of National Grid and Wales and West Utilities
- Friends of Exeter Ship Canal
- Guide Dogs
- Haven Banks Residents Group
- Historic England
- Homes England
- McMurdo Client Group
- Nash Partnership on behalf of Cillardara Group
- National Highways
- NHS Devon ICB and Royal Devon University Healthcare NHS Foundation Trust
- PCL Planning on behalf of Waddeton Park
- Royal Society for the Protection of Birds
- South West Water
- Sport England
- Union4 Planning
- University of Exeter.

Responses

- 5.1 This section of the statement provides an overview of responses provided to the eighteen survey questions that asked how people felt about different sections of the draft SPD. It then summarises the main issues raised in the nineteen survey questions that asked people for comments on different sections of the draft SPD.

Question 1: How do you feel about the Water Lane vision?

- 5.2 A draft Vision for the future of Water Lane was provided in chapter two of the draft SPD. Thirty-seven people responded to this question.
- 5.3 49% of these respondents stated that they were either happy or satisfied with the draft Vision, 19% were neutral and 32% were either dissatisfied or unhappy.

Question 3: How do you feel about the Water Lane development framework?

- 5.4 A draft development framework was provided in chapter three of the draft SPD, setting out a spatial overview of future development at Water Lane in line with the vision. This included the location of key land-uses and infrastructure.
- 5.5 Thirty-eight people responded to this question. 42% of these respondents stated that they were either happy or satisfied within the draft development framework, 29% were neutral and 29% were either dissatisfied or unhappy.

Question 5: How do you feel about the Memorable Places codes M01 - M06?

- 5.6 The six Memorable Places codes in the draft SPD required development proposals to be informed by contextual analysis, an understanding of the area's character and cultural identity, local engagement, the need to improve the relationship with the River Exe and Canal, key views and heritage assets.
- 5.7 Ten people responded to this question. 60% of these respondents stated that they were either happy or satisfied with the codes and 40% were neutral. None were dissatisfied or unhappy with the codes.

Question 7: How do you feel about the Outstanding Quality code Q01?

- 5.8 Code Q01 set requirements for development at Water Lane to be of outstanding (global city) quality, with a particularly strong focus on Net Zero.
- 5.9 Four people responded to this question. 75% of the respondents stated that they were either happy or satisfied with the code and 25% were neutral. None were dissatisfied or unhappy with the code.

Question 9: How do you feel about the Outstanding Quality codes Q02-Q11?

- 5.10 Codes Q02 to Q11 set a resource strategy for redevelopment at Water Lane that is based on minimising resource consumption and carbon emissions.
- 5.11 Of the four people responded to this question, all stated that they were either happy or satisfied with the codes.

Question 11: How do you feel about the Outstanding Quality codes Q12-Q15?

- 5.12 Codes Q12 to Q15 expanded upon the resource strategy for redevelopment at Water Lane by setting requirements for sustainable construction standards.
- 5.13 Three people responded to this question. 33% of these respondents stated that they were happy with the codes and the remainder were neutral. None were dissatisfied or unhappy with the codes.

Question 13: How do you feel about the Outstanding Quality codes Q16-Q17?

- 5.14 These two codes furthered the resource strategy for redevelopment at Water Lane by requiring proposals to consider long-term stewardship and governance of the site and co-ordinate well with other development proposals in the area.
- 5.15 Three people responded to this question. 66% of these respondents stated that they were either happy or satisfied with the codes and the remainder were neutral. None were dissatisfied or unhappy with the codes.

Question 15: How do you feel about the Welcoming Neighbourhoods codes W01-W09?

- 5.16 These nine codes set requirements for different land uses and activities within Water Lane, including homes, a neighbourhood centre, a primary school, water-related uses, employment and utilities.
- 5.17 Six people responded to this question. 33% of these respondents stated that they were satisfied within the codes, 50% were neutral and 17% were unhappy.

Question 17: How do you feel about the Welcoming Neighbourhoods codes W10-W12?

- 5.18 These codes set design requirements for three 'Water Spaces' at Water Lane, comprising Gas Works Place, Gabriel's Wharf and Clapperbrook Hub.
- 5.19 Four people responded to this question. 25% of these respondents stated that they were satisfied with the codes, 50% were neutral and 25% were dissatisfied.

Question 19: How do you feel about the Liveable Buildings codes L01-L13?

- 5.20 These thirteen codes set design requirements for different zones with Water Lane, to help ensure that the built form and density of development is appropriate to context. The codes

identified building density ranges and maximum heights and set parameters for massing, street ratios and frontages.

- 5.21 Fourteen people responded to this question. 21% of these respondents stated that they were either happy or satisfied with the codes, 29% were neutral and 50% were either dissatisfied or unhappy.

Question 21: How do you feel about the Liveable Buildings codes L14-L24?

- 5.22 These codes provided site-wide design requirements relating to residential amenity and street frontages.
- 5.23 Eleven people responded to this question. 45% of these respondents stated that they were either happy or satisfied with the codes, 45% were neutral and 10% were unhappy.

Question 23: How do you feel about the Active Streets codes A01-A02?

- 5.24 These two codes set a mobility strategy and related plan for Water Lane led by the vision to create a low car and healthy neighbourhood, with streets for active travel, socialising and play.
- 5.25 Eleven people responded to this question. 36% of these respondents stated that they were happy or satisfied with the codes, 18% were neutral and 45% were either dissatisfied or unhappy.

Question 25: How do you feel about the Active Streets codes A03-A10?

- 5.26 These codes expanded upon the mobility strategy and plan by setting site wide requirements for mobility at Water Lane. This included in relation to the design of streets and junctions, and the provision of public transport, mobility hubs, car, cycle and mobility parking.
- 5.27 Six people responded to this question. 66% of these respondents were either happy or satisfied with the codes, 17% were neutral and 17% were unhappy.

Question 27: How do you feel about the Active Streets codes A11-A22?

- 5.28 This set of codes provided design requirements and an overall mobility plan for streets within Water Lane, based on their role, function and location.
- 5.29 Nine people responded to this question. 56% of these respondents were either happy or satisfied with the codes, 22% were neutral and 22% were unhappy.

Question 29: How do you feel about the Active Streets codes A23-A26?

- 5.30 These three codes set requirements for improvements to the Canal towpath within the site, the crossings of the Exeter Canal and railway line and a number of other key travel links in the surrounding area, in order to support the draft SPD's mobility strategy.

- 5.31 Eight people responded to this question. 38% of these respondents were happy with the codes, 38% were neutral and the remainder were unhappy.

Question 31: How do you feel about the Spaces for People and Wildlife codes S01-S11?

- 5.32 These eleven codes set site-wide requirements for the provision and quality of green infrastructure (including residential open space), biodiversity and sustainable urban drainage.
- 5.33 Seven people responded to this question. 71% of these respondents stated that they were happy or satisfied with the codes and 29% were dissatisfied or unhappy.

Question 33: How do you feel about the Spaces for People and Wildlife codes S12-S15?

- 5.34 These codes set design requirements for the public spaces that either already exist at Water Lane or are identified in the draft development framework, namely the community green space, the Canal, the railway embankment and Grace Road Fields.
- 5.35 Four people responded to this question. 75% of the respondents were happy or satisfied with the codes and the remainder were neutral.

Question 35: How do you feel about the Connected Culture codes C01-C05?

- 5.36 These five codes sought to embed local culture within any redevelopment that takes place at Water Lane, to support its identity and create a strong base for future investment and success.
- 5.37 Five people responded to this question. 80% of these respondents were either happy or satisfied with the codes and the remainder were neutral.

Free-text questions: These are discussed together in the following section

Question 2: Do you have any comments on the Water Lane vision?

Question 4: Do you have any comments on the Water Lane development framework?

Question 6: Do you have any comments on the Memorable Places codes M01 - M06?

Question 8: Do you have any comments on the Outstanding Quality code Q01?

Question 10: Do you have any comments on the Outstanding Quality codes Q02 - Q11?

Question 12: Do you have any comments on the Outstanding Quality codes Q12-Q15?

Question 14: Do you have any comments on the Outstanding Quality codes Q16 - Q17?

Question 16: Do you have any comments on the Welcoming Neighbourhoods codes W01-W09?

Question 18: Do you have any comments on the Welcoming Neighbourhoods codes W10-W12?

Question 20: Do you have any comments on the Liveable Buildings codes L01-L13?

Question 22: Do you have any comments on the Liveable Buildings codes L14-L24?

Question 24: Do you have any comments on the Active Streets codes A01-A02?

Question 26: Do you have any comments on the Active Streets codes A03-A10?

Question 28: Do you have any comments on the Active Streets codes A11-A22?

Question 30: Do you have any comments on the Active Streets codes A23-A26?

Question 32: Do you have any comments on the Spaces for People and Wildlife codes S01-S11?

Question 34: Do you have any comments on the Spaces for People and Wildlife codes S12-S15?

Question 36: Do you have any comments on the Connected Culture codes C01-C05?

Question 37: Are there any other comments you would like to make on the Liveable Water Lane SPD?

5.38 The table below sets out the number of people that responded to each of these questions.

Question number	Number of responses
2	32
4	26
6	17
8	5
10	9
12	8
14	7
16	20
18	12
20	22
22	17
24	17
26	11
28	12
30	11
32	15
34	12
36	8

5.39 The main topics of response and comments are summarised below. A table showing all of the comments in full is provided at Appendix A.

- Primary school
 - Greater clarity is needed on the size and location of the primary school;
 - More flexibility is needed on the location of the primary school;
 - Constraints that will affect the location of the primary school, including flood risk and utilities infrastructure, need greater consideration; and
 - Early delivery of the primary school is essential, to support place-making.
- Access, movement and parking
 - Further consideration is needed of the means of access to 'Water Lane North';
 - Development will impact negatively upon Alphington Road, e.g. in terms of congestion and pollution;
 - There is insufficient market interest to support low-car development at Water Lane;

- Significant public transport and active travel infrastructure improvements are needed to support low-car development at Water Lane and these will/may not be deliverable;
 - Development at Water Lane should be a car-free development to support the Net Zero agenda;
 - Clapperbrook Bridge and Water Lane may not be capable of accommodating a bus service;
 - A cycle super-highway is needed adjacent to the railway line and/or segregated cycle and pedestrian routes should be provided, to prevent conflicts between users;
 - The canal towpath is too narrow to safely accommodate pedestrians and cyclists;
 - Low-car development may increase on-street parking in neighbouring areas;
 - Access and car parking must be safeguarded to support tourism and leisure uses in the area and for existing residents and businesses;
 - It is not clear if the primary mobility hub will replace all existing public car parks;
 - Clarity should be provided on the off-site travel infrastructure required to support development (e.g. Mallison's Bridge), so that contributions can be sought from developers; and
 - The nature of the link between Marsh Barton and Water Lane should be clarified (i.e. a new bridge or an upgrade of the existing underpass).
- Height and density / heritage / design
 - The higher densities and heights coded for in the SPD may/will impact negatively upon existing residents, ecology, leisure use/navigation of the canal and heritage;
 - A Heritage Impact Assessment of Water Lane should be undertaken to evidence the heights and densities coded for in the SPD;
 - A code for designing-out crime should be provided; and
 - Greater mention should be made of the Harbour's Heritage Harbour status.
- Flood risk
 - Flood risk will constrain development at Water Lane.
- Water-related uses
 - Development should support the area's water-based community and promote water-based uses;
 - The Exeter Water Sports Association should remain on its existing site;
 - Changing facilities and public toilets should be provided in the area;
 - A new pedestrian and cycle bridge over the canal could impact negatively upon the use of the canal;
 - At least one craning point (and hardstanding) is needed for large boats and clarity should be provided on its location;
 - There is a need for new slipways in the area; and
 - A clearer vision for Gabriel's Wharf is needed, focussed on water-related use.
- Other leisure uses
 - A clearer vision for Bromham's Farm is needed.

- Housing mix
 - A mix of housing of housing should be planned for, not just co-living and apartments;
 - Affordable housing must be provided; and
 - Sheltered housing must be provided.

- Employment
 - The SPD should not be adopted until the Council have demonstrated how it plans to meet Exeter's employment needs.

- Public and residential open space
 - It is not clear how much open space will be required / whether sufficient is being planned for;
 - It may be unsafe to locate community growing areas along the rail embankment; and
 - The role of Grace Road Fields should clarified.

- Utilities infrastructure
 - There may be a need to improve existing sewage and water infrastructure to support development at Water Lane;
 - The canal's ecological health may be harmed by surface water discharge from development; and
 - If retained in situ, the solar farm may impact negatively on future residents and visitors.

- Stewardship and adoption
 - Greater clarity is needed on how highways, public realm and other facilities will be managed.

- Phasing and delivery
 - Greater clarity is needed on when infrastructure will be provided; and
 - The Council must demonstrate that the SPD is deliverable.

- Other comments
 - The SPD should be more exacting and precise; and
 - The SPD should be re-ordered to improve clarity and understanding.

Post consultation Liveable Water Lane SPD amendments

- 6.1 The consultation responses received led to a significant number of amendments being made to the SPD. The amendments are too numerous to summarise. Instead, Appendix A provides a response to each of the consultation comments received, including where these resulted in an amendment(s) to the SPD.
- 6.2 As a result of the consultation, a series of additional technical studies were commissioned by the Council to inform the SPD. These comprised the Water Lane Primary School Options Appraisal¹, the Haven Road Position Statement², the Liveable Water Lane SPD Transport and Mobility Technical Note³ and the Water Lane Views Analysis⁴.

¹ Water Lane Primary School Options Appraisal. June 2024. Atkins Realis.

² Haven Road Position Statement. March 2024. SLR.

³ Liveable Water Lane SPD Transport and Mobility Technical Note. June 2024. SLR.

⁴ Water Lane Views Analysis. June 2024. Allies and Morrison..

Strategic Environmental Appraisal

- 7.1 In consulting on this SPD, a Strategic Environmental Appraisal Initial Screening Statement was prepared. The Initial Screening Statement concluded that, for the reasons explained in the Statement, the SPD will not have significant environmental effects and therefore does not require a Strategic Environmental Assessment.
- 7.2 The Environment Agency, Historic England and Natural England were consulted on the Initial Screening Statement, in accordance with section 4 of the Environmental Assessment of Plans and Programmes Regulations 2004.
- 7.3 In its response to the SEA consultation, Natural England responded that, in so far, as their strategic environmental interests are concerned, there are unlikely to be significant environmental effects from the SPD.
- 7.4 In its initial response to the SEA consultation, Historic England recommended that the Council either prepare further evidence relating to important views into, out of, and across Exeter including historically significant views, or undertake a proportionate Heritage Impact Assessment to inform the parameters of the SPD. In light of this response, the Council commissioned consultants to prepare the aforementioned Water Lane Views Analysis. Historic England were consulted on the results of Analysis and, consequently, recommended some further amendments to the SPD. The amendments were made by the Council and Historic England concluded that there are unlikely to be significant effects from the SPD.
- 7.5 The Environment Agency did not respond to the SEA consultation.

Conclusion

- 8.1 Consultation on the Liveable Water Lane SPD received a good response, including from statutory consultees, stakeholders and individuals. Constructive comments were provided and many of these resulted in amendments being made to the SPD post-consultation. Where a comment did not result in amendments being made, the reason has been provided in Appendix A. The table in Appendix A includes responses to all consultation comments received.

Appendix A – Table of all consultation comments received and Exeter City Council’s responses

Q2. Do you have any comments on the Water Lane Vision?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	<p>Vision Water Lane – the opportunity (p. 14) The first paragraph should differentiate between the Water Lane area and the development opportunity within it. The sentences at present are at odds with themselves. Suggest rewriting along the lines of:</p> <p>Water Lane is an exciting and totally unique development opportunity for Exeter. It is located by the River Exe and Riverside Valley Park, which are valued landscapes and noted tourist and leisure destinations. The area also has an incredibly rich industrial and maritime history and still includes a functioning harbour served by the Exeter Ship Canal, which are part of the Port of Exeter. Water Lane is a convenient (15 minute?) walk from the City Centre and is served by two train stations, but the development site is underutilised and disconnected. It provides an opportunity to rethink the nature of communities and connectivity in Exeter (starting with walking and cycling).</p>	Comment noted. The Vision has been amended to clarify the development opportunities at Water Lane.
		(pp. 15-16): In the heading to the collage, we suggest clarifying its relevance to the SPD by inserting ‘that will guide the planning principles that follow’ after the words ‘opportunities within Water Lane’ and amending the rest accordingly.	Comment noted. The heading has been amended to: "...from Water Lane which highlight some of its great opportunities and precedent images...in the future. These have helped to guide the contents of this SPD."
		The caption, ‘The most exciting opportunity in Exeter’ and the accompanying image should be re-thought.	Comment noted. The image of Battersea Power Station has been deleted.

Name	Organisation	Comment	Response
		<p>Water Lane placemaking principles We suggest the introductory paragraph (p.17) should read (the amendments are in italics): ‘The seven placemaking principles in this section describe what each of the Liveable Exeter Principles will mean for Water Lane. The principles are used to structure the Code to ensure all its requirements help to achieve the Vision. ...’ etc.</p>	<p>Comment noted. The introductory paragraph on page 22 has been amended to “The seven placemaking principles in this section describe what each of the Liveable Exeter Principles will mean for Water Lane. The principles are used to structure the Code to ensure all its requirements help to achieve the Vision. Each...”</p>
		<p>It is easy to be confused by the use of the ‘present aspirational’ tense in the text that accompanies the illustrations on pp. 17-18. We suggest the texts should be rewritten. In Principle 2 ‘Outstanding Quality’, winning an award is not a principle but a desired outcome.</p>	<p>Comment noted. The tense of the accompanying text to the seven principles has been amended accordingly and reference to award winning has been deleted.</p>
		<p>Water Lane Vision (p.19) We suggest recasting the ‘present visionary’ tense in 2.3 Water Lane Vision by amending the section heading to read: ‘2.3 Water Lane Vision – What it will be like’, and rewriting the paragraphs in the plain future tense, beginning ‘Water Lane will be a truly unique neighbourhood in Exeter and its regeneration a catalyst for transformation across the City. The River and Canal will be ...’ etc. Similarly at various other points in the draft where the ‘present visionary’ is used. Is this style really appropriate in an SPD? Are we overusing ‘unique’? Water Lane won’t be ‘truly’ unique in the future because its regeneration will be a catalyst for similar Liveable Exeter principles across the City. It will be more a trend or quality ground breaker. However, it is definitely a ‘unique development opportunity’ for Exeter at present, as previously said.</p>	<p>Comment noted. The tense for the Vision and Future Visions has been amended accordingly. The Vision has been amended to remove the use of the word “unique”. Reference to the working Canal Basin has been added.</p>

Name	Organisation	Comment	Response
		The reference in '2.3 Water Lane Vision', 2nd paragraph, lines 3-4, to the 'working Canal' is good: could we add 'and Basin'?	
		Delivering the Water Lane Vision (p. 133) It should be included that access and functionality of the waterway must be maintained during the different stages of construction and delivery. Developers should consult users and stakeholders in planning each stage.	Comment noted. The Council is satisfied that the SPD will ensure that access and functionality of the waterway is maintained. Code M03 specifically requires applicants to demonstrate a comprehensive understanding of the local area including its function as a working harbour. Code M02 is clear that applicants must engage with the local community from an early stage.
-	Exeter Civic Society	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.	Comment noted. Chapter 5 has been brought forward to appear as part of chapter 2.
		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.	Comment noted. The National Design Guide is referenced on page 10 of the SPD in the section about the NPPF. It is also mentioned on page 26.
		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	Comment noted. Repeating the Vision statements in chapter 2 would add unnecessary length to the SPD and an expanded Framework chapter is not necessary. However, section 2.3 has been amended provide an introductory paragraph which

Name	Organisation	Comment	Response
		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?	explains the evolution of the Vision and references the seven vision statements.
		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 landowners.	Support noted.
		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.	Comment noted. Page 26 is clear that adoption of streets by the local highway authority is preferred, as advised by Devon County Council. Where they are not to be adopted, code Q17 has been strengthened to require agreement of a robust alternative approach to management and maintenance.
		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?	Comment noted. The text has been corrected to "Going forwards, the local community will continue to be involved in the stewardship and life of the neighbourhood on an ongoing basis."
		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.	Comment noted. The SPD reflects viability policy set out in the National Planning Policy Framework. The local planning authority cannot deviate from this policy. The Infrastructure Delivery Plan for the Exeter Plan and the SPD will help developers and landowners factor-in all relevant constraints, infrastructure and other planning policy requirements when valuing land at Water Lane.
		Document needs SMART objectives specific, measurable, achievable, realistic, and timely to help readers understand	Comment noted. Where appropriate under existing adopted planning policy, codes within the SPD have been amended to

Name	Organisation	Comment	Response
		<p>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?</p> <p>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.</p>	<p>provide greater clarity and/or specification. Disagree. Page 17 of the SPD explains which elements of the Code are requirements (i.e., the text within coloured boxes) and the purpose of the graphics, precedent images and supporting text.</p> <p>Comment noted. The Council has no plans to move the solar farm.</p>
-	NHS Local Planning Authority Engagement	<p>Liveable Exeter</p> <p>The NHS supports the vision of a 'healthy and inclusive city' via its close working relationship with Exeter City Council and our engagement with the Local Plan making process. Both GP and other NHS services are an integral part of well-connected neighbourhoods and are continually working to provide care within locally communities whilst at the same time making best use of its limited resources and capacity. NHS Devon ICB and RDUH are contributing to the Local Plan and will be submitting their infrastructure projects as part of the IDP.</p>	Support noted and comment noted.
-	Sport England	<p>Introduction</p> <ul style="list-style-type: none"> • Grace Road playing fields (now disused). <ul style="list-style-type: none"> o Sport England would like to be a key stakeholder in the consultation for Grace Road playing fields as the principal use of the site was previously for sport and physical activity. • Sport England fully support that Active Design has informed the principles and requirements within the design code. 	Support noted and comment noted. Sport England will be consulted as a key stakeholder on future proposals for Grace Road Field.

Name	Organisation	Comment	Response
-	-	I hope it will be a vision that people already living in the area can benefit from. It would be awful if they were to be displaced by Airbnb flats and new wealthier residents	Comment noted. The Vision for Water Lane has been shaped by early engagement with the local community. The Government has recently consulted on a proposed change to planning policy that could give local planning authorities greater control over the creation of short-term holiday lets. Exeter City Council is awaiting the outcome of that consultation. The City Council already has a planning policy in place to seek 35% affordable housing on developments of 10 homes or more (or 20% where the development is for build-to-rent housing) and proposes to retain this policy in the new Exeter Plan.
-	-	The use of local sourced sustainable building materials should be highly encouraged to ensure carbon is embedded, rather than emitted during the manufacturing processes. Examples include: plyscrapers, wood fibre insulation, aluminium clad wood windows with vacuum or triple glazing, living walls and roofs, timber cladding.	Comment noted. Codes within the SPD (e.g. Q02) require development proposals to minimise resource use and carbon emissions. The use of locally-sourced sustainable building materials would likely contribute towards this.
-	-	In principle I agree with the gist of the vision, but I fear the ***** is in the detail. I think it is important that new developments do not obstruct the views of existing residents and that plans should maintain existing historic buildings that bring character to the area and remind residents of its history. I am concerned that the wider city strategy calls for high density housing in the Water Lane area, and yet it's the space around Water Lane that gives the area a more relaxed, stress-free atmosphere. Tall buildings, especially very close to the water, will make the area claustrophobic, and designs which are too modern may not stand the test of time. I think it is also important that building and architecture isn't limited to a single company. Part of the character of the area is due to the fact that existing developments all have a unique style, and	Comment noted. The planning system works in the public interest and does not afford protection to specific private views. However, the outlook of homes is very important, and the Council has planning policies in place to ensure that outlook is taken into account in the planning balance. The codes in the Memorable Places chapter are intended to ensure that development maintains Water Lane's historic industrial and maritime sense of place, including through the retention and re-use of historic and existing buildings/features. The SPD as a whole is intended to ensure that development at Water Lane is of a high quality.

Name	Organisation	Comment	Response
		I would not want to see a homogenous estate built up in Water Lane.	
		I'd also like more clear protections laid out for the water-based community. The maps of the plans suggest that the Sea Cadets are not protected. I would also like to see the hard standings for boats maintained which gives the area a character unique to anywhere else in Exeter, and more guarantees/rights for people who live on boats in the area.	Comment noted. There are no current development proposals that would affect the Sea Cadets Hut. As a community facility, the Hut is protected under existing (and emerging) planning policy and would need to be suitably replaced should it ever be redeveloped. The Regulating Plan and code W02 show the retention of boat storage on the southern side of the Canal Basin and code W05 sets out requirements to ensure that the Water Lane remains a true waterside community. However, as a planning document, the SPD cannot cover matters relating to the rights of boat dwellers.
		I am also concerned about the loss of some of the more industrial business brownfield sites. For example, both the Water Lane proposal and Marsh Barton would see the loss of independent garages and force car owners to drive to the city limits for repairs and MOTs, while having these facilities locally helps being people to the area who can easily walk into the city for their work.	Comment noted. The 2022 Exeter Employment Study concludes that existing employment premises and sites at Water Lane are of poor quality, but the area has the potential to provide for new employment opportunities that can be accessed on foot, cycle and public transport.
		As a cyclist I value the emphasis placed on active streets but think the policies also need to consider the practicalities of current and future residents, something which I do not trust the council will consider fully if the Haven Banks regeneration project is anything to go by. Residents will need access to cars for their work and hobbies, and larger families will need them for day-to-day activities: I can carry a week's shopping for one on my bike; anyone shopping for more people needs a car.	Comment noted. The City Council is committed to ensuring that Water Lane is developed as a low car neighbourhood with excellent active travel facilities. Indeed, this is the only way that Water Lane can be redeveloped, as the Alphington Road corridor is at capacity.
-	-	The introduction states that the 'historic character of the area' will be respected. This does not appear to be the case.	Comment noted. The City Council is committed to this being the case. The codes in the Memorable Places chapter are

Name	Organisation	Comment	Response
			intended to ensure that development maintains Water Lane's historic industrial and maritime sense of place.
-	-	The principles are acceptable - but unfortunately the specific proposals fail to live up to them.	Comment noted. The Council is satisfied that the development framework and design code (as amended following consultation), together with emerging and existing planning policies in the Exeter Local Plan First Review, Exeter Core Strategy and Exeter Plan, will enable the delivery of a high-quality new neighbourhood at Water Lane.
		It's an exciting vision and I fully support it. I live near Water Lane and travel through it regularly (by bike) - I have often thought that it has great potential to be revived and better used.	Support noted.
		In principle, I agree with this, I can see that this is underused land with great potential. It has good transport connections and is close to green and blue space. I think it could potentially be a really nice place to live, if done well and that they would not be a big negative impact in terms of removal of what's already there, as there's not that much there already. My primary concerns would be:	Support noted.
		1. Alphington Road is already terrible. It's dangerous and unpleasant to cycle along, horrible to walk near due to all the traffic air pollution. It's frustrating to cross as the lights take forever and give priority to traffic! As somebody that lives on the St Thomas side of Alphington Road and frequently needs to cross it to get to the valley parks, into town or to the Quay, I would really like to see improvements to Alphington Road to give more priority to pedestrians and cyclists. The traffic congestion will only be exacerbated by more dwellings in the vicinity, regardless of great aspirations for it being an active travel development,	Comment noted. Code A30 requires development proposals to explore opportunities to improve active travel links to key destinations, including along Alphington Road.

Name	Organisation	Comment	Response
		so please consider also the needs of people living on the other side of Alphington Road to this proposed development.	
		2. This is linked to the Exe Bridges proposal. If there will be all this new housing in water Lane, it's even more important to retain the retail facilities at Exe bridges retail Park, which are so important for St Thomas community.	Comment noted. The SPD plans for the provision of a new Neighbourhood Centre at Water Lane, to include local retail facilities. Water Lane is also within walking and cycling distance of retail facilities in the city centre and Cowick Street local centre. Exe Bridges Retail Park is a proposed residential-led site allocation in the Full Draft Exeter Plan, but this could involve the retention of retail uses on the site, for example at ground floor level.
		3. Grace Road playing field is not disused, it is well used by dog walkers and Parkrun, it be great if it could be retained as an open space for recreational use.	Comment noted. Grace Road Fields is no longer formally designated as a playing field as it is not fit for purpose.
		4. The vision mentioned this area will be well connected for jobs, but I am wondering how that links to the proposed development for Marsh Barton, which presumably means getting rid of a lot of businesses there, which will mean there are less jobs (on the industrial estate).	Comment noted. Marsh Barton is one of Exeter's main employment areas. However, it is currently developed at a low density and so there may be an opportunity for it (or areas of it) to be redeveloped as a high-quality mixed-use neighbourhood. This would include the provision of significant employment space – indeed the site allocation policy in the emerging Exeter Plan requires existing levels of employment to be re-provided at Marsh Barton, but at higher densities to make more efficient use of land.
		5. It would be great to see improved public transport around this area, currently only one bus runs along Alphington Road and it's not that frequent. Getting to the University from St Thomas takes an hour and requires a change of buses with a 20-minute wait in between them. Obviously active travel is better but when you have an injury or limited mobility you rely on the buses so it would be good if there were better direct bus connections to other parts of the city.	Comment noted. The SPD includes proposals and requirements to improve bus facilities through Water Lane, to support the creation of a low-car neighbourhood. The City Council will continue to work with Stagecoach, who provide the City's bus services, to encourage improved services.

Name	Organisation	Comment	Response
-	-	It's an exciting vision and I fully support it. I live near Water Lane and travel through it regularly (by bike) - I have often thought that it has great potential to be revived and better used.	Support noted.
-	RSPB	Support the specific mention of nature and the prioritisation of sustainable travel. The proposed development provides opportunities to create many new nesting sites for birds via integral 'swift bricks' built in as buildings are constructed, and to ensure the public realm planting and management provides opportunities for biodiversity (e.g. choice of species so they provide nectar for pollinators plus berries). Ensuring that the public realm and public spaces of this development provide for nature will also benefit people via enabling daily experience of nature, e.g., seeing swifts and other birds nesting in built-in nest boxes high on the walls of buildings, or seeing bumblebees and hoverflies feeding on nectar-bearing plants.	Support noted.
-	-	Should take into account provision for sheltered retirement accommodation with warden facilities.	Comment noted. Code W06 makes specific mention of the need in Exeter for homes for older people, including extra care housing (based on evidence of need provided by Devon County Council), and requires applicants to liaise and collaborate with relevant local authorities to explore how development at Water Lane can best support this need.
-	-	Buildings should not be too high i.e., not over 3 storeys, as this will cut out light in the area. The density of accommodation appears to be very high for the area.	Comment noted. The Council considers that the building heights and densities proposed in the SPD respond to the site's context. Planning applications for development will be considered on a case-by-case basis and matters to be considered will include the setting of the Valley Park and Quay; daylight, ventilation and outlook; the setting, daylight and amenity of existing residents; and existing site

Name	Organisation	Comment	Response
			<p>characteristics. There are already number of existing buildings in the Water Lane area that are 3 storeys or more in height.</p>
		<p>Does not seem to take into account any defined play areas and play facilities for children.</p>	<p>Comment noted. Code S02 requires proposals for residential development to provide a range of open space in accordance with the Fields In Trust benchmark guidelines, reflecting policy IC4 of the emerging Exeter Plan. These guidelines include, per 1000 people, the provision of 0.6 ha of amenity greenspace within 710 walking distance from home and 1.20 ha of playing pitches within 1.2km of home. Major development proposals may be required to provide appropriate on-site open space, or off-site provision/a financial contribution where this is not appropriate. The SPD requires the provision of Green Streets and Lanes, which are car-free streets that can provide informal high-quality space for play.</p>
		<p>The lack of car parking space, for the number of properties is very inadequate, leading to residents parking on already congested streets and Marsh Barton.</p>	<p>Comment noted. Water Lane is planned as a low-car neighbourhood supported by active travel and public transport infrastructure. Therefore, car parking at Water Lane can be minimised in accordance with code A11. Measures will be taken to ensure that residents are not able to park on streets in neighbouring areas.</p>
		<p>The green area next to Marsh Barton Station should be used for child facilities i.e., football fields, basketball courts, children's play area with facilities. Parents could use the proposed cafe across the swing bridge to get a cup of tea, whilst the children play.</p>	<p>Comment noted. Poor ground conditions at Grace Road Fields mean that it is no longer officially designated as a playing field by the City Council and is unsuitable for use as recreational open space. However, code W12 for Clapperbrook Hub (adjacent to the station) lists a city-scale play space, outdoor activity centre and café as potentially suitable uses in this area.</p>
		<p>Toilet facilities do not seem to be taken into account for the public, when using this area i.e., cafe across the swing bridge, in the whole of the development on Water Lane i.e., cafes.</p>	<p>Comment noted. A new café is likely to include provision of toilets for customers. Proposals for new public toilets may come forwards under code W05.</p>

Name	Organisation	Comment	Response
-	-	I think flooding is a massive issue. All these future projections we are told about. St Thomas will be hard hit!! Where is water lane, yes in St Thomas, it could be a disaster in the making.	Comment noted. Water Lane is within flood zones 2 and 3. Alongside existing national and local planning policies, the SPD will ensure that new development at Water Lane is designed to reflect this significant constraint. For example, there may be streets where residential uses cannot be located on the ground floor and it will also be necessary to ensure that development does not increase the flood risk in other areas of the city. Flood resilience measures will need be required, in line with best practice and a strategic flood access and egress route. A study to inform the route is being undertaken.
		Also, no new roads in or out of a big development. Congestion, pollution, do I need to go on.	Comment noted. The SPD does not provide for any new roads in or out of Water Lane, which is planned as a low-car neighbourhood.
-	-	Building sustainable communities on brownfield sites, close to local facilities with good transport links is clearly the best way for cities to help meet housing needs and to avoid the pattern of isolated developments on the outer fringes of cities where facilities are limited and residents have to rely on car use to access schools, shops etc.	Support noted.
-	-	Reopen maritime museum instead	Comment noted. There are currently no plans to open a maritime museum in Exeter.
-	-	The housing is too intense taking away the leisurely feel of the area. Buildings over 4 storeys high will stop the area being navigable by walking for cycling and over-power the individual or family enjoying a walk in the area or along the canal. At present there is green ways along the canal which is helpful for health and wellbeing, and we need to keep more green spaces and less brick walls (such as sides of building).	Comment noted. The Council considers that the building heights and densities proposed in the SPD respond to the site's context. Planning applications for development will be considered on a case-by-case basis and matters to be considered will include the setting of the Valley Park and Quay; daylight, ventilation and outlook; the setting, daylight and amenity of existing residents; and existing site characteristics. The SPD includes a number of codes to ensure that Water Lane includes high quality green infrastructure including open space (Codes S01-S12) and

Name	Organisation	Comment	Response
			Green Streets and Lanes (Code A25 and A26). Codes L05, L12 and L13 require buildings to be set back from the Canal to provide continuous public access and avoid overshadowing the Canal. Code A28 requires options to be explored to widen the Canal towpath to better accommodate cycles, pedestrians and people using mobility scooters, wheelchairs and prams.
-	-	General – why do none of the maps include street names? It is quite difficult to orientate and place where things are from a bird’s eye view without them.	Comment noted. The maps in the SPD are to scale and some (e.g., the Development Framework) include key landmarks. On balance, it is considered that the addition of further text (e.g., street names) would make the maps overly complicated and therefore difficult to interpret.
-	-	Fine in theory, but until or unless there is a decent system of public transport, then any attempt to reduce car usage will be futile.	Comment noted. The Council will continue to work with public transport and other active travel providers to ensure that Water Lane can develop as a high quality low-car neighbourhood.
-	-	Got my vote of no confidence in the local government	Comment noted.
-	-	The density aspect is concerning. There should be a respectful reflection of the history of the area, the visual impact of previous industries and housing which established the area as a mixed community. To break the skyline with tall buildings is incongruous to that. We have seen what damage the 'Gorge' has done to New Town by protruding like a sore thumb, a barnacle on the environmental harmony of the history of that area. 9 storey apartments would have the same effect. Nothing should be higher than the old gasometers were when filled. The skyline has been topped by views of the cathedral on its mount. This should be enhanced by creative positioning and design. What quality of life does someone living above 5 floors have - it's not great and increases that feeling of daily claustrophobia for those walking/riding past or living nearby. In this modern world	Comment noted. The Council considers that the building heights and densities proposed in the SPD respond to the site’s context. Planning applications for development will be considered on a case-by-case basis and matters to be considered will include the setting of the Valley Park and Quay; daylight, ventilation and outlook; the setting, daylight and amenity of existing residents; and existing site characteristics. The codes in the SPD are intended to ensure that existing and new residents at Water Lane are provided with a high-quality living environment.

Name	Organisation	Comment	Response
		of quality of living, there is no need to shorten people's lives by providing overshadowing, tall buildings casting darkness and gloom over the surrounding area.	
-	-	Sounds broadly fantastic. A little bit worried by the 'taller buildings'.	Comment noted. The Council considers that the building heights and densities proposed in the SPD respond to the site's context. Planning applications for development will be considered on a case-by-case basis and matters to be considered will include the setting of the Valley Park and Quay; daylight, ventilation and outlook; the setting, daylight and amenity of existing residents; and existing site characteristics.
-	-	I support brownfield development and low traffic neighbourhoods and agree that the homes should be designed for people happy to have a car-free lifestyle. However, I do believe that there needs to be parking available for those who visit the quay and have a genuine need (disabled and those transporting kayaks/canoes - a specific car park and slipway for local kayakers would be useful). Space for nature, needs to be "for nature" and not a sanitised version of what people think "looks nice" and thus there should be proper wild corridors to help nature prosper. I agree that there should be significant tree-planting. My greatest concern is about who this area is being developed for. I would like to see the majority of homes to be either social rented, owner-occupied (with covenants to ensure that they are only sold to those people working in Exeter) or specifically rented privately to key workers in Exeter for rental prices commensurate with salaries of those key workers.	Support noted and comment noted. Adequate car parking will be retained to ensure to support local tourism and leisure use of the Canal and Quayside. Code W05 has been amended, requiring opportunities to be explored to improve the existing slipway at West Quay. Codes in section 4.6 of the SPD seek to ensure that Water Lane is developed to support and enhance wildlife. Code W06 requires development to provide a mix of housing. The City Council already has a planning policy in place to seek 35% affordable housing on developments of 10 homes or more (or 20% where the development is for build-to-rent housing) and proposes to retain this policy in the new Exeter Plan. Local connection criteria are applied to new affordable homes, but it is not feasible for the Council to apply similar restrictions to owner-occupied homes. The Council recently secured affordable homes at The Gorge for key workers and is examining the potential to do similarly at other development sites, which could include Water Lane.
-	Union4 Planning	We strongly support the Water Lane vision and acknowledgement that higher density residential accommodation is at the heart of a thriving new	Support noted.

Name	Organisation	Comment	Response
		community. Wholescale redevelopment will bring back to life this important brownfield land, delivering vitality and vibrancy and significant economic benefits for the whole city and region, whilst protecting undeveloped land on the city outskirts.	
		The low car and car free principle is also strongly supported, as is the improved connectivity and access by more sustainable modes of transport.	Support noted.
-	-	The southern zone of the Water Lane development plan must not include any building over four stories high. This is the current height of the most recently built flats south of the Welcome Inn. Any taller building would be visible from the valley park and Belle Isle park, particularly in winter when many of the trees lose their leaves. It would change the feel of the valley park to be overshadowed and overlooked by any visible housing blocks above this height. It would also interrupt the view of the hills between Exeter and Haldon Ridge and the view of Haldon ridge itself. The interruption of the view of the hills to the west of Exeter would not only affect people using the valley park but also from other parts of the city particularly from streets and houses along Topsham Road and between Topsham Road and the river.	Comment noted. The Council considers that the building heights and densities proposed in the SPD respond to the site's context. Planning applications for development will be considered on a case-by-case basis and matters to be considered will include the setting of the Valley Park and Quay; daylight, ventilation and outlook; the setting, daylight and amenity of existing residents; the retention of key views; and existing site characteristics.
-	Exeter Community Centre Trust	Accept high density, but this must not mean 'overbearing'.	Comment noted. The Council considers that the building heights and densities proposed in the SPD respond to the site's context. Planning applications for development will be considered on a case-by-case basis and matters to be considered will include the setting of the Valley Park and Quay; daylight, ventilation and outlook; the setting, daylight and amenity of existing residents; and existing site characteristics.

Name	Organisation	Comment	Response
		<p>'Where people choose to walk and cycle' must be coupled with prevention of people from elsewhere driving to Water Lane, parking in the street right outside residents' houses, unloading their bicycles and going off for cycle rides along the canal. To that end the residents parking scheme that applies at the top end of Water Lane should be extended right along Water Lane and new residences should have allocated parking spaces.</p>	<p>Comment noted. Measures will be taken to ensure that residents are not able to park on streets in neighbouring areas. Code A11 has been amended to clarify that parking and access rights will be safeguarded for existing residents and landowners.</p>
-	-	<p>Water Lane is definitely not connected to main facilities e.g., RD&E hospital, Nightingale hospital St David's station and is not adapted to those with impaired mobility.</p>	<p>Comment noted. Code A27 requires the provision of a new canal crossing to increase pedestrian/cycle permeability and further improve existing access to key off-site locations including the Hospital and St David's Station. Code A30 identifies a number of off-site connectivity improvements that will support active travel links from Water Lane to key locations, and states that applicants should collaborate with local authorities to identify off-site contributions towards such improvements. The Council will continue to work with public transport and other active travel providers to ensure that Water Lane can develop as a high quality low-car neighbourhood. It is important that new development is designed to meet the movement needs of people with impaired mobility and the SPD has been amended to reflect this.</p>
-	-	<p>Do not believe this will be as stated, looks like a 15-minute scheme. Where are these school etc. As for design, we haven't seen great evidence in recent builds of attractive dwellings. Too much belief in a private bus service which has proved to not care, and schemes that seem to only care about the young, the fit or the well off. So, the nice walks will now be a housing estate, the council cannot manage the river and canal system as it is, letting it silt up and become a rubbish dump.</p>	<p>Comment noted. Code W04 requires the provision of a new two-form entry primary school at Water Lane, in accordance with Devon County Council's requirements. The Council will continue to work with public transport and other active travel providers to ensure that Water Lane can develop as a high quality low-car neighbourhood. The SPD as a whole is intended to ensure that Water Lane is redeveloped to provide an attractive, high quality living environment supported by the facilities and infrastructure (including active travel and</p>

Name	Organisation	Comment	Response
			public transport infrastructure) necessary to enable the majority of residents not to need a private car.
-	-	Flowery rubbish which says nothing	Comment noted.
-	-	As long as there are no high-rise monsters going up we will be happy and parking, co cars and bikes didn't last so I'm afraid cars still need to be used and public bus service in this area are terrible!	Comment noted. The Council considers that the building heights and densities proposed in the SPD respond to the site's context. Planning applications for development will be considered on a case-by-case basis and matters to be considered will include the setting of the Valley Park and Quay; daylight, ventilation and outlook; the setting, daylight and amenity of existing residents; and existing site characteristics. The Council will continue to work with public transport and other active travel providers to ensure that Water Lane can develop as a high quality low-car neighbourhood.
-	-	This project definitely has a lot of promising implications for the city, but my biggest concern will be the entertainment value added to the local area since this site includes the former tenpin bowling alley. So, what entertainment-based areas are there in this area? I would argue that green space is essential, and this project seems to honour that. However, what is there to do in the centre of Exeter for evening activities beyond eating and drinking? The population will need varieties of options for entertainment and venues such as bowling alleys, arcades and mini-golf venues have proven extremely successful in larger cities including London	Support noted and comment noted. The City Council will consider planning applications for new leisure uses in the City on their merits, against existing and emerging planning policies. Codes C01-05 of the SPD identify a range of potential cultural initiatives for the Water Lane area and the SPD seeks to enhance the site as a heritage and water-based destination.
-	-	In principle, I agree with this, I can see that this is underused land with great potential. It has good transport connections and is close to green and blue space. I think it could potentially be a really nice place to live, if done well and that they would not be a big negative impact in terms	Support noted.

Name	Organisation	Comment	Response
		of removal of what's already there, as there's not that much there already.	

Q4. Do you have any comments on the Water Lane Development Framework?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	<p>Development Framework Overview (p. 21)</p> <p>Line 1: What is to be understood by 'illustrative'? Does it mean that the Framework overview as shown is an 'illustration' (i.e., an example), or simply that it is illustrated (i.e., contains images) in which case the word is not necessary. This makes a difference.</p> <p>Penultimate line of the text: 'are explained' should read 'is explained'.</p> <p>Colour coding is used with no reference to a key.</p>	Comment noted. "Illustrative" has been removed from the text and grammatical corrections made. A key has been added.
		(p. 22) For comment on the proposed 'Vibrant waterside space at Gabriel's Wharf', see comment on W11 –Gabriel's Wharf.	Comment noted.
-	Sport England	<p>Illustrative Framework Development</p> <ul style="list-style-type: none"> The outdoor Activity Hub is on the southernmost part of the site. Consider how this could be connected with the new primary school so there is a co-location of facilities and services. Demonstrate how the Active Travel Spine links to the existing high street which may exist outside of the red line boundary of the water lane site. 	<p>Comment noted. The School Feasibility Study prepared by Atkins Realis indicates that the new primary school will need to be located towards the northern end of Water Lane, some distance from the proposed outdoor activity hub. Devon County Council have raised safeguarding concerns with having a split school site/any form of off-site provision of school facilities.</p> <p>Comment noted. Code A30 shows off-site connectivity and improvements that development proposals at Water Lane will be expected to contribute towards. This includes active</p>

Name	Organisation	Comment	Response
		<ul style="list-style-type: none"> • There doesn't appear to be a large provision for green space in terms of sport facilities and playing pitches? There will be an increase in population to this area so consideration around playing fields needs to be accounted for to not put more demand on existing provision. 	<p>travel links from the active travel spine north through Exe Bridges and the quayside area, which then lead to the high street.</p> <p>Comment noted. The Council's Parks and Open Spaces Team is satisfied that the SPD makes adequate provision of sport facilities and playing pitches, taking existing provision in the locality into account.</p>
		<p>Delivering a Successful Neighbourhood</p> <ul style="list-style-type: none"> • Sport England are happy to see that delivering the active streets and services are a priority before housing is delivered in order to seek behaviour change towards more active modes of transportation. • A collaborative process <ul style="list-style-type: none"> o Ensure that there are existing residents and potential users that are involved in the design and development process so that users' needs and understanding of how users will be active in and around the space may be possible. • Ongoing Stewardship <ul style="list-style-type: none"> o Sport England support this principle which sits well within principle 9 and 10 of Active Design. The Town and Country Planning Association (TCPA) have produced a practical guide on Long Term Stewardship in new developments which could help enhance this principle. Ongoing stewardship will help empower people to have a say on how their homes and neighbourhoods are created 	<p>Support noted.</p> <p>Comment noted. Agreed, however it is considered that this would best be covered in the paragraphs on community engagement, page 26. These has been amended accordingly. Code M02 also requires applicants to engage with the local community and local stakeholders at an early stage to understand their aspirations etc.</p> <p>Support noted.</p>

Name	Organisation	Comment	Response
		<p>and managed, providing opportunities for active citizenship.</p> <ul style="list-style-type: none"> •Community Engagement <ul style="list-style-type: none"> o This aligns well with our principle around Activity for All. Community engagement should occur throughout the whole process ensuring that all ages, ethnicities, genders, and abilities, are being actively engaged and listened to. (See Activity for All principle in AD3) 	Support noted. Code M02 has been updated accordingly.
-	-	<p>This area badly needs access to shops such as Aldi and the Range without having to go down to Exebridges. People will want to do their grocery shopping etc at reasonable prices.</p>	<p>Comment noted. Codes W03 and W11 identify local shops as a suitable use within the planned Neighbourhood Centre at Water Lane and at Gabriel's Wharf. These would serve the local community of Water Lane. Larger retail units are not proposed as they rely upon access by motor vehicle and the highway network at Water Lane cannot support this. Code A30 requires development proposals to explore opportunities to improve active travel links to key destinations including Alphington Road, Exe Bridges (and beyond into Cowick Street) and the quayside (and beyond to the city centre).</p>
		<p>The cycle links and pedestrian footpaths down Alphington Road are not fit for the increase numbers of people apparently without cars who will be living in this new area. It all needs to be linked up with existing residential streets and amenities to benefit existing communities along Alphington Road which are now like little islands off of the main road and would benefit from these new amenities.</p>	<p>Comment noted. Code A30 requires development proposals to explore opportunities to improve active travel links to key destinations, including along Alphington Road.</p>
-	-	<p>Infrastructure that prioritises active travel is really important to enable residents to lead healthy lifestyles.</p>	Support noted.
-	-	<p>I like the suggestions for renewable energy but if the mobility hub is the sole parking planned for the development this will not be sufficient. I also feel the city is</p>	<p>Support noted and comment noted. Water Lane is planned as a low-car neighbourhood supported by active travel and public transport infrastructure. Therefore car parking at</p>

Name	Organisation	Comment	Response
		<p>overestimating the value Marsh Barton station will bring to the area. I would find it unlikely for people to access an outdoor activity hub by train. The station will require more frequent services, more bike spaces on the trains that serve the station, and cheaper fares.</p>	<p>Water Lane can be minimised in accordance with code A11. Marsh Barton Station is a significant asset and it is reasonable to expect users to access the Clapperbrook Hub by train, as well as on foot, bicycle and on the water (code W12 notes that the area around the Station has high connectivity for people walking and cycling).</p>
-	-	<p>Any development of the Canal Basin is completely unnecessary, will have a negative impact on the current open spaces, the existing residential houses and apartments and the Canal area near the basin. The existing Water Sports Club buildings should be re-furbished and kept in place as they are -with the attractive club house fronting the Canal. Funding for this could be secured via different sources, not impacting on ECC budgets.</p>	<p>Comment noted. The Canal Basin, as part of the wider Water Lane site, has been allocated for redevelopment in the Exeter Local Plan since it was adopted in 2005. Code W02 has been amended to show the site occupied by the Water Sports Club as a site for residential-led development, with an opportunity for water-related uses fronting the canal basin (e.g., at ground level). The buildings and facilities used by the water sports clubs are, in planning terms, both community and sport facilities. As such, they are protected against loss by policy CP10 of the Exeter Core Strategy (under which the Council would expect any planning application to redevelop these buildings and facilities to provide or contribute towards the provision of new and improved buildings and facilities) and policy L7 of the Exeter Local Plan First Review (under which the loss of sporting facilities which serve a local area will not be permitted if this would harm sports opportunities in the area). These two policies are proposed to be replaced by policy IC3 of the emerging Exeter Plan, which states that existing services and facilities that meet community, social, health...cultural, leisure and recreation needs will be protected, unless it can be demonstrated that they are surplus to requirements or sufficient/improved provision is to be provided. It also states that proposals to provide new or improved community services and facilities will be supported. Therefore the water sports clubs' buildings and</p>

Name	Organisation	Comment	Response
		<p>The framework mentions that the development should predominantly consist of apartments. It is not clear whether these are for rent or for sale. In any case, it needs to be understood that apartments, whilst allowing higher density, are very high in maintenance and operational costs, therefore having a negative impact on rents and the resulting cost of living. Build-to-rent blocks are typically owned by investment companies, then operated by another company, hence incorporating two profit margins, which are passed on to the tenants. As a consequence, the average rent will rise in all parts the city. We have already seen this happening. Owned apartments also require costly management and maintenance, which adds to the ongoing costs for the owners (e.g., the monthly management charge for a 2-bed apartment at Waterside is £248). Furthermore, high-rent apartments create a transient population as occupants frequently only stay until they find somewhere more affordable (cf. Southernhay Build-To-Rent).</p>	<p>facilities are afforded a significant amount of protection under both the existing and emerging development plan.</p> <p>Comment noted. The Council have a planning policy in place that seeks to secure 35% affordable housing on all sites proposing 10 homes or more (or 20% affordable housing in the case of Build to Rent developments, as per national planning policy). Code W06 seeks to ensure the delivery of a mix of housing to cater for a broad demographic.</p>
-	-	The principles are acceptable - but unfortunately the specific proposals fail to live up to them.	Comment noted. The Council is satisfied that the development framework and design code (as amended following consultation), together with emerging and existing planning policies in the Exeter Local Plan First Review, Exeter Core Strategy and Exeter Plan, will enable the delivery of a high-quality new neighbourhood at Water Lane.
-	-	I hope the 'vibrant waterside space at Gabriel's Wharf' includes some maritime industry/activity and is not merely a collection of canal side eateries.	Comment noted. Code W11 has been amended to reinforce Gabriel's Wharf as an important location for water-related uses.
-	The Diocese of Exeter	It is essential that the planning for and resourcing of community services and facilities (both those subject to	Comment noted. An Infrastructure Delivery Plan is being prepared to support the new Exeter Plan and will include

Name	Organisation	Comment	Response
		<p>statutory requirements and also those that are non-statutory but the need for which nevertheless arises from the development) in Water Lane is appropriately co-ordinated (through the IDP or some other effective mechanism) with initial planning for the re-development of Marsh Barton. Some services and facilities will be separate and specific to each of the communities, but others may only need to be provided once across both areas, given their close physical relationship and potentially successive development timetables. The Local Authority will need to plan proactively with partner organisations to ensure that sufficient provision is made in a timely fashion across the Water Lane / Marsh Barton continuum of development.</p>	<p>strategic consideration of the provision of/need for new infrastructure at site allocations such as Water Lane.</p>
-	-	<p>I think this is a good proposal, a good use of underused land close to public transport, green space and blue space. I think the Water Lane proposed development will be a nice place to live, if done well. I'm happy to see a potential new bridge opposite Gabriel's Wharf, that will be a great addition.</p> <p>I have a couple of concerns:</p>	<p>Support noted.</p>
		<p>1. Alphington Road is terrible. It's dangerous and unpleasant to cycle along because of all the traffic and there is no proper bike lane. It's horrible to walk along because of all the air pollution and traffic. It's really frustrating to cross as the lights take forever and give traffic priority over pedestrians. It must be horrible for the people living along that road. Getting a bus from town into St Thomas you frequently get stuck in traffic on Exe Bridges caused by congestion on Alphington Road. Although this is proposed as an active travel development, I think there will inevitably be increase in traffic as a result of it and as</p>	<p>Comment noted. Code A30 requires development proposals to explore opportunities to improve active travel links to key destinations, including along Alphington Road.</p>

Name	Organisation	Comment	Response
		<p>somebody that lives on the other side of Alphington Road in St Thomas, I frequently need to cross Alphington Road to get into town, to the quay or to the Riverside Valley Park. I would like to see alongside this development proposals to improve Alphington Road to make it better for pedestrians and cyclists e.g., segregated bike lanes, less traffic, giving pedestrians priority when crossing so you don't have to wait so long. Consider limiting traffic or certain types of vehicles e.g., the most polluting and big lorries. It would be great if all the traffic into the industrial estate came in from the outside of Exeter rather than driving over Exe Bridges & along Alphington Road.</p>	
		<p>2. I think this proposal is linked to the Exe Bridges one. If there are going to be new dwellings in this area, the Exe Bridges retail park is even more important as a local shopping facility for the St Thomas/Water Lane communities. It's easy walking distance from this proposed development and has a good range of shopping facilities that the people that live here will need. Although Water Lane is proposed as an active travel development if there are no shopping facilities locally and people don't want to go into town, there's more chance they will drive to an out-of-town supermarket. This proposed development could really contribute to the community south of the river and It's important there are adequate local shopping facilities for those of us living in this area that don't want to go all the way into town.</p>	<p>Comment noted. The SPD plans for the provision of a new Neighbourhood Centre at Water Lane, to include local retail facilities. Water Lane is also within walking and cycling distance of retail facilities in the city centre and Cowick Street local centre. Exe Bridges Retail Park is a proposed residential-led site allocation in the Full Draft Exeter Plan, but this could involve the retention of retail uses on the site, for example at ground floor level.</p>
		<p>3. Grace Road playing field is not disused! It is well used by dog walkers, walkers, runners and Parkrun. It's a really nice open space that gives variety to the Riverside Valley Park. Just because it is not being used as a playing field does not</p>	<p>Comment noted. Grace Road Fields is no longer formally designated as a playing field as it is not fit for purpose.</p>

Name	Organisation	Comment	Response
		mean it is not being used and is not valuable in its current state.	
-	RSPB	<p>Rated as neutral because lack of information as to what some of the features will be. E.g., what is meant by the "A wildlife, nature and renewable energy opportunity?"</p> <p>and "Exeter's high line"? There is obviously great potential to deliver for some nature from this but the degree of value for biodiversity is dependent on the detail.</p>	<p>Comment noted. Grace Road Fields is regarded by the Council as a site that could be developed to provide energy infrastructure and/or to secure wildlife and nature enhancements.</p> <p>Comment noted. The High Line is defined in the SPD's glossary as a potential strategic active travel and flood access and egress route on the discussed railway line running through Marsh Barton. Code A13 has been amended to require the high-line to provide attractive and biodiverse open space and public realm. Code S03 has been amended to require GI Plans to show how development will link to existing GI including the high-line and requires contributions to enhance green infrastructure.</p>
-	-	Should take into account provision for sheltered retirement accommodation with warden facilities.	Comment noted. Code W06 specifically mentions the need in Exeter for homes for older people, including extra care housing (based on evidence of need provided by Devon County Council), and requires applicants to liaise and collaborate with relevant local authorities to explore how development at Water Lane can best support this need.
		Buildings should not be too high i.e., not over 3 storeys, as this will cut out light in the area. The density of accommodation appears to be very high for the area.	Comment noted. The Council considers that the building heights and densities proposed in the SPD respond to the site's context. Planning applications for development will be considered on a case-by-case basis and matters to be considered will include the setting of the Valley Park and Quay; daylight, ventilation and outlook; the setting, daylight and amenity of existing residents; and existing site characteristics. There are already number of existing buildings in the Water Lane area that are 3 storeys or more in height.

Name	Organisation	Comment	Response
		Does not seem to take into account any defined play areas and play facilities for children.	Comment noted. Code S02 requires proposals for residential development to provide a range of open space in accordance with the Fields In Trust benchmark guidelines, reflecting policy IC4 of the emerging Exeter Plan. These guidelines include, per 1000 people, the provision of 0.6 ha of amenity greenspace within 710 walking distance from home and 1.20 ha of playing pitches within 1.2km of home. Major development proposals may be required to include appropriate on-site open space, or off-site provision/a financial contribution where this is not appropriate. The SPD requires the provision of Green Streets and Lanes, which are car-free streets that can provide informal high-quality space for play.
		The lack of car parking space, for the number of properties is very inadequate, leading to residents parking on already congested streets and Marsh Barton.	Comment noted. Water Lane is planned as a low-car neighbourhood supported by active travel and public transport infrastructure. Therefore, car parking at Water Lane can be minimised in accordance with code A11. Measures will be taken to ensure that residents are not able to park on streets in neighbouring areas.
		The green area next to Marsh Barton Station should be used for child facilities i.e., football fields, basketball courts, children's play area with facilities. Parents could use the proposed cafe across the swing bridge to get a cup of tea, whilst the children play.	Comment noted. Poor ground conditions at Grace Road fields mean that it is no longer officially designated as a playing field by the Council and is unsuitable for use as recreational open space. However, code W12 for Clapperbrook Hub (adjacent to the station) lists a city-scale play space, outdoor activity centre and café as potentially suitable uses in this area.
		Toilet facilities do not seem to be taken into account for the public, when using this area i.e., cafe across the swing bridge, in the whole of the development on Water Lane i.e., cafes.	Comment noted. A new café is likely to include provision of toilets for customers. Proposals for new public toilets may come forwards under code W05.
-	-	Is a residential neighbourhood the logical location for a solar farm? Would it not be better to use the land for	Comment noted. The Council is satisfied that the solar farm is an appropriate use at Water Lane.

Name	Organisation	Comment	Response
		additional housing and locate the solar farm in a less sustainable location on land that is unsuitable for housing	
-	-	Walking along the canal next to a solar farm will be unpleasant and most intrusive to a walker and will not promote wellbeing.	Comment noted. The Council is satisfied that the solar farm is an appropriate use at Water Lane.
-	-	The key is to ensure there is as little car access to the area as possible. Housing should include lots of 'no car' living. All roofs should contain solar panels. It's an ideal spot to encourage use of public transport, cycling and walking. If you get it right, it could be a wonderful place to live. Good luck.	Supported noted. Code A11 requires allocated car parking provision to be minimised and consolidated to keep most areas of Water Lane predominantly free from cars and ensure sustainable modes are the most attractive choice. Code Q08 requires development to maximise opportunities for on-site renewable energy generation. The SPD seeks to encourage travel by public transport and active methods wherever possible.
-	-	The development is too dense with too much accommodation for too many people. There should be fewer buildings. The buildings themselves are too high. In keeping with the surrounds, the buildings should be maximum of 4 storeys high, and definitely not 9 storeys. I am vehemently against these proposals and the whole project is just too much.	Comment noted. The Council considers that the building heights and densities proposed in the SPD respond to the site's context. Planning applications for development will be considered on a case-by-case basis and matters to be considered will include the character and appearance of the surrounding area.
-	-	Looks pretty good, and well needed.	Support noted.
-	-	I feel that the area ear-marked for the solar farm could combine a small carpark with access to a land stage for individuals to launch kayaks and canoes and secure cargo bike storage for those who transport paddle boards and inflatable kayaks by bicycle.	Comment noted. The solar farm already exists and is an appropriate use in its current location. Code W12 for Clapperbrook Hub states that the existing small car park at Bromham's Farm could be replaced on land nearby to the west of the Canal (adjacent to the solar farm).
		I support a renewable energy/nature area this should ideally be community owned.	Support noted and comment noted. Community ownership/management of areas/infrastructure/buildings would be allowed for under code Q17 (which e.g., refers to

Name	Organisation	Comment	Response
			local government and maintenance of spaces and infrastructure, such as via a Community Interest Company).
-	-	This comment relates to the overall proposals. I am very concerned about the potential visual impact of the 6 and 9 storey buildings. This seems very high and out of keeping with the area. It also may adversely affect views out to the Haldon hills. As a resident of Rivermead Road opposite the development, I am also concerned that the 6 and 9 storey buildings will have an adverse impact from the views from my property, including loft room views across the river and beyond. I appreciated the need for higher density housing, but I think 3 or 4 storeys max would be more appropriate for the area and avoid visual impacts for the local community.	Comment noted. The Council considers that the building heights and densities proposed in the SPD respond to the site's context. Code M05 requires development proposals to map and analyse key views from the site and consider how best of retain existing key views and create new glimpse views. The accompanying Views Framework Plan show the view from St Leonards across to Haldon Belvedere and surrounding hills as a key view. However, the planning system has been established to work in the public interest and therefore it does not afford protection to specific private views.
-	Union4 Planning	The vision and the components of the Framework are supported	Support noted.
-	-	The southern zone of the Water Lane development plan must not include any building over four stories high. This is the current height of the most recently built flats south of the Welcome Inn. Any taller building would be visible from the valley park and Belle Isle park, particularly in winter when many of the trees lose their leaves. It would change the feel of the valley park to be overshadowed and overlooked by any visible housing blocks above this height. It would also interrupt the view of the hills between Exeter and Haldon Ridge and the view of Haldon ridge itself. The interruption of the view of the hills to the west of Exeter would not only affect people using the valley park but also from other parts of the city particularly from streets and houses along Topsham Road and between Topsham Road and the river.	Comment noted. The Council considers that the building heights and densities proposed in the SPD respond to the site's context. Planning applications for development will be considered on a case-by-case basis and matters to be considered will include the setting of the Valley Park and Quay; daylight, ventilation and outlook; the setting, daylight and amenity of existing residents; the retention of key views; and existing site characteristics.

Name	Organisation	Comment	Response
-	Exeter Community Centre Trust	Can't really understand the map!	Comment noted. The Development Framework has been amended to include a key to assist with legibility. It is to scale and includes key landmarks. On balance, it is considered that the addition of further text (e.g., street names) would make it overly complicated and therefore difficult to interpret.
-	-	Need to avoid oversupply of ground floor commercial units at ground floor level due to restriction of residential at GF in F3 Zone. Rents for these commercial units will be as new, so more accessible to certain businesses such as coffee shops vs offices. Possible maisonette layouts could be designed in, to allow living space including kitchen and dining rooms to GF, then sleeping area at first, in order to avoid oversupply of commercial.	Comment noted. Residential uses at ground floor level are not appropriate in flood zone 3. However, it may be appropriate to create raised residential ground floor levels as per code L22, outside the neighbourhood centre and local nodes. It is not anticipated that redevelopment at Water Lane will result in an oversupply of commercial uses.
-	-	Traffic concerns is a bi	The response is incomplete.
-	-	Accessibility is still a real concern as public transport is a farce at this stage in Exeter's development and shows no sign of improvement.	Comment noted. The Council will continue to work with stakeholders including Stagecoach to secure improved public transport provision in Exeter. The SPD seeks to ensure that Water Lane is designed and developed as a high-quality low car new neighbourhood which prioritises active travel and public transport use.
-	-	As previously stated, this project definitely has a lot of promising implications for the City, but my biggest concern will be the entertainment value added to the local area since this site includes the former tenpin bowling alley. So, what entertainment-based areas are there in this area? I would argue that green space is essential, and this project seems to honour that. However, what is there to do in the centre of Exeter for evening activities beyond eating and drinking? The population will need varieties of options for entertainment and venues such as bowling alleys, arcades and mini-golf venues have proven extremely successful in larger cities including London	Support noted and comment noted. The City Council will consider planning applications for new leisure uses in the City on their merits, against existing and emerging planning policies. Codes C01-05 of the SPD identify a range of potential cultural initiatives for the Water Lane area and the SPD seeks to enhance the site as a heritage and water-based destination.

Q6. Do you have any comments on the Memorable Places codes M01 - M06?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	<p>Memorable Places (p. 29) Heading: It is not readily recalled that the heading in the box (white text out of green) is a quotation from Liveable Exeter's Principles. Must it be? It would be better in this context if 'the River Exe' were replaced by 'the waterways' so it reads 'including the waterways, the City Centre ...' etc. Alternatively, it could read, 'the River Exe, the Canal, the City Centre ...' etc.</p>	<p>Comment noted. The heading quotes from for the Liveable Exeter Principles. The 'Future Vision for Water Lane' in the text below the heading reflects what this Principle means for Water Lane.</p>
		<p>A true waterside community (p. 29) Para 1, line 5 from 'daily life' onwards: Suggest rejigging the following sentences to align with the preceding ones and to reflect the continuing working nature of the Canal and Basin, e.g.: 'It's easy to access the waterside and its paths for relaxation and exercise. People can enjoy getting onto the water from new waterfront spaces on the Canal. The working waterway and harbour create interest by attracting more visiting and historic boats and new waterway related businesses. Maritime heritage and its importance to cultural life are celebrated through activities of the Heritage Harbour which embody an enterprising community spirit.'</p>	<p>Comment noted. The SPD has been amended to reflect most of these points. However, Heritage Harbour activities are unlikely to be the sole embodiment of Water Lane's enterprising community spirit and so this amendment has not been made.</p>
		<p>Sense of place (p.30) Para 3, lines 2 and 4: 'legibility' and 'legible' are jargon and add little meaning. Suggest deleting them. Line 3: these features aren't 'unique'.</p>	<p>Comment noted. The glossary has been amended to include a planning definition of 'legible/legibility' and "unique" has been deleted from the sentence.</p>
		<p>Contextual Analysis (p. 30 – paragraph on white)</p>	<p>Comment noted. The SPD has been amended to correct grammar. The wording substitution is not considered necessary and has not been made. The Heritage Harbour</p>

Name	Organisation	Comment	Response
		<p>Line 2: 'has shaped' should be 'have shaped'.</p> <p>M01 – Contextual analysis (text in box)</p> <p>Line 5: For 'the River and Canal' substitute, 'the Canal and River'.</p> <p>At the end add a new sentence: 'It is important also to demonstrate the area's relationship with the ambitions of Exeter Heritage Harbour' (or similar wording).</p>	<p>Route Map is not a planning document and is not adopted as Council policy, therefore code M01 has not been amended to refer to it. However, the area's Heritage Harbour status is now referenced in section 2.1 of the SPD and the Vision. In addition, code M02 will ensure that the local community and local stakeholders are engaged at an early stage in the development process, so that applicants can understand their aspirations and use these to inform their proposals.</p>
		<p>M03 – Character and cultural identity (p.31)</p> <p>Line 3: After 'maritime heritage', insert a comma, then: 'designation as a Heritage Harbour', so it reads 'area's industrial and maritime heritage, designation as a Heritage Harbour, and its current role and function' ... etc.</p> <p>Paragraph on white, p. 31:</p> <p>Line 1, after 'Canal' please insert 'and Basin'.</p> <p>Line 2: at the end of the line, after 'for' insert 'active', so it reads 'for active Exeter.'</p> <p>Line 3: between 'many' and 'uses', insert 'leisure and active'.</p> <p>Line 4: 'paddling' might not be correctly understood. Suggest 'canoeing', 'kayaking' or 'paddle boarding' instead.</p>	<p>Comment noted. The SPD has been amended to reflect most of these points. However, code M03 sufficiently reflects the need to consider the area's maritime heritage and the term 'paddling' encompasses a range of uses and has been retained.</p>
		<p>M04 – Relationship with the River and Canal (p. 31)</p> <p>Throughout: Reverse 'River and Canal' to read 'Canal and River'. In the context of the SPD, this is the correct emphasis.</p>	<p>Comment noted. Code M04 has been amended to require that the Canal's working functionality is respected and reference to the river has been removed from the 2nd bullet point. However, the proposed wording substitution is not considered necessary and the Heritage Harbour Route Map is not a planning document and is not adopted as Council</p>

Name	Organisation	Comment	Response
		<p>2nd bullet point: Suggest it reads, 'Providing new waterfront buildings and public spaces which place emphasis on the Canal while respecting the working functionality of the waterway and the objectives for its future as expressed in the Exeter Ship Canal and Heritage Harbour Route Map.'</p> <p>Suggest deleting the reference to the river in this bullet point.</p> <p>4th bullet point: At the end of the second sentence, add 'and the tow paths kept clear for operational management'.</p> <p>Also add a new sentence: 'Navigation of the Canal must not be impeded by any added bridge crossing.'</p> <p>We agree with the Civic Society's suggestion for an additional bullet point about preserving the Canal's 'close to nature' character.</p>	<p>policy. Code A27 is specific to proposals for a new Canal crossing, therefore the impact of a bridge upon navigation is not necessary in code M04. Code S13 is specific to the Canal's wildlife and biodiversity function and so reference is not necessary in code M04.</p>
		<p>M05 – Key views (p. 32) We support the Civic Society's observation that new glimpses should not be created as a result of new buildings blocking existing substantial views and believe this should be added to the document.</p>	<p>Comment noted. Code M05 has not been amended, because it is clear that development must retain existing key views.</p>
		<p>M06 – Historic and existing features (p. 33)</p> <p>2nd paragraph, line 2, 'it's' should be 'its'.</p> <p>Line 3, After 'setting' insert the words 'and water-related functionality'.</p>	<p>Comment noted. Grammatical corrections have been made to the SPD. Line three of code M06 relates to the Quay Climbing Centre, which does not have any water-related functionality.</p>

Name	Organisation	Comment	Response
-	-	M05-Key views - there are missing key views on the map for residents like me on the opposite side of the river out to surrounding hills and across the valley park. These should be added and considered in design stage.	Comment noted. Code M05 requires development to retain and consider the key views shown on the accompanying Views Framework Plan, but notes that there may be others to consider and that these should be agreed with the Council at an early stage, informed by a Landscape and Visual Impact Assessment.
-	Exeter Civic Society	<p>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?</p> <p>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.</p>	<p>Comment noted. Moving reference to the Quay is considered unnecessary. The Canal is mentioned in the first sentence of the Vision. The Vision has been amended to refer more generally to people being able to enjoy getting on to the water. Gabriel's Wharf/harbours are covered by the term "waterfront spaces on the Canal".</p> <p>Comment noted. No amended has been made as there is not considered to be a contradiction.</p>
		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.	Comment noted. It is appropriate to include contextual analysis as a coded requirement of the SPD.
		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.	Comment noted. This code is about ensuring that the local community and local stakeholders can be involved at an early stage in the development proposals. "Established" will not be added to the code, as some residents at Water may be relatively new.
		M03 Character and Cultural Identity. Whilst demonstrating an understanding of the maritime heritage of the area is	Comment noted. Water Lane's industrial heritage is reflected in features such as the Gas Works Office.

Name	Organisation	Comment	Response
		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.	
		<p>M04 Relationship with the River and Canal.</p> <p>The headline statement 'should improve the relationship with the canal & river'.</p> <p>2nd bullet – put canal before river.</p> <p>In the preceding statement the link 'for leisure' should be added to the end.</p> <p>Parking must also be retained for visitors.</p> <p>Add a further bullet point: Keeping the Canal a healthy and sustainable environment, by avoiding overshading 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.</p>	<p>Comment noted. The Canal/River wording substitution is not considered necessary. Adding "for leisure" would be misleading: the bullet points in code M04 also relate to other considerations, e.g., character. Adequate car parking will be retained to support local tourism and leisure use of the Canal and Quayside. Code S13 is specific to the Canal's wildlife and biodiversity function and so reference is not necessary in code M04.</p>
		<p>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.</p>	<p>Comment noted. Code M05 has not been amended, because it is clear that development must retain existing key views.</p>
		<p>M06 Historic and Existing Buildings. Nothing to disagree with here.</p>	<p>Support noted.</p>
-	Green Party	M02 Welcome this.	Support noted.

Name	Organisation	Comment	Response
		<p>M03 Character and cultural identity. There is significant cultural identity and character in the area which has been informed by the previous agricultural and maritime uses. The surrounding green space is important context which is not acknowledged here. This is greater than just the river and the canal so need to have reference here.</p> <p>They should also be reference made to the fact that there is Heritage Harbour Status.</p> <p>Part of this is the requirement for heavy boats and ships to be craned out of the canal at Gabriel's Wharf. This hardstanding must be retained in order for this to continue.</p>	<p>Comment noted. Water Lane's overriding character draws from its industrial and maritime heritage and so M03 has not been amended to refer to previous agricultural uses or the green space of the surrounding area. Codes including S03 will ensure that development at Water Lane is supported by new, and linked to existing, green infrastructure and contributions to enhance green infrastructure will be sought where necessary.</p> <p>Comment noted. M03 is considered to sufficiently reflects the need to consider the area's maritime heritage. However, the area's Heritage Harbour status is now referenced in section 2.1 of the SPD and the Vision.</p> <p>Comment noted. Code W11 has been amended to state that Gabriel's Wharf is required to safeguard a craning point and vehicle access for articulated lorries and a crane.</p>
		<p>M04 – Relationship with the River and Canal. This doesn't acknowledge that the River and Canal operate in the wider context of the surrounding green space and trees - not every property will be able to have a view of the river or canal. The relationship with the river and canal must acknowledge its relationship with nature and the fact that there are living creatures in the canal or use the canal. It is more than just a pretty feature to add value to the housing.</p>	<p>Comment noted. Code S13 is specific to the Canal's wildlife and biodiversity function and so reference is not necessary in code M04.</p>
		<p>M05 – Key views Development</p> <p>The views of from southwest Exeter are not considered.</p>	<p>Comment noted. Code M05 is clear that the key views shown in the Views Framework Plan are not exhaustive, but a starting point and that "there may be others to consider."</p>

Name	Organisation	Comment	Response
		There is no specific mention of the conservation areas which are important material considerations.	Comment noted. Consideration of the Conservation Areas and other heritage assets (e.g., Listed and Locally Listed Buildings) fall more closely under the remit of code M01, which has been amended accordingly.
		MO6 Historic and existing features. This should recognise the heritage harbour status and give reference to the plan and the work that is being undertaken to protect and promote the harbour and acknowledge the Heritage Harbour Route Map and explain how it is to uphold all of its provisions as it has been adopted by ECC-controlled ECQT.	Comment noted. The Heritage Harbour Route Map is not a planning document and is not adopted as Council policy. However, the area's Heritage Harbour status is now referenced in section 2.1 of the SPD and the Vision.
-	NHS Local Planning Authority Engagement	M02 – Local engagement The NHS welcomes early engagement from all applicants in respect of how health services can be provided for any new proposed developments.	Support noted.
-	Sport England	Memorable Places – Context and Identity a. M02 – Sport England are supportive of the need for applicants to engage with local community and local stakeholders. It is necessary that the SPD includes specific recommendations for engagement which includes effective and creative engagement techniques, discussion, co-design, and evidence gathering to ensure inclusive and equitable spaces and facilities can be designed and delivered. It is important that a wide range of community members are engaged with. Tools and techniques are available to help support successful engagement including Voice Opportunity which helps to engage with young people.	Support noted and comment noted. Code M02 has been amended to state that community engagement should be undertaken in accordance with best practice.
-	Historic England	M01 – Contextual analysis We welcome this code which requires applicants to analyse the context including the relationship with important historic and landscape features such as the Canal, City	Support noted.

Name	Organisation	Comment	Response
		<p>Centre, Cathedral, and green hills surrounding the city. This will need to complement the requirements placed on applicants by the NPPF (e.g., to describe the significance of heritage assets affected, including any contribution made by their setting).</p>	
		<p>M03 – Character and cultural identity In general, we support this code which requires applicants to demonstrate an understanding of the historic and cultural identity of the local area. However, we also think that it would be beneficial if this could also specifically require applicants to describe ‘designated and non-designated heritage assets including any archaeological potential, including those within the Water Lane area or who’s settings may be impacted by proposals’.</p>	<p>Support noted and comment noted. Heritage conservation policies in the adopted Exeter Local Plan First Review and the emerging Exeter Plan will ensure that development proposals have appropriate regard to designated and non-designated heritage assets including any archaeological potential.</p>
		<p>M04 – Relationship with the River and Canal We consider this code could help communities to re-engage with the canal and its heritage.</p>	<p>Support noted.</p>
		<p>M05 – Key views In general, we welcome this code, which requires proposals to map and analyse views. We suggest that the code should refer to views ‘to, from and across’ the site (e.g., from important viewpoints across Exeter and taking in the landscape setting), as the site itself may be incidental in these views and its development could reinforce or detract from their qualities. However, we are concerned that while the Views Framework Plan is helpful as a starting point, it is unclear how and why these particular views (which include views of and from heritage assets) have been identified and prioritised. Other important views that are currently missing or only vaguely identified are those from Colleton Crescent which take in the surrounding landscape; those from the historic Quay and its listed buildings, and any</p>	<p>Support noted and comment noted. Code M05 has been amended to refer to views “to, from and across” the site. M05 is clear that the key views shown in the Views Framework Plan are not exhaustive, but a starting point and that “there may be others to consider.”</p>

Name	Organisation	Comment	Response
		<p>significant views of the city from the surrounding landscape. We consider that a wider, strategic evidence base is needed for Exeter relating to important views and settings, which could inform both the Local Plan and SPD/Design Code. This would place the Council on the front foot both when forming its proposals for strategic sites, and when subsequently assessing detailed development proposals.</p> <p>M06 – Historic and existing features While we appreciate that this code sits within the context of wider (NPPF and local) heritage policy, it would nevertheless be helpful if the following statement could be broadened to highlight some other asset types e.g. ‘The setting of nearby historic buildings should be respected, along with other heritage assets such as monuments and conservation areas’.</p> <p>We are pleased to note the commitment within this code to retaining and repurposing buildings, features and materials that positively contribute to character, including the Gas Works former Social Club. It would be beneficial if M06 could also refer to the characterful local rubble stone wall that runs along the northeastern boundary of Water Lane close to the gasworks site. Retention of this feature would be beneficial.</p>	<p>Comment noted. Code M06 has been amended accordingly.</p> <p>Support noted and comment noted. The code states that “Proposals should aspire to retain other features that add character and identity”, which will enable to Council to seek retention of the stone wall along Water Lane.</p>
-	-	<p>These codes acceptable - but again unfortunately the specific proposals fail to live up to them. For example the codes above stress the importance of a number of views (e.g., the views west from the Canal and River) - yet latter Codes appear to allow 6 (and 12! story) buildings which would wreak such views.</p>	<p>Comment noted. Code L03 and the accompanying plan show ‘maximum’ building heights of between four and six storeys for the entire site, stating that alternative arrangements (as defined on the plan and legend) will only be acceptable based on robust justification. In such cases, the buildings must be of exceptional quality.</p>

Name	Organisation	Comment	Response
-	-	M03 and M04 particularly important to retain the area's character and cultural identity and improve access and connection with the River and Canal.	Support noted.
-	-	M05 I would like to see all the views listed (to retain, to consider, and indicative wider views) given high priority in the SPD. Part of the vision is for the development to be better connected to other areas of Exeter. Being able to see key landmarks and views would achieve this aim.	Comment noted. M05 requires that the key views shown in the Views Framework Plan (which are not exhaustive, as the code states) must be retained and considered.
-	-	M06 It's good to see that historic buildings will be retained. The development should be precisely that, a development of what is here, rather than a complete replacement.	Support noted.
-	RSPB	This SPD places a value on the existing canal biodiversity and what can be provided within the development but retaining and creating nature-rich spaces for benefit of biodiversity and people requires early planning, careful design and implementation and ongoing investment in management. Also, the Water Lane development will lead to increase in people using the canal and adjacent habitats, so the impact of increased recreational use on wildlife needs to be appropriately mitigated/compensated for - including via greater ongoing investment re habitat management and people management to avoid damaging impacts.	Comment noted. Code S13 specifically seeks to protect and maximise the Canal's wildlife and biodiversity function.
-	-	M01 – M04 – fully support these statements.	Support noted.
-	-	M05 – very pleased that views of, to and from the site are stated as important.	Support noted.
-	-	M06 – very pleased that the Gas Works former Social Club building must be retained.	Support noted.
-	-	M06 - I am pleased to learn that the former Gas Works Social Club building is to be retained.	Support noted.

Name	Organisation	Comment	Response
-	-	MO5 comments: I think that there needs to be some more 'Indicative wider views to consider' from the residential area alongside Topsham Road (i.e., Salmon Pool Lane, Old Abbey Court, Rivermead Road). We have to have this explicitly mentioned, otherwise it will be exploited. MO5 - I think there should be further triangles of "Indicative Wider Views to Consider" from further South (i.e., from Abbeville Close (EX2 4SJ) and the Salmonpool Lane end of Rivermead Road and Old Abbey Court (EX2 4SW)	Comment noted. MO5 is clear that the key views shown in the Views Framework Plan are not exhaustive, but a starting point and that "there may be others to consider."
-	Union4 Planning	Whilst it is agreed that key views should be considered and protected, it is also the case that any new development within this area is going to create a new skyline and have a degree of impact on views. The key will be protecting the main views and also creating new views through and over the area, through the provision of high-quality buildings, sight lines, vistas and glimpsed views.	Support noted.
-	-	MO6 - it is vital to keep important existing buildings such as the old gas works club.	Support noted.
-	-	MO5 the serenity and quiet river area feel must be preserved. And views are crucial in allowing this.	Comment noted. MO5 requires that the key views shown in the Views Framework Plan (which are not exhaustive, as the code states) must be retained and considered.

Q8. Do you have any comments on the Outstanding Quality code Q01?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	Exeter's flagship development (p. 34) Final paragraph line 3: 'and interest groups' should be inserted after 'local community' to acknowledge the contributions of groups that are not 'local'.	Comment noted. The SPD has been amended accordingly.

Name	Organisation	Comment	Response
		<p>Global city qualities – Overarching opportunities and objectives (p. 35 – text on white)</p> <p>Para 2, line 8: After ‘and businesses’, insert a comma, then ‘including the advantages of its historically important working waterway, ...’ etc. A reference such as this is worth making given the coverage of the SPD is the Water Lane area.</p> <p>Q01 – Global city qualities (p.35)</p> <p>Para 2: Suggest the following tweak – after ‘outstanding gateway’ amend the text to read, ‘to the city’s waterways and Riverside Valley Park and enhance the area’s regional importance as a destination for new low carbon, water-related commercial initiatives and active leisure opportunities.’ N.B. Well-being is also a global city quality.</p>	<p>Comment noted. The SPD has not been amended because the paragraph is talking about the city as a whole.</p> <p>Comment noted. The SPD has not been amended because the existing text is considered to be appropriate.</p>
-	Exeter Civic Society	<p>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.</p> <p>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.</p> <p>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</p>	<p>Comment noted. It is considered that climate issues are appropriately placed in the SPD and that the first paragraph of the Vision Statement is also appropriate. Interest groups are covered by the phrase “the local community”.</p> <p>Comment noted. The existing references are considered to be appropriate.</p> <p>Comment noted. The final paragraph of code Q01 and the preceding text are considered to be appropriate. The University is included in the fourth bullet point as there may</p>

Name	Organisation	Comment	Response
		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.	be opportunities for developer collaboration in relation to environmental intelligence and climate science.
-	Green Party	Q01. Please can all the references to strength of a global city and all that sort of terminology be removed. There is nothing wrong with being a great small city. The City can be confident about our identity without claiming to be grand and global! If we are serious about placemaking it ought to be rooted in the history and qualities that have built Exeter and the essence of what people love about the city, these will be destroyed by thinking that we are a global city when we are not and have no need to be and it is not clear that people recognise Exeter's distinctiveness as a global city. Whilst we can be globally connected, if we do not celebrate what is distinctive about Exeter then we just become a clone town and have no qualities at all. The heading should be about building on the best of Exeter.	Comment noted. The term 'global city' has been used to reflect Exeter's high aspirations in relation to (e.g.) design and low carbon living.
-	-	Q01 – this is a hugely ambitious plan and Exeter City Council should be congratulated for its far thinking and challenging vision. Should we be careful though that in making such proposals we run the danger of making it too difficult for any developer to even consider choosing Exeter for their next project?	Support noted and comment noted. In providing a Development Framework and Design Code, the SPD is intended to provide guidance and clarity for developers and thereby assist in the development process.
-	-	Sounds fab. Just need to ensure the rest of the proposal meets this ambition.	Support noted.

Q10. Do you have any comments on the Outstanding Quality codes Q02 - Q11?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	<p>Energy Hierarchy – Example ‘Pathway to New Zero Carbon’ in Operation (p. 41) I may be out of my depth, but does this graph mean anything? It looks like an illustration of a self-fulfilling prophecy (or wishful thinking).</p> <p>Q07 – SMART grid and infrastructure (p. 43) 3rd bullet point refers to the provision of electric charging infrastructure for bicycles and scooters. This traffic can attain fast speeds and is permitted on footways and footpaths. It should be included that precautions will be necessary to protect, or segregate, pedestrians on the Canal’s tow paths and other waterside walkways.</p> <p>Water strategy (p. 45) The text on white that accompanies Q10 should mention that water should not generally be extracted from the Canal for recycling or non-potable uses even if returned after cleaning.</p>	<p>Comment noted. The graph shows an example of the annual carbon dioxide emissions that may be produced where the developer is building to Building Regulations Part L or is instead applying more exacting standards in order to achieve the principles of ‘Lean’, ‘Clean’ and ‘Green’. The supporting text has been amended to explain that it relates to development proposals across all scales.</p> <p>Comment noted. Code A02 has been amended to clarify that the design of cycle routes will need to accord with Local Transport Note 1/20 guidance. Code A28 requires landowners to collaborate to achieve a widening of the Canal towpath so that it can accommodate cycle use alongside an increase in pedestrian use.</p> <p>Comment noted. The amendment is not considered necessary. Water will be provided to Water Lane residents and businesses by South West Water, from the reservoir system.</p>
-	-	<p>Q08-Renewable energy. Renewable generation should be mandated and a level set. For example, Passivhaus Premier mandates buildings should generate 4 times the energy they consume. That might be extreme and not commercially viable, but a figure over 100% of energy consumed should be included to help decarbonisation of energy in Exeter.</p>	<p>Comment noted. The SPD must amplify adopted planning policy in the Exeter Local Plan First Review and Exeter Core Strategy and also cannot set requirements for building standards that exceed those set by the Government. Within these constraints, the codes in section 4.2 seek to ensure that development minimises energy use and carbon emissions.</p>
-	Exeter Civic Society	<p>Q02 Zero Carbon. Whilst this code and the preceding text about resources are good ambitions, we do not consider</p>	<p>Comment noted. It is considered that codes concerning the use of resources are appropriately placed in this section of</p>

Name	Organisation	Comment	Response
		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?	the SPD. The existing references and examples are also considered to be appropriate.
		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!	Comment noted. Code M02 requires applicants to engage with the local community to understand their aspirations for the area and set out how their development proposals have been informed by these aspirations.
		Q04 Energy Hierarchy. We do not disagree with this and the following text but is it in the right chapter?	Comment noted. It is considered that this code is appropriately placed in the SPD.
		Q05 Passive and climate responsive design. We wonder if the last bullet point should be the first.	Comment noted. Changing the order of the bullet points is not considered necessary.
		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.	Comment noted. Code Q06 does not refer specifically to the Energy from Waste Plant. However, Devon County Council have recommended that the SPD requires applicants to explore the option to use heat from the facility as a source of energy. The preceding text to code Q06 will be amended accordingly.
		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?	Comment noted. The bullet point would not prevent a statutory body or the University of Exeter from also taking on this role.
		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.	Comment noted. The Council's Environmental Health Team has questioned the value of a network of sensors; therefore this requirement has been deleted from the SPD.
		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	Comment noted. Planning applications for residential development will be expected to accord with the policy requirements for provision of bins set out in the Council's

Name	Organisation	Comment	Response
		guidance? (We have seen a few recent proposals where the number of storage bins is below the recommended level).	Residential Design Guide SPD. It is not necessary to repeat those requirements in the Water Lane SPD.
-	Haven Banks Residents' Group	Q10, We feel there is opportunity in this code to encourage (or mandate) the use of grey water solutions.	Comment noted. The use of grey water solutions is not specifically mentioned in the SPD but is an implicit part of the water hierarchy described in code Q10.
-	Green Party	<p>Q02 Zero carbon: The policy makes reference to Exeter's ambition to be net zero by 2030 This needs to be backed up by reference to the law requiring development to be net zero by 2050. Development proposals are to be 'encourage[d]' but this is way too weak. They should be required to demonstrate how they will achieve net zero. The whole life carbon assessment is a really welcome move, and this should be a mandatory measure included in the Local Plan as well.</p> <p>In terms of zero carbon, how is the minimal disturbance of soil going to be reconciled with the fact that the brownfield land is going to be contaminated? There needs to be some sort of discussion about what sort of remediation methods are going to be adopted that are appropriate to achieve zero carbon goals.</p>	<p>Comment noted. Reference to the legal requirement for development to be net zero by 2050 is not necessary in the SPD. The SPD must amplify adopted planning policy in the Exeter Local Plan First Review and Exeter Core Strategy and also cannot set requirements for building standards that exceed those set by the Government. Within these constraints, the codes in section 4.2 of the SPD go as far as possible to ensure that development minimises energy use and carbon emissions.</p> <p>Comment noted. It is highly likely that decontamination of some soils at Water Lane will be necessary. Developers will be expected to minimise soil disturbance during the decontamination process.</p>
		Q03 The community engagement section is very weak and needs to include not only community engagement in the design stage but actually in the ongoing stage once the development is complete and lived in. This should include measures around community ownership and community assets.	Comment noted. Code M02 requires applicants to engage with the local community to understand their aspirations for the area and set out how their development proposals have been informed by these aspirations. Code Q17 allows for ownership and management of infrastructure and areas (etc.) by the community.
		<p>Q04 Energy Hierarchy</p> <p>1.Lean: use less energy is a welcome principle but unless there are appropriate standards to measure and demonstrate how this is going to be achieved, then this is open to future debate which is not helpful.</p>	Support noted and comment noted. The code is as exacting and precise as it can be within the remit of existing national and local adopted planning policy. A local energy network sourced from the energy from waste facility is one option that could help to deliver net zero development at Water

Name	Organisation	Comment	Response
		<p>2. Clean The clean element should incorporate connection to local decentralised energy networks. These should be from low energy sources such as ground source heat pumps, or renewables (including wind as turbines are changing their design). A connection to the incinerator is not a low carbon emission heat source. Notwithstanding its role as an alternative to landfill, the Marsh Barton incinerator is the highest single emitter of CO2 in the city and cannot be considered as a low carbon energy source. On page 41, the example pathway to NetZero is a good idea, but it doesn't say what the annual carbon dioxide emissions in tons per year is for... one house a flat or whole development? It might work better as a pie chart to show the proportion and the building regulations Part L compliance as the whole that it needs to operate within. There is already some inconsistency between this document and the local plan document because I understand that the Local Plan which is using Part L from a 2013 baseline. It is unclear why the latter is beneficial.</p>	<p>Lane. However, there may be other options. The supporting text to the Example Pathway graph has been amended to clarify that it is applicable to all scales of development.</p>
		<p>Q05 Passive and climate response design. This doesn't reference the use of the green infrastructure as part of the design and the solution for climate design. The impact of the design itself on the green infrastructure itself needs to be considered. For example, high levels of wind will prevent plants from growing, so unless the responsive design incorporates the impact on nature this maybe be detrimental.</p>	<p>Comment noted. The 5th bullet point of code Q05 has been amended to refer to green infrastructure and planting. Design considerations for green infrastructure, planting etc, are covered in codes contained in chapter 4.8 of the SPD. For example, code S08 requires planting to be resilient to an urban environment and future climate change.</p>
		<p>Q06 See points elsewhere referencing the impact of the incinerator. It is important that succession to the incinerator is considered. Hyper-local decentralised energy networks should be considered using renewable sources and it should be spelt out in the document.</p>	<p>Comment noted. The provision of hyper-local decentralised energy networks at Water Lane can be considered under the existing wording of code Q06. Policy CC3 of the emerging Exeter Plan also proposes the creation of local energy networks where these are shown to be feasible and viable.</p>

Name	Organisation	Comment	Response
		Q07 All welcome ideas. However, development proposal 'should explore' is weak language.	Support noted and comment noted. The code is as exacting and precise as it can be within the remit of existing national and local adopted planning policy
		Q10 Welcome a target of water use per head. The provision of sewage disposal needs to be incorporated into the design code of water hierarchy because it cannot be released into the river or the canal. Sewage disposal and infrastructure may need to be added to the infrastructure list.	Support noted and comment noted. The treatment (etc.) of sewage is not specifically mentioned in code Q10 but is an implicit part of the water hierarchy that it describes. The Infrastructure Delivery Plan for the Exeter Plan will identify the need for any new sewage infrastructure arising from new development, including at Water Lane.
		Q11 The collection, treatment and disposal of food waste on the development side for its reuse on site / energy. Will sewage or food waste power the bio-gas plant?	Comment noted. The treatment (etc.) of food waste is not specifically mentioned in the SPD but is an implicit part of the materials and waste hierarchy described in code Q11. The bio-gas plant already exists and the means by which it is powered is not a matter for the SPD.
-	Sport England	<p>Outstanding Quality – (Linked to AD3 principles 9 – Maintaining high quality flexible spaces and 10 – Activating Spaces)</p> <p>a. Consider how the spaces within water lane can be used flexibly to accommodate changing needs in the area.</p> <p>b. As part of the creation of the space, it is important to consider how targeted groups are considered when designing the space. What are their needs, how will they use the space?</p> <p>c. Q.03 – ensure that community engagement is targeted and aligns with the recommendations in principle 1 of Active Design around creating Activity for All (pg. 12 of AD3)</p> <p>d. Q05 – consider including a sentence to show how designs can also encourage physical activity and health and wellbeing.</p>	<p>Comment noted. The SPD addresses the need to allow for flexible use of spaces in several ways. For example, the codes for the three Water Spaces (W10, W11 and W12) indicate a range of potential uses for the areas rather than specifying requirements and code S02 requires all new open space to be multi-functional. Code S02 also requires all new open space to be designed to be inclusive and accessible for all. Codes M02 and Q03 have been amended to better ensure that the local community is engaged from an early stage in the development process. This will help to ensure that all community groups are considered in the design of spaces. Code Q05 is about passive and climate responsive design rather than physical activity and health and well-being, topics which more closely relate to codes in section 4.6.</p>
-	Devon Wildlife Trust	<p>Q05 – Passive and climate responsive design</p> <p>We would urge the Council to demand higher standards</p>	<p>Comment noted. The SPD can only amplify existing planning policy and cannot demand higher standards than required</p>

Name	Organisation	Comment	Response
		with regard to climate responsive design. Solar panels should be a requirement for every roof space within the Water Lane development.	existing policy. Solar panels may not be appropriate for every roof space at Water Lane, but code Q05 does require solar access to be maximised.
-	RSPB	Q02, Q05 - please maximise use of vegetation including trees, green roofs and living walls for shading/insulation.	Comment noted. Code Q02 refers to the provision on green infrastructure, biodiversity net gain and landscape-led schemes to support Exeter's net zero ambitions. Code Q05 has been amended to refer to the role of green infrastructure and planting in responding to predicted climate change.
		Q10 - water hierarchy - need to ensure that any polluted surface water is not discharged directly into the canal.	Comment noted. Codes including Q10 and S06 seek to ensure the sustainable treatment of waste and surface water at Water Lane.
-	-	Q02 & Q03– all very laudable ambitions	Support noted.
		Q04 – what considerations need to be made for a back-up plan when the power fails?	Code Q04 sets out an energy hierarchy and it is not considered necessary to refer to a back-up plan.
		Q08 – ‘integrated into buildings in the first instance’ – at last! Surely this is something that all new build should be required to do.	Support noted.
		Q09 – Good, creation of power can be extremely noisy, constant low-level buzzing etc is detrimental to residents' wellbeing.	Support noted.
		Q10 – rainwater harvesting is good but why not recycle grey waste for flushing toilets etc. Discourage the practice of providing of more toilets than people in each dwelling.	Support noted and comment noted. The use of grey water solutions is not specifically mentioned in the SPD but is an implicit part of the water hierarchy described in code Q10. Code Q10 seeks to ensure that water demand is minimised as a priority.

Q12. Do you have any comments on the Outstanding Quality codes Q12 - Q15?

Name	Organisation	Comment	Response
-		Q13 – Resilience (p. 48) 5th bullet point: At the end after ‘public transport’ add,	Comment noted. Code Q13 has been amended accordingly.

Name	Organisation	Comment	Response
	Friends of Exeter Ship Canal	<p>'and water transport on the Canal.' This is important in an SPD for the development of an area adjacent to and 'defined by' the water.</p> <p>Q15 – Flood risk (p. 49) Has the flood risk from the impact on the Canal of raised sea levels over the lifetime of the development been considered? We think it should be referenced.</p>	<p>Comment noted. The Environment Agency's flood risk model takes account of all sources of flooding, therefore it is not necessary to specifically refer to the Canal in code Q15.</p>
-	-	Q13-e.g., p48 mentions SUDs "wherever possible". Given the flood impacts of this development, this should probably be stronger.	Comment noted. Code Q13 has been amended accordingly.
-	Exeter Civic Society	<p>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.</p> <p>Q13 Resilience. OK</p> <p>Q14 Building performance standards. OK. Is the third bullet point enforceable, if not, reword or remove.</p> <p>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.</p>	<p>Comment noted. The third bullet point is not legally binding, hence the requirement the development proposals are "encouraged to demonstrate". An active link has not been provided to the UKGBC's Net Zero Carbon Buildings Framework as this affects the accessibility of the SPD.</p> <p>Support noted.</p> <p>Comment noted. The third bullet point is considered to be worded appropriately.</p> <p>Comment noted. A Strategic Flood Risk Assessment Level 2 incorporating an Access and Egress Study has been commissioned and the results will inform planning proposals that come forwards at Water Lane. Text on page 145 explains that the Environment Agency is updating its flood map. The Environment Agency have been a key stakeholder in preparing the SPD.</p>
-	Haven Banks Residents' Group	Q14 The 78% carbon dioxide emissions reduction should be higher and more challenging.	Comment noted. The SPD must amplify adopted planning policy in the Exeter Local Plan First Review and Exeter Core Strategy and also cannot set requirements for building standards that exceed those set by the Government. Within these constraints, the codes in section 4.2 of the SPD go as

Name	Organisation	Comment	Response
			far as possible to ensure that development minimises energy use and carbon emissions.
		Q15 The first piece of infrastructure to be built must be the Flood Escape Bridge over the railway line, before any other building work is started.	Comment noted. A Strategic Flood Risk Assessment Level 2 incorporating an Access and Egress Study has been commissioned and the results will inform planning proposals that come forwards at Water Lane.
		Q16 Like public access and no gated development	Support noted.
-	Green Party	Q12. Encouraged should be changed to 'shall'. If the embodied carbon can't be minimised, is there any requirement to offset this carbon use?	Comment noted. The SPD must amplify adopted planning policy in the Exeter Local Plan First Review and Exeter Core Strategy and also cannot set requirements for building standards that exceed those set by the Government. Within these constraints, the codes in section 4.2 of the SPD go as far as possible to ensure that development minimises energy use and carbon emissions.
		Q13 Should the ability to have buildings change their use over time be included? For example, being adaptable for lifestyles and lifetime standards being incorporated into this section? "Integrate renewable technologies and SUDS wherever possible" Sounds like it's optional rather than at every opportunity and given that SUDS is legal requirement strengthening and being more specific would be helpful here.	Comment noted. Code Q13 is about climate resilience rather than lifestyle resilience. The fourth bullet point has been amended to require development to integrate renewable technologies and SUDs at every opportunity.
		Q14 The measurement of 70% carbon dioxide emissions reduction based on the 2013 building regulations does not achieve net zero as set out elsewhere, and contradicts the points earlier on Part L. No evidence base is provided to demonstrate this archive Net Zero. Meeting national target improvements for energy performance certificates will not meet the targets for net zero.	Comment noted. The SPD must amplify adopted planning policy in the Exeter Local Plan First Review and Exeter Core Strategy and also cannot set requirements for building standards that exceed those set by the Government. Within these constraints, the codes in section 4.2 of the SPD go as far as possible to ensure that development minimises energy use and carbon emissions.

Name	Organisation	Comment	Response
		Q15 Flooding must consider surface water and water that may come up through drains etc. Not just from the river or canal. The Haven Banks area is already at flood risk because of sub-surface water.	Comment noted. The introductory text to code Q15 has been amended to refer to surface water flood risk. The term 'flood' risk in code Q15 is catch-all and therefore covers all sources of flooding.
-	-	Q15: It would be very helpful if this section could include the current EA assessment of flood risk - both river and pluvial - so that developers and existing and potential residents can assess any proposals in this context.	Comment noted. A Strategic Flood Risk Assessment Level 2 incorporating an Access and Egress Study has been commissioned and the results will inform planning proposals that come forwards at Water Lane. Text on page 145 explains that the Environment Agency is updating its flood map. The Environment Agency have been a key stakeholder in preparing the SPD.
-	-	Q12 – good, reusing existing must be encouraged even if it is more difficult, surely, it's greener.	Support noted.
		Q13 – what is the development lifetime? Some existing properties in the area are around 100 years old – will newbuilds ever last that long?	Comment noted. Development lifetimes are likely to vary.
		Q14 – good to minimize overheating, people should get used to putting a jumper on in winter and opening a window in summer as used to be the case.	Support noted.
		Q15 – flooding doesn't just come from the river, what about adequate sewerage requirements?	Comment noted. The Council will continue to work with South West Water to ensure the provision of adequate sewage infrastructure Water Lane.
-	-	Flood risk is a massive thing to consider here. The impacts could be very disruptive and expensive	Comment noted. A Strategic Flood Risk Assessment Level 2 incorporating an Access and Egress Study has been commissioned and the results will inform planning proposals that come forwards at Water Lane. The need to consider flood risk is reflected in codes Q02, Q13, Q15, Q17, W04, L24, L25, L27, A13, A15, A24, S02, S04 and S06

Q14. Do you have any comments on the Outstanding Quality codes Q16 - Q17?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	Q17 – Development coordination (p. 50) We suggest this should be strengthened to state that Water Lane development must not impede the requirements of existing infrastructure where this is shared and should connect and integrate with sites in current use, such as the Canal Basin and its quays and buildings.	Comment noted. Code Q17 has been updated accordingly.
-	Exeter Civic Society	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.	Comment noted. The Council will have oversight of all matters covered in code Q17, as reflected in the statement “Development proposals must demonstrate that...”. Comment noted. It is considered that these codes are placed appropriately within the SPD.
-	Local residents from the Haven Banks area	Q16 Like - public access and no gated development	Support noted.
-	Green Party	Q16 There must be clear mechanisms in place for residents to be able to have a role in Stewardship and governance. So, the paragraph in this policy is welcome.	Support noted.

Name	Organisation	Comment	Response
		Q17 This policy should include a requirement for records to be kept about the construction methods and materials so that this can be referred to for future alterations and removal/demolition. Elsewhere there is a policy in relation the life cycle of the development and documenting construction, so that it can be dismantled in a way which allows reuse or recycling (before landfill), would be appropriate.	Comment noted. Recording these details would be an implicit part of the Whole Life Carbon assessment set out in code Q02, therefore code Q17 has not been amended.
-	NHS Local Planning Authority Engagement	Q17 – Development coordination Whilst it is unlikely that there will be any specific healthcare infrastructure required within Water Lane there will need to be a co-ordinated and supported approach to increasing the existing healthcare facilities that would support the residents.	Comment noted. The City Council will continue to work with NHS providers to identify and plan for the health care needs arising from new development in Exeter.
-	Sport England	<p>e.Q16 – Sport England fully support that the principle around stewardship and governance is included in the application process. This is important to ensure that all developments are monitored to understand their effectiveness and efficiency. Encourage a well thought through Monitoring and Evaluation plan. This should be granular and consider different groups. The monitoring will establish whether a space is operating as it was designed to do so and changes can be made if necessary. (See section 9.2 of AD3).</p> <p>f. Under the last theme of AD3, Creating and Maintaining Activity, there is a lot to learn to support these principles. This theme emphasises the importance of securing the management and maintenance at an early stage with funding secured as well.</p> <p>g. Investment should also be noted to encourage spaces built within Water Lane to be activated from an early stage</p>	<p>Support noted and comment noted. The City Council will require appropriate monitoring of development.</p> <p>Comment noted. In agreeing alternative stewardship arrangements, the City Council and other stakeholders will need to be satisfied that these are properly funded and in place from the outset.</p> <p>Comment noted. Phasing (including in relation to key infrastructure) work by the Council and stakeholders to support the successful delivery of development and building</p>

Name	Organisation	Comment	Response
		to encourage behaviour change and the use of the space (see section 10.1 of AD3).	of a community at Water Lane is ongoing. The supporting text to code Q16 notes the importance of early delivery of infrastructure such as active travel connections, community facilities and open space to support the new neighbourhood.
-	-	Q16 – it is vital that good management continues after the construction stage. Good that gated communities are not acceptable, it is a shame that the direct pedestrian access to Piazza Terracina and the basin viewed from Cricklepit Bridge is not permitted through Waterside.	Code Q16 seeks to ensure that good management is in place for the long term.
		Q17 – good aspirations.	Support noted.

Q16. Do you have any comments on the Welcoming Neighbourhoods codes W01-W09?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	<p>W01 -- General land use and activity (p.52)</p> <p>1st bullet point, line 2: After 'demographic' we suggest adding 'and a new Canalside neighbourhood for interest as well as activity.' This keeps the waterside community concept in mind.</p> <p>'Water-related uses' (line 6) should be emphasised by coming earlier in the list, which otherwise could apply to just about any new neighbourhood. 'Class E' use (line 4) needs definition within the SPD, e.g., what restrictions does it impose on commercial water related uses such as boat maintenance, restoration, and repair? Elements in the list are not sufficiently clear, for example 'space for the charitable sector' and 'heritage centre'.</p> <p>3rd, 4th, and 5th bullet points: 'Land use' proposals should</p>	Comment noted. The changes suggested to the first bullet point would add unnecessarily to the length of W01. The 3 rd bullet point has been amended to refer to existing functions/uses.

Name	Organisation	Comment	Response
		<p>coordinate with and supplement existing functions as well as provide new ones. As well as avoiding unnecessary duplication and making good deficiencies, they should recognise shared needs in order to achieve cohesive and comprehensive development. It is important they recognise that the Canal extends in both directions beyond the development site and that what happens in the development area will have an impact on the ability of the Canal and Basin to function as a whole.</p>	
		<p>W02 – Land use plan (p. 53) Please don't name a prime water space 'Gas Works Place'.</p> <p>On the West side of the Canal Basin, a substantial area of the harbour is shown as 'residential led development'. Its present use by the Exe Water Sports Association and for boat lay-up and repair has disappeared. 'Residential led' is not an appropriate designation for such a large portion of the remaining harbour space at the Basin. It is already squeezed by non-water related uses of major waterfront buildings putting pressure on maritime use of the quays within the Exeter Heritage Harbour designation. This does not imply that homes cannot or should not be provided within water related development but it is a question of emphasis and overall balance if the Basin is to remain a working waterfront zone in more than name only.</p> <p>A dedicated craning point at the Basin's West Quay should not squeeze the remaining space for boat repairs, storage and mooring for visiting craft because of the loss of craning</p>	<p>Comment noted. The title Gas Works Place is considered to be appropriate given the historic use of this part of Water Lane.</p> <p>Comment noted. Code W02 has been amended to show 62 Haven Road as a site for residential-led development, with an opportunity for water-related uses fronting the canal basin (e.g., at ground level).</p> <p>Comment noted. Codes W02 and W11 have been amended to safeguard space for a craning point to lift vessels from the</p>

Name	Organisation	Comment	Response
		<p>facility at Gabriel's Wharf resulting from the Water Lane development. (See pp. 7 and 8 of this document, W05 and W07, below).</p> <p>No public toilets are indicated on the West side of the Basin, where they are badly needed.</p> <p>The above and other points relating to land use are detailed in following sections but the plan itself will need amending.</p> <p>Neighbourhood Centre (p. 55) The caption beneath the illustration reads as if there will be only one Neighbourhood Centre and local green space in Water Lane, which is contradicted by the land use plan which shows five such areas albeit close by. If there is more than one neighbourhood centre, the caption should read: 'Neighbourhood Centres and local green spaces provide well-connected, mixed-use centres for Water Lane.'</p> <p>Water related uses (p. 57 – section on white) We welcome this section but what will happen to the text when the Design Code is shortened as we assume it will be in the final SPD?</p> <p>The following amendments are suggested to amplify some of the suggestions made:</p> <ul style="list-style-type: none"> Line 2: At the start of the second sentence, before 'Water related uses' suggest adding, 'Commercial, 	<p>water and associated storage/vehicle turning space at Gabriel's Wharf.</p> <p>Comment noted. Proposals for new public toilets may come forwards under code W05.</p> <p>Comment noted. There will be one neighbourhood centre with associated local green space at Water Lane. This is shown on the land use plan (with the neighbourhood centre being traversed by routeways).</p> <p>Supported noted and comment noted. An amended version of the text has been retained (now on page 55).</p> <p>Comment noted. Line 2 has been amended to refer to commercial, heritage and active leisure water-related activities. All other suggested amendments have been made.</p>

Name	Organisation	Comment	Response
		<p>heritage and active leisure’ so it reads ‘Commercial, heritage and active leisure water related uses are essential ...’</p> <ul style="list-style-type: none"> • Line 6: For ‘interventions’ suggest ‘improvements’. • First bullet point: Suggest tweaking to read, ‘New slipways that enable small and medium vessels, as well as those over 20 tonnes, to get in and out of the water.’ • 2nd bullet point: Suggest adding a comma, then ‘weed-free’ between ‘Clean’ and ‘water’. • 4th bullet point: Suggest tweaking, ‘A water-related hub with spaces for boat building and maintenance, and community projects.’ • 6th bullet point: Suggest adding a comma after ‘facilities’, followed by ‘public toilets and services for visiting and moored boats.’ • 7th bullet point: For ‘that bring’ read ‘who bring’. • 8th bullet point: After ‘the Quay’ add ‘and the Canal Basin, and to and from other waterside destinations.’ – so it reads ‘Marsh Barton Station, the Quay and the Canal Basin, and to and from other waterside destinations.’ • We suggest deleting the final sentence and substituting, ‘The Exeter Ship Canal and Heritage Harbour Route Map has been produced to assist bringing these and other features forward in future.’ 	
		<p>W05 – Water related uses (p. 57 – text in pink box) Items from the adjoining text on white, as amended above, should be included in the pink box if they are cut when the</p>	<p>Comment noted. The items listed on page 59 have not been added to code W05, because the Heritage Harbour Route Map is not adopted City Council policy. However, the</p>

Name	Organisation	Comment	Response
		<p>overall document is shortened.</p> <p>Para 2, line 2: After 'suitable for' suggest inserting 'commercial, heritage and active leisure' before 'water-related uses'.</p> <p>Para 3, lines 1-2: Amend to read, 'with users of the Canal and River, Exeter City Council and the Port Authority ...'</p> <p>Lines 6-7: Correct names of the organisations are River and Canal User Group and Exe Water Sports Association.</p> <p>Para 4, line 3: After 'access to the Canal for' suggest deleting 'water related' and inserting 'working and active leisure' so it reads: 'ensure good access to the Canal for working and active leisure uses and ensure the use ...' etc.</p> <p>Para 5, line 2: For 'larger vessels' substitute 'vessels over 20 tonnes'.</p> <p>Para 5: The Friends have argued strongly against a dedicated craning point at the Basin's West Quay in these circumstances on the grounds that it will diminish further the tight space at the Basin for boat-related uses. A suitable craning facility should be retained at Gabriel's Wharf. This view was also the conclusion of the report by consultants Greenwood Projects, 'An Assessment of Current Planning Proposals relating to the Exeter Ship Canal and the Heritage Harbour' commissioned by the</p>	<p>supporting text to code W05 has been amended to state that the Route Map is intended to assist in bringing these item forwards and code W05 clarifies that applicants must engage with the users of the Canal, River and city Council at an early stage to understand their aspirations and requirements and define how development can best support these. It is not necessary to refer to the Port Authority, as it is part of the City Council. The suggested amendments to paragraphs 2, 3 and 4 have been made.</p> <p>Comment noted. Code W05 has been amended to clarify that craning points must be maintained at West Quay, East Quay and Gabriel's Wharf.</p>

Name	Organisation	Comment	Response
		<p>Friends with a grant from the IWA Southwest Inland Waterways Regeneration Fund and made available to Exeter City Council on 4 September 2023. (See paragraph 2, p 6 of this document, above.) The Harbour Master has also called for the Gabriel’s Wharf craning facility to be retained.</p> <p>In addition, all water related uses should assured by providing necessary road access, turning space and parking, while at Gabriel’s Wharf this must accommodate cranes of up to 300 tonnes capability to get to the waterside, together with articulated vehicles for onward carriage. W05 must also include slipways, the first item in the adjacent list of bullet points, if this list is to be cut. A slipway of any size needs adequate access, be it for cars, trailers, lorries or cranes.</p>	<p>Comment noted. Code W05 requires applicants to engage with users of the Canal and River and ECC at an early stage to understand their aspirations and requirements and define how development proposals can best support these. Code W11 has been amended to state that Gabriel’s Wharf is required to safeguard a craning point and vehicle access for articulated lorries and a crane. Code W05 has been amended to require exploration of opportunities to improve the existing slipway at West Quay – this would include consideration of access.</p>
		<p>Employment opportunities: (p.59 – text on white and W07 in pink box)</p> <p>To underpin Water Lane as a true waterside community these paragraphs should give greater encouragement to maritime businesses and employment opportunities to be located at ground floor level. They should have precedence over other employment uses when property vacancies occur, and pop-ups should be available for start-up and short-term maritime related tenancies. Examples that could be compatible with residential use above, include digital and traditional boat design and research projects, skilled work such as sail, mast and wooden tackle making</p>	<p>Comment noted. Code W07 includes maritime employment uses as a potential type of employment use at Water Lane. The planning system does not enable the Council to give precedence to maritime employment uses above other forms of employment and planning applications will be considered on their individual merits.</p>

Name	Organisation	Comment	Response
		<p>and other traditional craft and carpentry jobs, spaces for training in such skills, and offices for specialist water related businesses.</p> <p>W08 – Existing uses (p.59) The box should emphasise the fruitful potential flowing from Exeter’s designation as a Heritage Harbour and the requirements of existing and planned water related activities, projects and businesses envisaged in the Route Map. There is already shortage of space and available buildings at the Basin/Harbour.</p> <p>The Canal itself is an existing business.</p> <p>Para 1, line 2: Suggest ‘in the area’ reads ‘in the adjacent, wider area’.</p>	<p>Comment noted. The first paragraph of W08 already requires applicants to consult with existing and buildings and organisations in the area to explore opportunities to provide space which caters for their future needs.</p> <p>Comment noted.</p> <p>Comment noted. “In the area” is an appropriate term.</p>
-	Cillarda Group Exeter Ltd	<p>New Primary School</p> <p>2.2 The preferred location for the new primary school is shown at Water Lane North, on the former gasworks site, with alternative options shown at Water Lane South, to the south of the Electricity Distribution Site on the land owned by Cillarda, and also on Vulcan Estate land to the north of the Electricity Distribution Site.</p> <p>2.3 It is noted that the location of the new primary school on the gasworks site, shown as the preferred location in the draft SPD, impacts on the optimal location for relocation of the Pressure Reduction Station and its connection to a new high pressure gas main re-route, as concluded in an options and feasibility assessment by Pythia (Wales and West Utilities Consultants).</p> <p>2.4 Delivery of high-quality development and placemaking</p>	<p>Support noted and objection noted. The SPD has been amended following further assessment of options for the potential size and location of the primary school. This work has included preparation of a Primary School Options Appraisal and discussions with the Cillarda Group and other stakeholders at Water Lane including Devon County Council. The Appraisal explores options for locating the school and its size and the conclusions are reflected in the SPD. Devon County Council have confirmed that a new primary school is necessary at Water Lane and ongoing collaboration between the key stakeholders will be necessary to determine its final location and size. Developer contributions will be required to help fund delivery of the school.</p>

Name	Organisation	Comment	Response
		<p>on our client's land is very challenged in terms of technical constraints and viability. The same will be true of other land within the SPD area. Therefore, there needs to be both certainty on the location for the new school and a location that will not significantly weaken the viability and deliverability of development.</p> <p>2.5 The draft SPD, in setting out three options introduces great uncertainty. This uncertainty, in combination with the land-take required for the option to the south of the Electricity Distribution Site, on the land owned by Cilldara, jeopardises the viability and deliverability of the mixed-use development proposal that is currently the subject of a live outline planning application.</p> <p>2.6 Public land ownership can play an important role in providing a degree of certainty over delivery of public facilities such as a school, where there is land in public ownership that is in a suitable location. The land at Michael Browning Way is in public ownership and is in a suitable location.</p> <p>2.7 It is considered therefore that the priority for this Council owned land at Michael Browning Way and fronting on to Water Lane, should be its use, in conjunction with a small area of adjoining land, for future provision of a new primary school. Currently this land is shown in the draft SPD as the location for a mobility hub, which is illustrated at A05 in the draft SPD as predominantly comprising a multistorey car park.</p> <p>2.8 It is acknowledged that some parking provision is needed to serve development at Water Lane North on the former gasworks site the proposed new school and to replace at least a proportion of the existing surface level parking at Michael Browning Way. However, use of public</p>	

Name	Organisation	Comment	Response
		<p>land should be driven by priorities and as above, it is considered that the priority for the Council owned land should be delivery of a new primary school, as an essential piece of public infrastructure to support and enable regeneration. A mobility hub can then be provided elsewhere within Water Lane North. Some replacement public parking could be provided through provision of at least one deck above part of (safeguarding residential amenity) the existing Haven Banks Car Park at the north-eastern end of Michael Browning Way.</p> <p>2.9 We therefore object to the draft SPD proposed location options for a new primary school and request that the SPD identifies land at Michael Browning Way as a fixed location for a new school.</p>	
		<p>W05-Craning Point It is agreed that there needs to be a craning point to serve the canal and the locations shown on the Regulating Plan (pp 27/27) at the Canal Basin, incorporating any necessary strengthening, are supported. These locations are shown as 'fixed'. However, at W05 (p57) Gabriel's Wharf is also proposed as an option for the craning point. This is not a suitable location given that it necessitates the need for closure of Water Lane to provide large vehicle crane access and the proposal to create a new residential-led mixed use neighbourhood, incorporating a multi-functional public space at Gabriel's Wharf. The reference to a craning point at Gabriel's Wharf is objected to and we request that this is removed from the draft SPD.</p>	<p>Comment noted. Code W11 has been amended to state that Gabriel's Wharf is required to safeguard a craning point and vehicle access for articulated lorries and a crane. This amendment has been made following further discussions with landowners and stakeholders, including the Cilldara Group.</p>
		<p>Utilities At W09 (p59), the draft SPD requires proposals to consider consolidation of utilities infrastructure, coordination of the</p>	<p>Support noted and comment noted. Continuing collaboration between the landowners will be necessary to resolve matters</p>

Name	Organisation	Comment	Response
		<p>relocation and provision of new services and accommodation of existing strategic infrastructure where this is not being relocated, including along Water Lane. This requirement is broadly supported. However, utility infrastructure is absolutely essential to delivery of development, and we consider it important that the SPD states the necessity of diverting the existing high-pressure gas main because the exclusion zone either side of this main running under Water Lane precludes development in this area. This diversion requires a coordinated approach across Water Lane South and North, linked to the access strategy, not least because it has significant implications for access whilst works are underway. The access strategy described under 2.10 and 2.11 above and in more detail at Appendix 1, facilitates delivery of a coordinated approach to diversion of the high pressure gas main and maintenance of continuous access.</p> <p>3.4 We therefore request that the SPD states the essential need for diversion of the high pressure gas main in a manner that is linked to the access strategy as described at 2.10 and 2.11 above and at Appendix 1.</p>	<p>such the route of the high-pressure gas main, with Council oversight.</p>
-	National Grid (NG) and Wales and West Utilities (WWU).	<p>W04-Code Requirement 'W04 - Primary school' is provided on Page 56 of the Draft SPD and states: "A two-form entry primary school with early years provision and space for a children's centre should be provided at Water Lane. The school should provide a playing pitch, hard play area, outdoor classroom areas and preferably areas for forest school or wildlife areas. This will be balanced with a compact form appropriate to the</p>	<p>Comment noted. The SPD has been amended following further assessment of options for the potential size and location of the primary school. This work has included preparation of a Primary School Options Appraisal and discussions with the National Grid, Wales and West Utilities and other stakeholders at Water Lane including Devon County Council. The Appraisal explores options for locating the school and its size and the conclusions are reflected in</p>

Name	Organisation	Comment	Response
		<p>central location and proposed higher density development. The school should incorporate minimal on-site parking provision and utilise the proposed mobility hub to make best use of land. Refer to the active streets chapter for further mobility hub details.</p> <p>The school should be located adjacent to or near to the Neighbourhood Centre and must contribute to the street. This could include a prominent entrance and co-locating community uses with windows facing the street.</p> <p>Three options have been identified for the school location. The preferred option to support successful placemaking is a portion of the former Gasworks site to the east of Water Lane, as this is closest to the neighbourhood centre and incorporates existing mature trees. Alternative options include to the north or south of the electricity substation on the western side of Water Lane.</p> <p>The size of the school site is to be determined through discussions between applicants, Devon County Council and Exeter City Council.</p> <p>Site constraints including, but not limited to, safe access and egress, contaminated land and proximity to existing utilities, including the high pressure gas main and electricity substation, will need to be addressed”.</p> <p>The location of the three options for the primary school is shown in Image 6, below.</p> <p>The Draft SPD does not provide detail in respect of the design of the school and operational requirements, including the area of land required for this (which the Draft SPD states will be discussed further between applicants, Devon County Council and Exeter City Council), although</p>	<p>the SPD. Devon County Council have confirmed that a new primary school is necessary at Water Lane and ongoing collaboration between the key stakeholders will be necessary to determine its final location and size. Developer contributions will be required to help fund delivery of the school.</p>

Name	Organisation	Comment	Response
		<p>our understanding based on our most recent discussions is that over 1.3ha is earmarked in the current version, which amounts to around one-third of the total Gasworks site area. However, this has wider financial and developmental implications.</p> <p>The Draft SPD does not provide any analysis or justification around the reasons for discounting the other two alternative options for the primary school, which sit outside of the Gasworks site to the south and west. Nor is there any consideration given to the relationship between the school and the remaining residential development. As discussed above, given that regular meetings have been held between our clients and the Council, and that the school allocation was not discussed until the meeting in September 2023 (but was specifically not mentioned in our initial pre-application advice discussion in June 2023), the justification for the preferred allocation is not clear.</p> <p>Further, on learning about the Liveable Water Lane SPD, our clients made a request to the Council that the public consultation be deferred to allow time for discussions between the parties, however, this was disregarded.</p> <p>Critically, in order to enable any redevelopment of the Gasworks site, the existing PRS must be relocated. This, linked with gas main rationalisation is imperative in order for WWU to continue to supply Exeter with gas, as per their obligations as the Licenced Gas Transporter.</p> <p>Having fully assessed a number of potential operational options over the last two years for the relocation of the PRS, the only feasible option, as supported by external consultants, is for the PRS to be located within the</p>	

Name	Organisation	Comment	Response
		<p>southern corner of the Gasworks site, where the Council has shown its preferred option for the primary school. Clearly the Council's preferred location for the primary school is not compatible with the only feasible option for the relocation of the PRS. This location for the PRS is crucial for a number of reasons, namely, that it falls outside the Flood Zone, it can connect to, and will facilitate future access to, the existing gas infrastructure that continues down Water Lane, and it would be at the edge of the site, allowing the remainder of the Gasworks site to be redeveloped. This location has been independently assessed by specialist engineers, Fingleton White, and they too have concluded that this location is the only realistic one within the development site, having regard to a range of technical, operational and safety considerations. Access to the replacement PRS compound will also need to be provided for safety and maintenance checks.</p> <p>This location also enables the removal of the high pressure main as it currently traverses the site, which is absolutely essential in order to facilitate any meaningful and viable redevelopment of the site. This has all been conveyed to the Council during previous discussions with our clients.</p> <p>Under the proposed development scheme for the Gasworks site by selected development partner, Cubex, gas main rationalisation, the new PRS, and site remediation are all self-funded, without the need for any financial support from the Council or grant aid provision. Further, Cubex has taken on board the above parameters in designing the layout of a residential-led scheme, which includes a buffer around the replacement PRS and retained easements and</p>	

Name	Organisation	Comment	Response
		<p>access to the existing gas main, which will run diagonally across the Gasworks site. Notably the Cubex proposals also include the other elements of the Council's aspirations (neighbourhood centre, green space, boat storage etc).</p> <p>The provision of a primary school in the Council's preferred location would negate the extensive works that our clients have undertaken to-date with Cubex and would inhibit the redevelopment of the site, principally because the value of the remaining parts of the site would be insufficient to outstrip the extensive outgoing costs necessary to facilitate any development on the site (totalling circa £10 million at the date of this correspondence, to include gas infrastructure rationalisation and remediation). It would also preclude the southern part of the Gasworks site being used for the replacement PRS which, as we have established, is fundamental for any alternative use of the wider Gasworks site and indeed any development beyond the site boundary.</p> <p>No details have been provided within the Draft SPD on how the school would be funded, particularly relevant in the light of the aforementioned extensive works and costs. Evidently, the proposed location of the primary school cannot materialise and failure to agree an alternative solution will most likely result in the significant proposed investment into the existing gas infrastructure being rescinded, which in turn will mean that the wider redevelopment aspirations for the Water Lane area, which rely so heavily on updated gas infrastructure and gas main replacement, not being realised.</p> <p>Bearing this in mind, officers must remember that the</p>	

Name	Organisation	Comment	Response
		<p>Gasworks site is operational, and that there is a demand for additional storage and associated depot land in the area, which the site could easily be used for if a realistic, viable solution cannot be reached. Irrespective of the proposed relocation of the PRS and work to-date with Cubex, the proposed location of the school sits above an existing high-pressure gas main. Plainly a school cannot be built on or within close proximity to a high-pressure gas main. No detail has been provided on how this would be managed, and such restrictions were made known to the previous Chief Executive and officers at an early site meeting. In addition, no input has been requested from our clients to demonstrate how the proposed school could be compatible with the high-pressure gas main and surrounding gas infrastructure at the Gasworks site, including how the existing/ proposed gas infrastructure could be accessed for maintenance. Another important consideration that appears to have been overlooked, both in terms of practicality and funding, is that the land on which the school is proposed is suspected to be contaminated. As such, there would be extensive works and costs associated with remediation.</p> <p>Again, our clients preferred proposal manages and funds these costs on the assumption of a deliverable, viable end-development, as offered by the Cubex scheme. The addition of a primary school negates this entirely, creating a completely unviable development context.</p> <p>To repeat, this plainly means that the identified constraints will not be removed and that the site will remain operational, the PRS will not be relocated, and the</p>	

Name	Organisation	Comment	Response
		associated gas main will remain along Water Lane in its current form, with associated blast zones. This effectively means that the content of the Water Lane SPD is not deliverable, and the projected housing numbers proposed will not materialise.	
-	-	4.5, P51 It says that Water Lane has attracted people from all stages of life, including families. Many docs which refer to low traffic use say that it is v diff for families to cope without a car.	Comment noted. Code A11 sets an indicative average of 1:5 parking to dwelling ratio and the area will also be supported by car clubs. Water Lane is planned as a mixed-use neighbourhood where families (and other residents) can access local services, facilities and employment opportunities by active travel and public transport, without needing to use a car.
		W02-The buildings of Exe Water Sports Association at 62 Haven Road are shown in yellow as allocated for residential led development. These should be shown as for water related sports facilities.	Comment noted. Code W02 has been amended to show 62 Haven Road as a site for residential-led development, with an opportunity for water-related uses fronting the canal basin (e.g., at ground level). The buildings of the EWSA are, in planning terms, both community and sport facilities. As such, they are protected against loss by policy CP10 of the Exeter Core Strategy (under which the Council would expect any planning application to redevelop these buildings and facilities to provide or contribute towards the provision of new and improved buildings and facilities) and policy L7 of the Exeter Local Plan First Review (under which the loss of sporting facilities which serve a local area will not be permitted if this would harm sports opportunities in the area). These two policies are proposed to be replaced by policy IC3 of the emerging Exeter Plan, which states that existing services and facilities that meet community, social, health...cultural, leisure and recreation needs will be

Name	Organisation	Comment	Response
		<p>W02-only shows two craning points: one on the East quay and one near the end of Michael Browning Way. It is essential for the operation of a working canal that a craning point is provided at Gabriel's Wharf, and that it is strong enough to be able to deal with large vessels.</p>	<p>protected, unless it can be demonstrated that they are surplus to requirements or sufficient/improved provision is to be provided. It also states that proposals to provide new or improved community services and facilities will be supported. Therefore, the EWSA buildings are afforded a significant amount of protection under both the existing and emerging development plan. Comment noted. Code W02 has been amended to require provision of a craning point at Gabriel's Wharf, in addition to East Quay and West Quay.</p>
		<p>W03-Neighbourhood centre set back from the waterfront needs to specify the distance and provide a scale according to the height of the buildings.</p>	<p>Comment noted. The Neighbourhood Centre is not proposed to be located adjacent to the waterfront; therefore it is not necessary to specify a set back. The maximum height of buildings across Water Lane is coded for in L03.</p>
		<p>W05 - 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.</p> <p>The text on white background needs to include the provision of public toilets. The ECC staff member said that this could not be included because the council is strapped</p>	<p>Comment noted. The Harbour/Port Authority is part of Exeter City Council. Code W05 has been amended to refer in full to the River and Canal User Group and the Exe Water Sports Association.</p> <p>Comment noted. The supporting text to code W05 has been amended to refer to public toilets.</p>

Name	Organisation	Comment	Response
		<p>for cash. I responded that this is a long-term document and is aspirational. Public toilets are essential.</p> <p>Water related uses needs to add road access. A slipway without road access for lorries, cranes, vehicles with trailers is no use.</p> <p>W05-Water related uses in the coloured panel: good access to the water needs to be defined, i.e., it means lorry access so that a crane can be transported.</p>	<p>Comment noted. Code W05 requires applicants to engage with users of the Canal and River and the Council at an early stage to understand aspirations and requirements and define how development proposals can best support these. Any new/improved slipway delivered as a result of this engagement would, as a matter of course, need to be provided with adequate access.</p> <p>Comment noted. The term “good access” implicitly means access that is appropriate to the water-related space/feature being provided.</p>
-	-	<p>W02-Land use plan. Appreciate it may be difficult for ECC to admit this given the solar farm has only just been delivered, but the location of this now seems like poor use of valuable land? Are there any plans to revisit the location of the solar farm or explore elevating it above development in future?</p> <p>What is the rationale for the car parking for leisure hub? This should be car free to meet wider transport and net zero goals.</p> <p>W06-What are the social housing requirements? Opportunity to deliver significant high quality social housing here. The housing crisis is really a social housing crisis.</p>	<p>Comment noted. The Council is satisfied that the solar farm is an appropriate use at Water Lane.</p> <p>Comment noted. It is considered that provision of a modest new car park would support improved leisure use of the Clapperbrook Hub area, for example by allowing cars with trailers for boats/kayaks to park close by.</p> <p>Comment noted. The Council has a planning policy in place that seeks to secure 35% affordable housing on all sites proposing 10 homes or more (or 20% affordable housing in the case of Build to Rent developments, as per national</p>

Name	Organisation	Comment	Response
			planning policy). This policy (or its Exeter Plan replacement) will be applied at Water Lane.
-	Exeter Civic Society	<p>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.</p> <p>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.</p> <p>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.</p>	<p>Comment noted. Code A11 sets an indicative average of 1:5 parking to dwelling ratio and the area will also be supported by car clubs. Water Lane is planned as a mixed-use neighbourhood where families (and other residents) can access local services, facilities and employment opportunities by active travel and public transport, without needing to use a car.</p> <p>Comment noted. It is unnecessary to define charitable sector and heritage centre in the SPD. The City Council will oversee the co-ordination of plans and phasing through development delivery and management processes. The code is considered to be placed appropriately within the SPD.</p> <p>Support noted and comment noted. Code W02 has been amended to show 62 Haven Road as a site for residential-led development, with an opportunity for water-related uses fronting the canal basin (e.g., at ground level). The buildings of the EWSA are, in planning terms, both community and sport facilities. As such, they are protected against loss by policy CP10 of the Exeter Core Strategy (under which the Council would expect any planning application to redevelop these buildings and facilities to provide or contribute towards the provision of new and improved buildings and facilities)</p>

Name	Organisation	Comment	Response
		<p>How has the council determined the mix of employment and residential use?</p>	<p>and policy L7 of the Exeter Local Plan First Review (under which the loss of sporting facilities which serve a local area will not be permitted if this would harm sports opportunities in the area). These two policies are proposed to be replaced by policy IC3 of the emerging Exeter Plan, which states that existing services and facilities that meet community, social, health...cultural, leisure and recreation needs will be protected, unless it can be demonstrated that they are surplus to requirements or sufficient/improved provision is to be provided. It also states that proposals to provide new or improved community services and facilities will be supported. Therefore, the EWSA buildings are afforded a significant amount of protection under both the existing and emerging development plan.</p> <p>Comment noted. The Full Draft Exeter Plan proposes that Water Lane will deliver approximately 1,600 homes, based on an assessment of the potential densities described in the SPD. The Plan proposes retention of existing levels of employment floorspace.</p>
		<p>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.</p> <p>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.</p>	<p>Comment noted. The graphic on page 56 is purely illustrative.</p> <p>Comment noted. It is considered unnecessary to number the diagrams. It is not proposed that the Neighbourhood Centre will adjoin the waterfront, therefore it is not necessary to specify a setback.</p>

Name	Organisation	Comment	Response
		<p>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.</p>	<p>Support noted and comment noted. The SPD has been amended following further assessment of options for the potential size and location of the primary school. This work has included preparation of a Primary School Options Appraisal and discussions with the National Grid, Wales and West Utilities and other stakeholders at Water Lane including Devon County Council. The Appraisal explores options for locating the school and its size and the conclusions are reflected in the SPD.</p>
		<p>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.</p> <p>Codes are supposed to include sketch examples, and in this case, accessing new pontoons and the position of a slipway should be shown.</p>	<p>Support noted and comment noted. The Harbour/Port Authority is part of Exeter City Council. The SPD has been amended to refer to the River and Canal User Group and the Exe Water Sports Association will be referred to in full. The term "good access" implicitly means access that is appropriate to the water-related space/feature being provided.</p> <p>Comment noted. Code W05 does not specifically require the provision new pontoons, although has been amended to include reference to improvements to the existing slipway at West Quay. It is not considered necessary to provide a sketch example of this potential scheme.</p>

Name	Organisation	Comment	Response
		Addressing the narrow footpath adjacent to River Meadows could be included here, to provide an improved walkway for the neighbourhood.	Comment noted. Widening of the Canal towpath is covered in code A28.
		The provision of public toilets needs to be added as an essential requirement.	Comment noted. Proposals for new public toilets may come forwards under code W05.
		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.	Comment noted. Code S11 requires balconies to be provided for all dwellings above ground floor, unless if can be clearly justified that this is not suitable or feasible. The Council has no plans to update the Residential Guide SPD, which is fit for purpose.
		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.	Comment noted. Code W07 specifies that employment uses must be compatible with residential use. Code C03 specifically supports the provision of space for creative and digital business. Planning applications for employment uses will be considered on their merits, against existing national and local planning policies.
		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.	Comment noted. It is not considered necessary to list the existing businesses in the SPD, which may also change over time.
		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.	Comment noted. There is significant strategic utilities infrastructure at Water Lane and it is important that proposals consider opportunities for its consolidation.
-	Haven Banks Residents' Group	Buildings seem too close together: they appear as being on top of each other with very little space between buildings and overlooking each other.	Comment noted. The Council considers that the SPD will help to ensure that Water Lane is developed as a high-quality neighbourhood.

Name	Organisation	Comment	Response
		W01 We agree there is infrastructure required, such as, schools, doctors, dentists, and etc.	Comment noted.
		W05 Could the seventh bullet point on page 57 be incorporated into the Design Code, 'Car parking in the right places for those that bring their own equipment.'? Parking required for businesses and water sports in right areas. Need storage and disabled access. Access required for disabled and others.	Comment noted. Code W05 requires applicants to engage with users of the Canal and River and the Council at an early stage to understand aspirations and requirements and define how development proposals can best support these. Car parking requirements to support water-related uses would form part of these discussions. Code W12 (Clapperbrook Hub) codes for the provision of a modest new car park that is accessible for vehicles with boat trailers (etc.). Code A09 has been amended to require that the hub is accessible for those with disabilities and includes disabled parking. Code A11 has been amended to state that parking and access rights will be safeguarded for existing residents and landowners.
		W06 There should be no co-living allowed, unless the Council publish planning policy describing the parameters of co-living, in which case it must follow those rules. In general co-living should be discouraged in this area.	Comment noted. It is important that Water Lane is developed as a long-term and stable mixed community. Code W06 requires development to provide a mix of housing that caters for a broad demographic and takes account of local needs and states that housing typologies that are dedicated to a narrow demographic, such as co-living, must not dominate the area. The 2022 Exeter Local Housing Needs Assessment identifies that co-living housing offers opportunities for groups such as recent graduates to establish themselves in Exeter as an alternative to living in HMOs. Codes including M03, M06, L06, C01 and C06, alongside heritage and design policies in the Exeter Local Plan First Review and Core Strategy and emerging policies in the Exeter Plan, will help to ensure that development is respectful of the city's character/historic character. Codes including M03, M06, L06,

Name	Organisation	Comment	Response
			C01 and C06, alongside heritage, design and amenity policies in the Exeter Local Plan First Review and Core Strategy and emerging policies in the Exeter Plan, will help to ensure that development is respectful of the city's character/historic character and provides residents with adequate levels of amenity.
-	Local residents from the Haven Banks area	Budlings too close to, on top of, each other. Small spaces between buildings. Overlook each other. Infrastructure required - schools, doctors, dentists.	Comment noted. The Council considers that the SPD will help to ensure that Water Lane is developed as a high-quality neighbourhood. Together with adopted policies in the Exeter Local Plan First Review and Core Strategy and the emerging Exeter Plan and associated IDP, the SPD seeks to ensure that the new neighbourhood is supported by appropriate infrastructure.
		W05 -Parking required for businesses and water sports in right areas. Need storage and disabled access. Access required for disabled and others.	Comment noted. Code W05 requires applicants to engage with users of the Canal and River and the Council at an early stage to understand aspirations and requirements and define how development proposals can best support these. Car parking requirements to support water-related uses would form part of these discussions. Code W12 (Clapperbrook Hub) codes for the provision of a modest new car park that is accessible for vehicles with boat trailers (etc.). Code A09 has been amended to require that the hub is accessible for those with disabilities and includes disabled parking. Code A11 has been amended to state that parking and access rights will be safeguarded for existing residents and landowners.
		W11 - Broadly agree with proposal	Support noted.
-	Green Party	WO2 land use plan The area funding the Canal Basin is designated as	Comment noted. Code W02 has been amended to show 62 Haven Road as a site for residential-led development, with an opportunity for water-related uses fronting the canal basin

Name	Organisation	Comment	Response
		<p>residential led development. This should be designated as mixed residential and employment area.</p> <p>The energy substation is still in the middle of the site, and it is proposed that there is residential led development all around it. No, it is not acceptable as a location for children to be located next to the substation as there may be health implications of living next door or having an educational facility right next door to an electricity substation. It is probably more appropriate for other occasional uses to be associated immediately adjacent that</p>	<p>(e.g., at ground level). The buildings of the EWSA are, in planning terms, both community and sport facilities. As such, they are protected against loss by policy CP10 of the Exeter Core Strategy (under which the Council would expect any planning application to redevelop these buildings and facilities to provide or contribute towards the provision of new and improved buildings and facilities) and policy L7 of the Exeter Local Plan First Review (under which the loss of sporting facilities which serve a local area will not be permitted if this would harm sports opportunities in the area). These two policies are proposed to be replaced by policy IC3 of the emerging Exeter Plan, which states that existing services and facilities that meet community, social, health...cultural, leisure and recreation needs will be protected, unless it can be demonstrated that they are surplus to requirements or sufficient/improved provision is to be provided. It also states that proposals to provide new or improved community services and facilities will be supported. Therefore, the EWSA buildings are afforded a significant amount of protection under both the existing and emerging development plan.</p> <p>Comment noted. The SPD has been amended following further assessment of options for the potential size and location of the primary school. This work has included preparation of a Primary School Options Appraisal and discussions with stakeholders at Water Lane including Devon County Council. Code W02 now indicates provision of a primary school at the western end of the site allocation, at greater distance from the substation.</p>

Name	Organisation	Comment	Response
		<p>are not going to have people having to live next to a major electricity site. So, for example the mobility and delivery hub or the car parking for the leisure hub.</p> <p>The land use plan should incorporate the Green Infrastructure Framework and it should be a planning policy requirement, not just popping in nature just around the edges.</p> <p>Bromham's Field building should be specifically allocated as a neighbourhood centre as a community-owned building. Only part of it is designated at the moment for water space. This is not enough. The whole building needs to be taken into the land use plans so that it can have access to funding to rehabilitate it.</p>	<p>Comment noted. Planning policy requirements for green infrastructure are set out in section 4.8 of the SPD.</p> <p>Comment noted. The building at Bromham's Farm will not perform the function of a neighbourhood centre. The SPD has been amended to include Bromham's Farm within Water Lane's red line. This will enable developer contributions from Water Lane to be secured to improve the facilities at Bromham's Farm.</p>
		<p>W03 There should be a requirement in this block for community facilities to be community owned. This new community facility should not remove existing community facilities including that such as the Sea Scouts.</p> <p>There should also be intermediate neighbourhood play spaces near in between the developments further down towards Clapperbook Lane, so that residents can feel confident about their children going out to play in safety without having to go a long way off beyond their sight lines.</p>	<p>Comment noted. Community facilities are protected under existing (and emerging) planning policy and would need to be suitably replaced should they ever be redeveloped. Code Q17 allows for public and communal spaces and unadopted streets to be community-owned.</p> <p>Comment noted. Code S02 requires all new open space to be located to ensure easy access from all parts of the development and from the wider area.</p>
		<p>W04. There should be a requirement for a school and wildlife areas and the 'preferably' should be removed. The</p>	<p>Comment noted. Code W04 requires provision of a school. The SPD has been amended following further assessment of</p>

Name	Organisation	Comment	Response
		<p>school should not be sited next to the electricity substation. It should be a requirement for the primary school to be built before any residents move in.</p>	<p>options for the potential size and location of the primary school. This work has included preparation of a Primary School Options Appraisal and discussions with stakeholders at Water Lane including Devon County Council. The Appraisal explores options for locating the school and its size and the conclusions are reflected in the SPD. Provision of wildlife areas is not a fixed requirement for a primary school. Code W04 has been amended to state that phasing of the school's delivery is to be confirmed through further collaboration between landowners, Devon County Council and Exeter City Council.</p>
		<p>W05 'Water users' policy seems to consider water sports as the primary leisure activity. Thought should be given to swimmers, nature lovers, walkers and even anglers. A key purpose for the canal being an access to a working harbour is important. Opportunities for Canal boats or water taxi should be considered. Water related uses needs to include the provision of public toilets and changing and showering facilities. This could be incorporated into the Bromham's Field building. A pontoon will be needed, with sufficient parking to allow people to drop off/collect watercraft.</p>	<p>Comment noted. Code W05 has been amended to clarify that the Canal should provide space "suitable for commercial, heritage and active leisure water-related uses...". Code W05 is worded to ensure that the Port Authority (part of ECC) is engaged from an early stage in development proposals; and to allow opportunities for canal boats/water taxis, a pontoon with facilities for drop off/collection and public toilets/changing facilities to come forwards.</p>
		<p>W06 The rest of this document does not show in any way how there is any opportunity for custom build housing.</p>	<p>Comment noted. The SPD must amplify adopted planning policy. The Exeter Local Plan First Review and Core Strategy do not include policies on custom and self-build housing. Therefore the SPD is limited in what it can do to support this type of provision, aside from stating that it should be included as part of the housing mix. The Full Draft Exeter Plan includes a policy specific to the provision of custom and self-build housing.</p>

Name	Organisation	Comment	Response
		<p>Affordable housing must be based upon the local policy, not on the 20% minimum guidance for brownfield sites or co-living. There must be an upper limit for the number of student or co-living and co-living developments on the site taken as a whole. W07 Employment</p> <p>The emphasis on maritime employment uses should be prioritised because this is a unique opportunity for the area. This should be supported by appropriate infrastructure.</p>	<p>Comment noted. There is no national or local guidance that requires brownfield sites to provide 20% affordable housing. The Council has a planning policy in place that seeks to secure 35% affordable housing on all sites proposing 10 homes or more (or 20% affordable housing in the case of Build to Rent developments, as per national planning policy). This policy (or its Exeter Plan replacement) will be applied at Water Lane.</p> <p>Comment noted. Code W07 includes maritime employment uses as a potential type of employment use at Water Lane. The planning system does not enable the Council to give precedence to maritime employment uses above other forms of employment and planning applications will be considered on their individual merits.</p>
		<p>W08 It is not clear in the last section of this policy what it is trying to do. Is there a policy on waste and reinforcing the waste hierarchy? The Waste Strategy is referred to but probably not sufficient for a net zero development wanting to pursue a circular economy. There should be on site disposal of food waste for use in any district water heating system.</p>	<p>Comment noted. There is significant strategic utilities infrastructure at Water Lane. Code W08 aims to ensure that development proposals consider opportunities for the consolidation of this infrastructure, in order to provide positive placemaking outcomes. Code Q11 relates to the waste hierarchy.</p>
-	NHS Local Planning Authority Engagement	<p>W01 - General land use and activity and W03 - Neighbourhood Centre</p> <p>NHS Devon ICB has undertaken a review of its primary care estate across the whole of Devon.</p> <p>Investing in existing GP locations is more efficient from a staffing perspective and enables GPs to provide a wider range of integrated services which benefits patients.</p>	<p>Comment noted. Codes W01 and W03 and the illustration on page 56 have been amended so that they no longer refer to a GP surgery.</p>

Name	Organisation	Comment	Response
		<p>Therefore, in relation to the Water Lane proposals, the strategic direction for NHS Devon ICB is to expand and improve the current GP surgeries that would serve the new location rather than creating any new surgeries.</p> <p>To ensure that the vision of reduced reliance on private car use, there will need to be good public transport links and pedestrian/cycle routes to the nearest GP surgeries.</p> <p>W06 - Housing mix Key Workers: The NHS Is currently reviewing its requirement for key worker housing as access to affordable housing is seen as an obstacle to attracting new people to working in the local Devon healthcare system. Appropriate housing for older people which provides good on-site support services is very welcome for local people. However, if these schemes attract older people from outside of the local area this can increase the use of already overstretched NHS services creating further localised pressures on both GP and hospital services.</p>	<p>Comment noted. The SPD seeks to ensure that Water Lane is designed to encourage and enable travel by public transport.</p> <p>Support noted and comment noted. The Council is exploring the potential to secure affordable housing for key workers through the emerging Exeter Plan. The Council will continue to seek S106 contributions towards GP services.</p>
-	Sport England	<p>Welcoming Neighbourhoods – (Linked to AD3 principle 4 - Mixing uses and co-locating facilities)</p> <p>a. W02 - Sport England are concerned with the location of the Grace Road Fields, Wildlife, and renewable energy site location as this is far from residential units and the primary school and therefore may not be used by residents.</p> <p>b. We would also recommend that the leisure hub is located closer to other amenities to encourage its use.</p>	<p>Comment noted. Code S02 will ensure that the new neighbourhood incorporates open space in accordance with the Fields in Trust benchmark guidelines. The primary school will include provision for play space in accordance with Department for Education guidelines. Clapperbrook Hub is located to make best use of existing facilities at Bromham's Farm. It already has a high level of connectivity for people walking, cycling and taking the train and the SPD seeks to improve connectivity from Water Lane. It is anticipated that a leisure hub in this location would be well used.</p>

Name	Organisation	Comment	Response
		<p>c. W04 – Primary school. Sport England support the location of the primary school and the detail that a playing pitch would need to be incorporated into the site. Use the Exeter Playing Pitch Strategy (PPS) and consult with local NGB's to better understand the needs of this playing field size and use. Sport England would recommend that a Community Use Agreement is linked with the playing fields using info from our CUA website.</p> <p>f. W08 – consider how employees of existing business get to and from work and how they already engage with the local space. Encourage developers to put in place infrastructure that may allow employees to walk and cycling to work.</p>	<p>Support noted and comment noted. The use of a Community Use Agreement will be explored by the Council as planning for delivery of the school progresses.</p> <p>Comment noted. The Council's Sustainable Transport SPD requires proposals for workplaces employing 10 or more staff to include a travel pack and travel plan. This can include the provision of incentives for employees to travel by public transport or active travel.</p>
-	Historic England	<p>W05 – Water related uses</p> <p>This code highlights the importance of maintaining public access and space for water-related uses and of engaging local canal interest groups in drawing up proposals. The canal is itself a non-designated heritage asset and it would be beneficial if this section of the code identified this and specified that the Canal's historic significance (including its functionality where relevant) should be understood, conserved and where appropriate enhanced by new developments in the Water Lane area. A connection could be made with M01 in which the context analysis is required to consider relationships with the Canal.</p>	<p>Comment noted. Code W05 is specific to water-related uses of the Canal, rather than its value and function as a heritage asset, although the 2nd paragraph of the code has been amended to "Development proposals along the Canal should provide space suitable for commercial, heritage and active leisure water-related uses...". The need for development to consider the Canal (which will include consideration of its historic significance) is required under code M01. The Vision for Water Lane has been strengthened to refer to the adjoining area's Heritage Harbour status.</p>
-	Devon Wildlife Trust	<p>W02 - Land use plan</p> <p>Whilst we note that Grace Road fields has been identified within the plan as an area for wildlife, we note that the</p>	<p>Comment noted. Any proposals for renewable energy development at Grace Road Fields will be managed sensitively in accordance with adopt planning policies in the</p>

Name	Organisation	Comment	Response
		<p>opportunity for use as a renewable energy site has also been included within this designation. The use of the area to generate renewable energy will almost certainly reduce the value of the area for wildlife. Any proposals would need to be managed sensitively. Given that the main area identified for wildlife will have a combined use, we do not consider that the development includes sufficient green space, which is limited to a single small area within the northern extent of the site. Whilst we welcome the inclusion of green streets and lanes, these are unlikely to be sufficient to create adequate green space to meet the needs of the high-density residential housing. We would suggest the inclusion of a minimum of two additional areas of green space within the proposals. Nature-rich green space is the heart of a green and healthy development.</p>	<p>Exeter Local Plan First Review, the Exeter Core Strategy and relevant codes in the Water Lane SPD. Code S02 will ensure that the new neighbourhood incorporates open space in accordance with the Fields in Trust benchmark guidelines.</p>
-	-	<p>W02: Land use plan: This suggests that the Exe Water sports site opposite Maritime Court should be zoned as a residential site. This site is alongside the Canal Basin. It is vital that its existing role (water-based sports, boat use and storage) should be protected.</p>	<p>Comment noted. Code W02 has been amended to show 62 Haven Road as a site for residential-led development, with an opportunity for water-related uses fronting the canal basin (e.g., at ground level). The buildings of the EWSA are, in planning terms, both community and sport facilities. As such, they are protected against loss by policy CP10 of the Exeter Core Strategy (under which the Council would expect any planning application to redevelop these buildings and facilities to provide or contribute towards the provision of new and improved buildings and facilities) and policy L7 of the Exeter Local Plan First Review (under which the loss of sporting facilities which serve a local area will not be permitted if this would harm sports opportunities in the area). These two policies are proposed to be replaced by</p>

Name	Organisation	Comment	Response
			<p>policy IC3 of the emerging Exeter Plan, which states that existing services and facilities that meet community, social, health...cultural, leisure and recreation needs will be protected, unless it can be demonstrated that they are surplus to requirements or sufficient/improved provision is to be provided. It also states that proposals to provide new or improved community services and facilities will be supported. Therefore, the EWSA buildings are afforded a significant amount of protection under both the existing and emerging development plan.</p>
		<p>W05 Water Related Access: It is important that water access should be maintained and enhanced. This is especially true in the Canal Basin - for canoe, rowing and boat access and at Gabriel's Wharf where craning and access for delivery vehicles needs to be maintained.</p>	<p>Comment noted. Code W05 requires public access to be maintained across the whole length of the Canal and development proposals along the Canal to provide space suitable for water-related uses in places where there is or can be good access to the water. The code is worded to allow opportunities for access enhancements to come forwards. Code W05 has been amended to requirement maintenance of craning points at West Quay, East Quay and Gabriel's Wharf and for opportunities to be explored to improve the existing slipway at west Quay.</p>
-	-	<p>W01 - I am concerned that the fact that there is already a planning application in progress for one area of the Water Lane development (Haven Banks) means that the hoped for coordination and comprehensive development might not be achieved. I agree strongly with the stipulation that the development of community infrastructure such as the school, neighbourhood centre etc should be brought forward at an early stage.</p>	<p>Support noted and comment noted. The City Council is confident that the SPD will help to ensure that Water is redevelopment in a comprehensive and co-ordinated way.</p>

Name	Organisation	Comment	Response
		<p>W05 - As a member of the Friends of Exeter Ship Canal, I am pleased to note that developers must engage with this organisation and other stakeholders. I am concerned about retaining maritime industry in the Water Lane development and that this should be one of the examples of employment in the area. It is good that the importance of having at least one craning point (I think we should have two) to allow larger vessels to access the water has been recognised but, clearly, road access must also be provided to these craning points so that these larger vessels can be transported to and from the canal side.</p>	<p>Support noted and comment noted. Code W07 includes maritime employment uses as a potential type of employment use at Water Lane. The planning system does not enable the Council to give precedence to maritime employment uses above other forms of employment and planning applications will be considered on their individual merits. Code W05 has been amended to requirement maintenance of craning points at West Quay, East Quay and Gabriel's Wharf. Code W11 relating to Gabriel's Wharf has also been amended to ensure space is retained to allow large vessels to be transported from the Wharf.</p>
		<p>W06 - I agree that there should be a mix of housing in the development. As a large block of co-living accommodation is being planned for the Haven Banks site, I assume that other applications should provide homes for families and older people.</p>	<p>Support noted and comment noted. In accordance with code W06, the Council will require Water Lane to provide for a mix of housing, including for families and older people.</p>
		<p>W08 - I agree strongly that developers should work with existing businesses and organisations to make sure they can continue to operate effectively.</p>	<p>Support noted.</p>
-	The Diocese of Exeter	<p>The Water Lane Vision communicates a sense of high ambition for the neighbourhood centre: 'the natural gathering place which brings the community together [...] people are personally invested in the community and feel a strong sense of belonging'. The SPD's Introduction references NPPF paragraph 20 in terms of the requirement to make sufficient provision for "infrastructure and community facilities". Policy W03 concerning the Neighbourhood Centre states that 'suitable non-residential uses include (but are not limited to) 'a GP surgery / health</p>	<p>Comment noted. Code W01 has been amended to refer to places of worship.</p>

Name	Organisation	Comment	Response
		<p>centre, primary school, community facilities'. In respect of community facilities, NPPF paragraph 93 states "to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: (a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments [...]." To meet the Vision's high ambition, the challenge and requirements of all of NPPF paragraph 93 need to be addressed face on.</p> <p>Some of the community facilities enumerated in NPPF paragraph 93 are planned for positively in the Water Lane SPD eg open space, cultural buildings, (water-based) sports venues. However, others are not given any specific attention at all; they may be understood to be included within the general references to 'community facilities' but the absence of any explicit reference anywhere in the SPD indicates that they are not receiving the same degree (or even any) positive planning. In the absence of direct treatment elsewhere in the SPD, Policy W01, at a minimum, should make clear reference to those facilities listed in NPPF paragraph 93. Specifically, there needs to be a positive and clearly stated plan for places of worship in Water Lane.</p> <p>For the avoidance of doubt, the references to the Cathedral and St Leonard's Church / 'church spires amongst clusters of trees and buildings' in 'Memorable Places' (which relate to 'key' and 'glimpse' views to and</p>	

Name	Organisation	Comment	Response
		from Water Lane) should not be understood to be sufficient to satisfy NPPF paragraph 93, or even particularly relevant to it. Paragraph 93 is concerned with facilities and services to meet community needs rather than wider heritage and subjective aesthetic considerations, as desirable as they may be from a development perspective.	
-	-	W01, 02 + 03 – good ambitions.	Support noted.
		W04 – providing a primary school means that the accommodation must be of sufficient size for families not just single or double occupancy which is very welcome news.	Support noted.
		W05 – agree, it is very important to keep the canal fully functioning to prevent its deterioration and maintain its long-term future.	Support noted.
		W06 – why include ‘key workers’ as the only type of employment in a list of residents? It seems to suggest that they are separate to ‘families’ etc who need special facilities when what they really need is a decent wage to enable them to live in places like this – are they just being thought of as NHS staff or does it include the likes of ‘food distribution’ and there will be plenty of cafes for them to work in? It is to be welcomed that one type of housing should not dominate.	Support noted and comment noted. The term “key worker” can be defined as someone a who fulfils a role regarded as vital for the community, especially in the health, education, security and infrastructure sectors.
		W07 – new employment opportunities are welcome and should revitalize an area that was historically a hive of industry and is now sadly neglected.	Support noted.
		W08 – existing businesses should not have to suffer the brunt of progress so this proposal is good, why shouldn’t	Support noted.

Name	Organisation	Comment	Response
		the Ten Pin Bowling and Ride On Cycles (and Library) be relocated within developments?	
-	-	Agree with W05 and W06.	Support noted.
-	Exeter Community Centre Trust	<p>W03 - Neighbourhood Centre. The community meeting and cultural facilities should have separate emphasis in the code. Whilst sharing of space with school is welcomed, the Neighbourhood Centre should have separate spaces, to enable it to be a community hub with meeting space, charities and social enterprises rentable office spaces, primary healthcare allied services space e.g., clinic space and disabled parking for blue badge drivers.</p> <p>W06 - Housing Mix. The statement that no narrow type of housing e.g., student housing should dominate is welcome to ensure a balanced community. In previous instances developers have begun by designating housing for 'key workers' but have very quickly applied to change the designation and areas have then become mono cultures of student housing.</p> <p>The community infrastructure of hard landscaping should be created prior to housing, to ensure that landscaping, amenity and wild environment areas are not encroached upon by housing.</p> <p>W06 Housing - parking areas. It's all very well to aspire to have minimal parking, to encourage walking and cycling. In practice, residents will have cars, which need to be parked somewhere. Make an allocation of one car per new</p>	<p>Code W03 does not refer to cultural facilities as a suitable use within the neighbourhood centre, although the list (which includes community facilities) is not exhaustive. Code W03 seeks to ensure a well-functioning neighbourhood centre. Code A11 requires blue badge parking to be provided within predominantly car free areas and this would include the neighbourhood centre.</p> <p>Support noted.</p> <p>Codes in section 4.6 of the SPD aim to ensure that green and blue infrastructure at Water Lane is improved as a result of development.</p> <p>Comment noted. An average 1:5 allocated parking to dwelling ratio is indicated in code A11 and is considered appropriate for a low car neighbourhood. Parking is also required to support the ongoing tourist and leisure function of the Quay and Canal.</p>

Name	Organisation	Comment	Response
		residence or designate a resident only parking area somewhere within walking distance of housing. All Water Lane should be designated residents and blue badge parking only. This would stop the current weekend and holiday practice of people from outside the area parking in Water Lane, unloading bicycles and leaving cars whilst they cycle for leisure along the canal.	
-	-	<p>As a vision it's fine, however with the proposed development comes an increase in population which will put extra pressure on already creaking infrastructures, particularly health care provision. I see you've included school requirements, but I don't see any health centres.</p> <p>As this is also going to be attracting more visitors to the area there will be a need for access to public toilets; currently there are no public toilets on this side of the river in this proposed development area and Piazza Terracina. Litter and dog fouling is also an ongoing issue throughout the city so I anticipate it will also need to be taken into account here.</p>	<p>Comment noted. Code W03 of the draft SPD identified a GP surgery/health centre as a suitable use for within the neighbourhood centre. However, in its consultation response, the NHS advised their strategic direction for NHS Devon ICB is to expand and improve current GP surgeries that would serve Water Lane rather than creating any new surgeries. Therefore, reference to new GP provision has been removed from the SPD.</p> <p>Comment noted. The supporting text to code W05 has been amended to refer to public toilets. Litter bins will be provided within public areas.</p>

Q18. Do you have any comments on the Welcoming Neighbourhoods codes W10-W12?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	<p>W10 – Gas Works Place (p. 60)</p> <p>Please don't call it this. The Code must acknowledge this area as an important working area for the Basin, Heritage</p>	Comment noted. Gas Works Place is considered to be an appropriate name in the SPD, given that the Hub includes the

Name	Organisation	Comment	Response
		<p>Harbour and Canal as a whole, especially because pressure on space at East Quay on the other side of the Basin is increasing because of new activities including historic boat restoration and 'pop up' boat building.</p> <p>The projected loss of the Gabriel's Wharf craning, and shipyard facility puts pressure on plans as well as on available space for visiting and longer-term moorings and services for boats. Toilets, showers, and waste disposal at the Basin all need improvements. (See Greenwood Projects, 'An Assessment of Current Planning Proposals relating to the Exeter Ship Canal and the Heritage Harbour', September 2023.)</p> <p>Working space at the Basin will also be at a premium as options develop for water taxis and other passenger services and trips, and a limited return of freight traffic (see below). These are all developments that will help the city adapt to the challenges of new initiatives to achieve Net Zero.</p> <p>It is essential that the 'Gas Works Place' area is kept accessible to cranes and low loaders.</p> <p>This configuration is incompatible with the concept of the 'water space' as described and illustrated. The Canal and Basin at this point do not need to be 're-purposed' but encouraged to develop their own facilities. The space next to the former Gas Works Social Club, shown as a</p>	<p>entrance to the Gas Works site. Code W10 aims to ensure that the Hub functions as a water-related space.</p> <p>Comment noted. Code W11 has been amended to require provision of a craning point and associated storage/vehicle turning space at Gabriel's Wharf. The supporting text to code W05 has been amended to refer to public toilets and services for visiting and moored boats.</p> <p>Comment noted.</p> <p>Comment noted. Code W02 shows retention of craning points at the West and East Quays and code W05 has been amended to require retention of these two craning points.</p> <p>Code W10 does not seek to repurpose the Canal and Basin, referring only to the repurposing of the former Gas Works office. The graphic (which is illustrative only) indicates various areas with the potential for (additional) boat and maritime-related activities. As it shows an example of high</p>

Name	Organisation	Comment	Response
		<p>playground with trees, should be for boat and maritime related uses to provide adequate room for the Canal and Harbour to grow their services and attractiveness to maritime activity and business. These activities can also reach out to connect with the community and include spaces for community-led waterway and skills learning projects. The photograph showing a development option at Gloucester Docks is not fairly comparable in this context and should be removed.</p> <p>Para 2, line 6, and para 3, lines 2-3: Is it 'Maritime Court' or 'Compass Quay' that is meant?</p> <p>Para 3, first line: There is no need for an additional, distracting, 'feature building' at this site. The existing locally listed former gas works building, the Sea Cadets HQ, the old Welcome Inn and Exe View Cottages compose a coherent and historically appropriate built layout in line with their setting. It is better to incorporate them in the continuing function of the Basin.</p> <p>Line 6: 'Heritage centre' needs clarification and definition in light of the proximity of the heritage centre at the Custom House on Exeter Quay.</p> <p>W11 – Gabriel's Wharf and adjoining illustration (p. 61) The Friends of Exeter Ship Canal are far from alone in believing it misjudged and inadequate to consider Gabriel's Wharf in this way. The reasons for retaining existing facility</p>	<p>quality public realm and re-purposed industrial buildings, the photo of Gloucester Docks is considered to be appropriate.</p> <p>Comment noted. Reference to access has been removed from code W10 as it is now more appropriate covered in code A20 (concerning Haven Road).</p> <p>Comment noted. Disagree, it is considered that Gas Works Place provides an opportunity for a new feature building.</p> <p>Comment noted. Further definition of the term "heritage centre" is not considered to be necessary.</p> <p>Comment noted. Code W11 has been amended to state that Gabriel's Wharf is required to safeguard a craning point and vehicle access for articulated lorries and a crane. The graphic on page 63 (whilst only illustrative) has been amended to</p>

Name	Organisation	Comment	Response
		<p>at Gabriel's Wharf for the management and functionality of the Canal have already been set out by the Harbour Master; the Greenwood Projects consultancy report; responses by the Friends at various stages to the developers' Water Lane proposals; and sections of Exeter Civic Society's Water Lane Prospectus. The current response therefore references all these documents rather than repeats the details here, but this can be done if required.</p> <p>Despite the statement in W11 that 'development must ensure that water access at the wharf must be safeguarded', the adjoining illustration –</p> <ul style="list-style-type: none"> • provides for no vehicular or crane access to the water's edge • predetermines the question in paragraph 5 of W05 – Water related uses • allows for no slipway of sufficient size for larger boats of 20 tonnes or more • a pavilion café with outdoor seating and 'multi-functional public space' occupy the area behind the wharf where currently a boat can be craned out of the water and made safe or broken up in an emergency • a new pedestrian and cycle bridge across the Canal has been added that will slow down navigation. <p>Although the illustration is described' as 'illustrative', its inclusion inevitably causes deep unease as to the intentions behind the draft SPD.</p>	<p>indicate sufficient space for these requirements. Code W11 does not include provision for a slipway, as this is not supported by the Council in its role as the Port Authority. Code A27 is clear that the new crossing of the Canal must be designed to ensure the continued navigation function of the Canal. Paragraph of code W11 would allow for other potential water-related uses to be provided at ground floor level.</p>

Name	Organisation	Comment	Response
		<p>Paragraph 2, lines 2-3: W11 references only canoes, kayaks and paddle boards and ignores bigger boats (although one is pictured on the water). The cross reference to W05 does not clarify matters or offer any substantial reassurance as to what is meant by 'water related uses' in W05.</p> <p>Paragraph 4: Ground floor uses reference water related uses 'such as boat hire' only, (presumably hire of canoes and kayaks), in addition to local shops, cafes and work hub – ignoring potential water related employment opportunities that would help to underpin the waterside community. (See p. 7 of this document, above).</p> <p>All these show the inadequacy of W11 to meeting the situation and challenge at Gabriel's Wharf. An urgent and more imaginative re-think is needed to 're-vision' how to accommodate a vibrant, interesting working maritime area with residential, catering and other uses – and provide the small workshops referred to under 'Liveable buildings' (p. 63) that help create 'quirky streets to spend time in'.</p> <p>The future of Gabriel's Wharf points again to the need for a separate, holistic Canal and Basin Plan by the City Council and Port Authority. It would accommodate the functionality of the water and what happens on adjacent land and supplement the Water Lane SPD. While the draft SPD claims that the water will not be treated as just a pretty backdrop, this is what development at Gabriel's Wharf is shaping up to becoming, especially in light of the developers' outline planning application, which is awaiting</p>	<p>The Council understands the suggestion of the need to think about the Canal in a comprehensive way. Indeed, the thinking behind the Liveable Water Lane SPD sits within the wider context of its thinking about the Canal. However, the Council will not be preparing a specific SPD for the Canal. An SPD must hang off, and be supplementary to, existing planning policies in a full local plan. The current local plan for Exeter, made up of the Local Plan First Review and the Core Strategy, does not include a policy hook for further documents</p>

Name	Organisation	Comment	Response
		<p>a decision. The Friends emphasise again that compatibility is achievable and calls for an open re-examination of the possibilities.</p> <p>The photograph of the Marina at Bristol Docks is out of scale and context in the particular circumstances of Gabriel's Wharf.</p> <p>W12 – Clapperbrook Hub (p.62) Para 1 ignores the Canal as part of – and not merely 'adjacent to' – the strategic gateway to Marsh Barton Station. Combined bus and ferry tickets from the City Centre to the Quay with a ferry to the station and hop on–hop off points elsewhere on the waterway will add to opportunities for active travel and days out. Seasonally, water taxis would be part of the connectivity node at Clapperbrook Hub. See also A04 – Public transport on p. 89, where this point has also been omitted.</p>	<p>covering the Canal as a whole – therefore there is no policy for a Canal SPD to supplement. In addition, the majority of the Canal will remain unchanged going forward and therefore there isn't a need to respond to change in the same way as is the case at Water Lane. The Council must also prioritise other projects, in particular the Exeter Plan, in order that the wider-planning policy for the city is kept sufficiently robust.</p> <p>Comment noted. As an example of a water space, the image is considered to be appropriate.</p> <p>Comment noted. Reference to the Canal being adjacent to Marsh Barton station is accurate. Code W12 will support the provision of active travel improvements such as those suggested in the consultation response.</p>
-	Cilldara Group Exeter Ltd	<p>Gabriel's Wharf 3.5 The draft SPD sets out requirements for Gabriel's Wharf at W11 (p61). The requirements for Gabriel's Wharf, to create a local node and multi-functional public space with access to the canal, including for canoes, kayaks and paddle boards are broadly supported. However, the requirement for development to be well set back from the wharf, with potential for a building of 1-2 storeys within</p>	<p>Support noted and objection noted. Code W11 has been amended following further discussions with stakeholders and landowners including Cilldara.</p>

Name	Organisation	Comment	Response
		<p>the space, is considered too restrictive to a future detailed design process, with potential to result in a weakly defined and underused space. This restriction is objected to, and we request that it is removed/made more flexible.</p> <p>3.6 The orientation of the site means that it will receive sunlight during the day but shading as the sun sets is inevitable despite any set back of buildings. It is important that the detailed design process is able to explore the use of built form to help define the space and introduce uses and activity that are not simply set right back from the waterside. The draft SPD includes the example of the inlet marina on Bristol Harbourside, and here the buildings are of scale and generally close to the harbour edge, creating a waterside environment of character and active use. This is similarly the case for other successful parts of Bristol Harbourside, where historic buildings relate to the harbour, such as at the Arnolfini and Watershed.</p>	
-	-	<p>W10 P60 and W11 P61, and W12 P62 other pages Water hubs: The document shows various water hubs which are represented by boats on the water e.g. on P60. ECC is not clear what they mean by water hubs. 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 boats.</p> <p>W10 Gas Works Place is not a good location for a water hub as the canal is very narrow and so a pontoon cannot be located in the narrow part, but could be located further into the basin, or further along e.g., outside the old</p>	<p>Comments noted. Code W05 requires applicants to engage with users of the Canal and River and the Council at an early stage to understand their aspirations and requirements and define how development can best support these. This will include in relation to access, the location of pontoons, car parking etc. Code W05 has been amended to require retention of craning points at West Quay, East Quay and Gabriel's Wharf and for opportunities to be explored for improvement of the existing slipway at West Quay to provide access for a greater variety of craft. Code W12 indicates the provision of a modest new car park at Clapperbrook Hub to</p>

Name	Organisation	Comment	Response
		<p>Transco site. Each of the water hubs 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 boat storage e.g., hoops for kayak storage.</p> <p>In my opinion the canal does not need three water hub access points for boats and people to the canal, what it needs is one really good one, where there is a large slipway, good road access to the slipway for a mobile crane, vehicle and trailer parking, and no height restrictions for vehicles. Because of the nature of this type of traffic I suggest that the water hub access point is located in a more industrial area and away from waterside cafes, lots of pedestrian activity etc. Gabriel's Wharf is the only viable location for this water hub because it is the only location where it is known that the wharves can support a crane for large boats. The waterside café areas 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 pontoons do not become blocked.</p> <p>W10 P60 the panel has several references to Maritime Court. Maritime Court is located further along Haven Road. The buildings near Gas Works Place are Compass Quay.</p> <p>W11 P61 Gabriel's Wharf is the main location where slipway access can be provided for large boats to be transferred to the canal. This requires a large slipway, good</p>	<p>support water-related uses. As Port Authority, the Council is clear that there should be no new slipway at Gabriel's Wharf.</p> <p>Comment noted. Reference to access Maritime Court has been removed.</p> <p>Comment noted. As Port Authority, the Council is clear that there should be no new slipway at Gabriel's Wharf. Code W11 has been amended to require safeguarding of space for</p>

Name	Organisation	Comment	Response
		<p>road access to the slipway for a mobile crane, vehicle and trailer parking, and no height restrictions for vehicles.</p> <p>W11 P61 States that building frontages should be well set back from the wharf to reduce overshadowing of the space. This point is extremely important, and it should apply the whole way along the canal, taking into account the height of the buildings. The taller the building the larger the distance of setback that is required.</p> <p>W11 P61 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.</p>	<p>a crane and associated storage/vehicle turning space and access at Gabriel's Wharf.</p> <p>Comment noted. Codes L05, L07 and L14 code for the set back of buildings along the canal frontage.</p> <p>Comment noted. The image is illustrative only. The design and location of the pedestrian and cycle bridge will be informed by a Feasibility Study which will include consideration of the need to maintain navigation of the Canal, as per code A27.</p>
		<p>W12 P62 see the comments on water hubs, at W10 Gas Works Place above.</p> <p>At this location the entrance to the car park needs to have access for trailers, with a sufficient turning circle. Also, no height barriers for vehicles as many have roof racks.</p> <p>W12, P62 see information from the Valley Parks Masterplan below.</p>	<p>Comment noted. Code W12 has been amended to specify that any new car park needs to be accessible for vehicles with trailers and roof-racks.</p>
-	-	<p>Water spaces diagrams - it's not immediately clear where these are. The orientation of the diagrams appears totally random and is not indicated, making it very hard to tell what's proposed.</p>	<p>Comment noted. The location of the water spaces can be seen by referring back to code W02, at the start of the chapter. An orientation compass has been added to each diagram.</p>
		<p>W12-Clapperbrook hub - very hard to tell what's proposed due to strange orientation of the diagram and lack of context. Appears to remove the existing car park that's just</p>	<p>Comment noted. Code W12 proposes a potential relocation of the existing car park to land immediately adjoining</p>

Name	Organisation	Comment	Response
		<p>been upgraded as part of the station works, and build a new car park on top of the existing green waste facility? Overall, support the removal the car park here and redevelopment of the old toilet block - would be a great addition and remove unnecessary cars from the bridge. Is a car park necessary at all?</p>	<p>Clapperbrook Lane. A car park would support improved leisure use of this area.</p>
-	Exeter Civic Society	<p>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.</p> <p>W10 Gas Works Place. We hope a better name for this area will emerge from the community. Gas Works Place is not a</p>	<p>Comment noted. Codes W10, W11 and W12 have been amended to clarify their roles and potential functions. The Heritage Harbour Route Map is not a planning document and is not adopted as Council policy. However, the area's Heritage Harbour status is now referenced in the Vision and section 2.1 of the SPD.</p> <p>Comment noted. Gas Works Place is considered to be an appropriate name in the SPD, given that the Hub includes the</p>

Name	Organisation	Comment	Response
		<p>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.</p> <p>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</p>	<p>entrance to the Gas Works site. Code W05 requires applicants to engage with users of the Canal and River and the Council at an early stage to understand their aspirations and requirements and define how development can best support these. This will include in relation to access, the location of pontoons, car parking etc. Code W05 has been amended to opportunities to be explored for improvement of the existing slipway at West Quay to provide access for a greater variety of craft. As Port Authority, the Council is clear that there should be no new slipway at Gabriel's Wharf. Code W12 indicates the provision of a modest new car park at Clapperbrook Hub to support water-related uses.</p> <p>Comment noted. Reference to access has been removed from code W10 as it is now more appropriate covered in code A20 (concerning Haven Road). The images in the SPD are illustrative only. It is considered that Gas Works Place provides an opportunity for a new feature building. The Welcome Inn and Exe View Cottages are not included in the red line site boundary.</p>

Name	Organisation	Comment	Response
		building, and the Welcome Inn and Exe View Cottages continue the heritage feel of the area.	
		W11Gabriel'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 on 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.	Comment noted. As Port Authority, the Council is clear that there should be no new slipway at Gabriel's Wharf. Code W11 has been amended following further discussions with stakeholders and landowners including Cillarda. It has also been amended to require safeguarding of space for a crane and associated storage/vehicle turning space and access at Gabriel's Wharf. The image on page 63 is for illustrative purposes only. Code W05 requires applicants to engage with users of the Canal and River and the Council at an early stage to understand their aspirations and requirements and define how development can best support these. This will include in relation to the location of pontoons etc. The design and location of the pedestrian and cycle bridge will be informed by a Feasibility Study which will include consideration of the need to maintain navigation of the Canal, as per code A27.
		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	Comment noted node W12 has been amended to specify that any new car park needs to be accessible for vehicles with trailers and roof-racks. The SPD has also been amended to clarify the location of a potential replacement car park.

Name	Organisation	Comment	Response
		<p>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.</p>	
-	Haven Banks Residents' Group	W11 Broadly agree with proposal.	Support noted.
-	Green Party	<p>W10. Elsewhere it suggests that the school should be located on the gas site here. There is no mention of the school in this policy.</p> <p>The Sea Scouts do not wish to be relocated and have written to tell Cllr Moore and this has been forwarded on to the planning team. There should be discussion about this, especially as this is an ECC owned site. If any organisation is to be relocated, there should be compensation paid or a suitable building provided at similar level rents.</p> <p>The form and relationship to the neighbouring buildings need to be thought about because this will be right next to the former Welcome Inn and also the terraced houses in Cotfield Street.</p> <p>The Canal at the Gas works place is very narrow so unlikely to be the best place for a pontoon. This could be located</p>	<p>Comment noted. The draft SPD did not propose to locate the primary school at Gas Works Place.</p> <p>Comment noted. As a community facility, the Sea Cadets' building is protected under existing (and emerging) planning policy and would need to be suitably replaced should the site ever be redeveloped.</p> <p>Comment noted. Code L18 requires development proposals to respect the amenities of existing residents and states that building heights should generally be no more than two storeys higher than existing neighbouring development.</p>

Name	Organisation	Comment	Response
		<p>further into the Canal basin or further down. Each of the water hubs should show where the slipway or pontoon is to be located and how they might be accessed for loading/offloading. Different parts of the Canal/basin could be allocated for different types of water user to be able to safely access the water and a slipway provided with craning facilities.</p> <p>The flats nearest here are Compass Quay (not Maritime Court).</p>	<p>Comment noted. Code W05 requires applicants to engage with users of the Canal and River and the Council at an early stage to understand their aspirations and requirements and define how development can best support these. This will include in relation to the location of pontoons. The SPD has been amended to require retention of a craning point to lift vessels from the water and associated storage/vehicle turning space at Gabriel's Wharf. As Port Authority, the Council is clear that there should be no new slipway at Gabriel's Wharf. Code W05 requires opportunities to be explored to improve the existing slipway at West Quay.</p> <p>Reference to access has been removed from code W10 as it is now more appropriate covered in code A20 (concerning Haven Road).</p>
		<p>W11. The railway underpass from Gabriel Wharf to Marsh Barton needs to be drastically improved. It is narrow, dark, and grim, a lot of thought should be put into making the route safe and desirable.</p> <p>Welcome the commitment that water access at the Wharf is safeguarded.</p> <p>With regards to the existing homes at Gabriel's Wharf, developers should pay a contribution for these flats to be retrofitted to improve insulation and ventilation and be assessed for and have installed measures to reduce the risk of flooding which may rise as a result of the neighbouring development.</p>	<p>Comment noted. The Gabriel's Wharf underpass is identified in codes A29 and A30 as an active travel link that should be upgraded.</p> <p>Support noted.</p> <p>Comment noted. This would not meet the statutory tests for S106 Agreements. However, existing homes at Water Lane will, however, benefit from the planned flood risk measures.</p>

Name	Organisation	Comment	Response
		<p>W12. While the idea of a climate hub, outdoor activity centre or Play Space etc. is welcome, this contradicts policies in other areas, see points above. The Clapperbrook hub is not necessary. The Bromham's field building should be improved with section 106 payments so it can provide activities for sport and nature and cafe.</p> <p>The idea of moving the car park from there to the other side is welcome. Rather than having a visitor centre on the Grace Field side where there is new tree planting, it would be better for the building on Bromham's field site to be enlarged to incorporate a number of functions. It would also suggest that bicycle hire, or bicycle parking will be necessary too.</p>	<p>Support noted and comment noted. The Clapperbrook/Bromham's Farm area provides a good opportunity to create a local node/water hub given that it already benefits from good accessibility by train, cycle and foot and accommodates some existing leisure facilities. The red line for Water Lane has been amended to include Bromham's Farm, which will enable S106 contributions to be spent on improvements. Code A12 requires cycling parking to be provided in line with current government best practice guidance and bicycle hire is identified in code W12 as an acceptable use for the Bromham's Farm building.</p>
-	Sport England	<p>d. W12 - Clapperbrook Hub - The café at Clapperbrook Hub could provide changing rooms for pitches at Bromham's (outside this area SPD) and Grace Roads.</p> <p>e. Sport England welcome the emphasis around mixed use and co-locating facilities to encourage walking and cycling to different services. It is important to ensure that these facilities are well connected through walking and cycling routes and infrastructure such as bike parking and benches are provided.</p>	<p>Comment noted. Code W12 notes that the building at Clapperbrook Hub could provide for both functions.</p> <p>Support noted.</p>
-	Historic England	<p>W10 – Gas Works Place</p> <p>We are supportive of the retention and re-purposing of the Former Gas Works Office as a water related community hub.</p>	<p>Support noted.</p>
-	-	<p>I have described myself as dissatisfied with W10-W12 because I think there is too little attention being paid to</p>	<p>Comment noted. Code W05 requires applicants to engage with users of the Canal and River and the Council at an early</p>

Name	Organisation	Comment	Response
		<p>boat maintenance work and no consideration at all to boat building. I think there should be more space available for waterside work. The vision for the Water Lane Development includes the aim that it should be 'compatible with other existing land uses in the area particularly industry'. I think there is a danger here that Exeter's maritime industry will be lost. I think, instead, there is a great opportunity to develop and expand the employment opportunities in this area. And this would also contribute to the 'vibrancy' of the 'true waterside community' that the vision for the development refers to.</p>	<p>stage to understand their aspirations and requirements and define how development can best support these. This will include in relation space for boat maintenance and building. Code W07 includes maritime employment uses as a type of employment use that should be incorporated in development at Water Lane.</p>
-	-	<p>W11 - Building frontages should be well set back from the wharf to reduce overshadowing of the space. This should be the case for the whole of the canal path (i.e., including the northern canal one in L01 and the southern zone in L01).</p>	<p>Comment noted. Codes L05, L07 and L14 code for the set back of buildings along the canal frontage.</p>
		<p>W12 - Clapperbrook Hub - I think the new proposed car park should be on the other side of the railway line. The bridge across the train line here is insufficient to support a large car park in this area.</p>	<p>Support noted.</p>
-	<p>Exeter Community Centre Trust</p>	<p>There is potential in the plan for this area to become an exciting maritime cultural centre, with heritage centre, visitor amenities, cafes and water-related businesses thriving. The car parking area will generate income for the City Council or the Community Interest Company that manages the site. However, remember that car parking for disabled should be an important feature of any area in the Water Lane development - many people can't walk or cycle. So, the car parking area here should have ample</p>	<p>Comment noted. Code A11 requires blue badge parking to be provided within predominantly car free areas and this would include at the water-hubs.</p>

Name	Organisation	Comment	Response
		blue badge parking and access by taxi should be allowed to any of the visitor/heritage areas. Lessons should be learned from the Southernhay development where disabled people cannot get dropped by taxi anywhere nearer to shopping and restaurants than the Bollards in Southernhay or bottom of Gandy St.	
-	-	Very much welcome setting up a new changing room facility near Salmon Pool swing bridge and cafe facilities.	Support noted.

Q20. Do you have any comments on the Liveable Buildings codes L01-L13?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	<p>Liveable buildings (pp. 63-83)</p> <p>The canal and tow paths must not be shadowed by the height of buildings along the waterside frontages or inadequately set back from the tow path. Shadowing is detrimental to the water's ecology and the spaciousness of light and fresh air.</p> <p>The blockish sameness of buildings illustrated as viewed from the Canal (p. 64) does not realise the stated ambition of rich, creative variety of form, and sense of light and space</p> <p>Building density (pp. 65-68): Planning for maximum density must be conscious also of the experiences of high-rise and other schemes where density has been maximised with the result that there has been perceived regimentation and people felt oppressed by housing blocks conspicuously above traditional lower skylines as well as the absence of private open spaces, however small.</p>	<p>Comment noted. Code S04 requires all development proposals to preserve wildlife habitats, corridors and networks and this will include the Canal. Codes L05, L07 and L14 have been amended to require buildings to be set back from the Canal, including to avoid overshadowing of the Canal.</p> <p>Comment noted. The illustration has been amended slightly and the general building arrangement is considered to reflect a suitable concept example.</p> <p>Comment noted. The SPD includes codes for maximum building heights massing, frontages, amenity and provision of open space (etc), not just densities. In combination, these will help to ensure that Water Lane is redeveloped to provide a high quality new neighbourhood.</p>

Name	Organisation	Comment	Response
		<p>L05 – Northern canal, frontage (p. 72): Para 2, 1st sentence: Suggest an alteration to read, ‘Buildings must be set back from the Canal sufficiently to provide continuous access for management of the waterway as well as public access.’ This applies equally to all frontages along the Canal and could be incorporated in an additional panel.</p>	<p>Comment noted. Code S13 relates specifically to the Canal and requires development proposals to protect and maximise enhancement of the Canal, including in relation to its recreational and working industrial nature.</p>
		<p>L06 and L07 – Canal Basin zone (p. 74): The second paragraph of L06 is too woolly. In L07, line 3, we agree with a suggestion that ‘can’ should read ‘should’.</p>	<p>Comment noted. The existing text to codes L06 is considered appropriate. 60 Haven Road will set the maximum building line for development in this zone. Code L07 has been amended to clarify that development may follow the building line of 60 Haven Road on the Haven Road frontage, providing the historic limestone canal basin wall along this boundary is retained / incorporated in any development.</p>
		<p>L13 – Southern zone frontage (p. 78): See comments on L05 above.</p>	<p>Comment noted. Code S13 relates specifically to the Canal and requires development proposals to protect and maximise enhancement of the Canal, including in relation to its recreational and working industrial nature.</p>
-	Cilldara Group Exeter Ltd	<p>Building Heights 4.1 At L03 (p68) the draft SPD puts forward a building heights coding plan and this is broadly supported. However, it is considered that flexibility should be introduced to allow for taller buildings where this has an urban design justification through a full detailed design process, such as the marking of a key focal point/public space, where this is supported by Townscape Visual Impact evidence. It is therefore requested that appropriate wording is included to provide this flexibility for taller buildings.</p>	<p>Support noted and comment noted. Code L03 sets maximum general building heights but allows for some flexibility within this in terms of occasional taller buildings provided these can be justified by the applicant.</p>
		<p>Central zone, height, and massing 4.2 The draft SPD, at L08 (p75) requires frequent gaps to avoid an overbearing, continuous massing. The aim of this requirement is supported. However, the requirement for</p>	<p>Support noted and comment noted. However, the requirement for frequent gaps in block is considered necessary in order to avoid development that is overbearing in its massing.</p>

Name	Organisation	Comment	Response
		<p>continuous gaps is considered too restrictive and could result in gappy built form. The Cambridge example shown in the draft SPD achieves an attractive development through variation in height and form. We therefore request greater flexibility for the detailed design process and suggest: 'Proposals must avoid continuous, overbearing massing by incorporating variation in height and form and/or gaps in form.'</p>	
		<p>Southern zone, height, and Massing 4.3 L012 of the draft SPD relates to the southern zone. As above, we request greater flexibility for the detailed design process and suggest: 'Proposals must avoid continuous, overbearing massing by incorporating variation in height and form and/or gaps in form.' 4.4 L012 limits linking blocks to 4 storeys and again this is considered too restrictive, especially in view of the SPD's provision for buildings of up to 9 storeys here. We therefore request that greater flexibility is provided for the detailed design process and suggest: Lower linking sections between blocks may be acceptable provided that a varied and attractive skyline is achieved.</p>	<p>Comment noted. The requirement for frequent gaps in block is considered necessary in order to avoid development that is overbearing in its massing. Likewise the limitation relating to blocks of up to four storeys. Code L12 notes that a street height to width ratio above 1:1 may be acceptable, giving an appropriate level of flexibility.</p>
-	-	<p>P65 The text refers to co-living. It should be made clear that all provision of accommodation including co-living must comply with National Housing Standards. https://www.gov.uk/government/publications/technical-housing-standards-nationally-describedspace-standard</p>	<p>Comment noted. Code L15 states that homes must adopt the nationally described space standards – this includes co-living homes.</p>
		<p>L03, P68 The building heights are far too high. In particular the Southern zone is very narrow, and when the two cycle routes and Foundry Lane are located there will not be enough space for such high buildings.</p>	<p>Comment noted. The maximum building heights coded for in Code L03 are considered appropriate.</p>
		<p>L07 P74 Developments can follow the building line of 60 Haven Road. This should be changed to must</p>	<p>Comment noted. 60 Haven Road will set the maximum building line for development in this zone. Code L07 has</p>

Name	Organisation	Comment	Response
			<p>been amended to clarify that development may follow the building line of 60 Haven Road on the Haven Road frontage, providing the historic limestone canal basin wall along this boundary is retained / incorporated in any development.</p>
-	-	<p>L01- Suggest increase the density of the central zone to above 200dph to maximise the development potential and reduce the need for housing elsewhere.</p>	<p>Comment noted. The density of the Central Zone in code L01 is considered to be appropriate.</p>
		<p>L02-Street ratio proposals will limit density and may be unnecessary. There are lots of attractive streets with less than 1:1, some of which are world famous - look at Gandy St or the Shambles in York. The SPD is biased in showing an unattractive back alley with a bin compared to a shiny new development. Suggest the 1:1 ratio requirement is removed and replaced with wording/requirements on good design.</p>	<p>Comment noted. It is important to code for street ratios to ensure that building heights are proportionate to the width of streets, allow good light levels and do not result in overbearing buildings.</p>
		<p>L03-P68. Building heights. Looks good. Only concern is the 9-storey proposal on the southern zone. Would this be one of the tallest buildings in Exeter? I fully support high densities, but concerned this location may have an adverse impact on the natural setting of the River Valley Park. However, it is quite well shielded by the trees, and I think it's important for Water Lane to go for high density as this will also set expectations for the wider Marsh Barton regeneration. My house on Rivermead Road looks out on to the "southern zone" and may impact the view, but I'm more concerned by the potential impact on views and setting from ground level in the River Valley Park. The Valley Park is an outstanding natural asset for the city and this development needs to enhance it, not degrade it. On balance, I'm cautiously supportive of the 9-storey proposal if its designed well.</p>	<p>Support noted and comment noted. Code L03 sets a maximum general height of 6 storeys in the southern zone and has been amended to clarify that (only) occasional taller buildings of up to 9 storeys may be acceptable subject to robust justification by the applicant. Code M05 requires development proposals to retain and consider key views and the views from the Valley Park across the site to surrounding hills are given specific mention in the Views Framework Plan.</p>

Name	Organisation	Comment	Response
-	Exeter Civic Society	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.	Comment noted. Building density and heights are considered to be appropriately dealt with in the Design Code section of the 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.	Comment noted. The Council is satisfied that the amended Vision encapsulates the future of Water Lane, making clear that it will be both a dense and urban neighbourhood matched by an abundance of nature within all streets and spaces.
		'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').	Comment noted. Water Lane will be an urban neighbourhood that makes the most of its location close to the city centre, Canal and River. Page 65 has been amended to remove reference to kingfishers.
		'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 Works Place) there seems to be no gaps in the buildings line.	Comment noted. The illustration has been amended slightly and the general building arrangement is considered to reflect a suitable concept example.
		'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 ratio and residential density has been reached in an appendix to justify this.	Comment noted. This level of detail is not necessary for inclusion in the SPD and would lengthen it unduly.
		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	Comment noted. The Council considers that the approach to assessing and setting densities and heights in the SPD is appropriate and that code L01 sets appropriate density ranges for Water Lane.

Name	Organisation	Comment	Response
		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 for 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.	Comment noted. The Council considers that code L01 sets appropriate density ranges for Water Lane.
		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).	Comment noted. The illustration of the Canal Basin shows building up to 3.5 storeys taking the pitched roof in to account. The legend to code L03 has been amended to include approximate building heights. The maximum heights coded for in the southern zone are considered to be acceptable.
		'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.	Comment noted. The width of the carriageway along Water Lane will vary, as described in codes A15 and A17. However, code L11 has been amended to require a minimum of 75% of building frontages along Water Lane to be consistent. Code L01 codes for density ranges (including a maximum) by zone; and ratios are coded for in L02 codes. Maximum building heights are coded for in L03, by zone, with further details provided within the built form area codes L04 to L14.
		L05, Northern canal, frontage, p.72: it would help to define a minimum width of the canal path.	Comment noted. Code L05 sets clear parameters for the setback from 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	Comment noted. The first image on page 75 shows buildings well set back from existing houses.

Name	Organisation	Comment	Response
		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.	Existing community facilities are protected under existing (and emerging) planning policy and would need to be suitably replaced should they ever be redeveloped. The Welcome Café is outside the red line of the site. Code W02 shows areas of land adjacent to Gas Works Place for the provision of boat storage.
		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.	Comment noted. Code L07 provides for an adequate setback from the Canal of 3 metres to allow for widened public access. The image on page 76 is illustrative and not necessarily to scale. Code M03 requires development to respect the setting of nearby historic buildings.
		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.	Comment noted. There is no discrepancy. Code L03 sets maximum building heights for each zone (up to 6 storeys in the case of the Central Zone, with occasional allowance up to 8 or 9 where justified), whereas L08 is a more detailed design code that seeks to ensure avoid continuous horizontal massing above 5 storeys.
		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	Comment noted. However, the codes for the Southern Zone are considered to set appropriate parameters to ensure high quality development in this location.

Name	Organisation	Comment	Response
		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.	Support noted.
-	Haven Banks Residents' Group	There doesn't seem to be any mention in a code around buildings needing to be of high-quality design nor mention of the types of building materials which would be acceptable and unacceptable.	Comment noted. The need for buildings to be of high design quality is implicit throughout the SPD and, for example, is made clear in the overview in section 1.1 and Vision (and elsewhere throughout the document). Code L29 has been added to the SPD and states that matters such as materials and details are not coded for, but will be considered at the detailed planning application stage.
		Keep residential properties and commercial development separate (e.g. college and proposed retail development opposite Cotfield Street, Gabriel's Wharf and River Meadows) away from existing residential property.	Comment noted. Water Lane already contains different land uses in close proximity. Water Lane will be a mixed-use neighbourhood. The SPD (e.g. code L18) and existing policies in the Exeter Local Plan First Review and Core Strategy, seek to protect the amenities of existing residential properties.
		Include Passivhaus developments.	Comment noted. Under existing national legislation, the Council is unable to require development to meet Passivhaus standard. The SPD is as exacting as it can be under existing adopted national and local planning policies in terms of setting net zero requirements.
		Specify environmental standards for construction: Passivhaus; BREEAM system for sustainable homes - no default.	Comment noted. Where possible under existing adopted planning policy, codes within the SPD have been amended to provide greater clarity and/or specification.
		Infrastructure needs to be delivered in advance.	Comment noted. Due to the complex character of Water Lane, SPD does not include a phasing plan for delivery of infrastructure. However, as set out on page 25 of the SPD, the Council will be leading a collaborative process with all stakeholders and developers to ensure that infrastructure is delivered in a timely manner.

Name	Organisation	Comment	Response
		We need Design Codes which will help create a long-term mixed community.	Comment noted. Taken as a whole, the codes in the SPD seek to ensure that Water Lane is developed as a long term mixed community supported by the provision of facilities and employment.
		Can it be proved that sewers can cope?	Comment noted. The City Council will continue to work with South West Water to ensure that the sewage infrastructure at Water Lane is able to accommodate planned development. Additional text has been added to page 47 about the need for applicants for planning permission to engage with South West Water at an early stage.
		Design code needs to be enforced and developers must maintain quality.	Comment noted. The SPD has been prepared to ensure that Water Lane is developed as a high quality new neighbourhood.
		L01 Appropriate homes for the area are required, not an 'overbuild' of bedsits.	Comment noted. Bedsits are not identified in the SPD as appropriate types of housing at Water Lane. Code W06 requires Water Lane to provide a mix of housing catering for a broad demographic, taking into account local needs including for affordable housing.
		The density per hectare is too high.	Comment noted. The Council considers that L03 codes for appropriate density ranges at Water Lane.
		Where there are existing residential properties, is it not possible for the proposed new buildings to be 'in keeping' with existing properties in the areas/sites where development is proposed?	Comment noted. The heights and densities coded for in the SPD are considered to be appropriate for the redevelopment of Water Lane. Code L18 seeks to ensure that proposals respect the setting, daylight and amenity of existing residents; requires back-to-back distances between buildings and windows to be well considered; and requires building heights to generally be no more than two storeys higher than existing neighbouring development.
		The height and density (m2) of proposed new housing, along with floor space and parking spaces per property, should not be left to reserved matters; these are important	Comment noted. Planning legislation allows for design matters to be considered at reserved matters stage.

Name	Organisation	Comment	Response
		issues that should be agreed in the early stages of planning.	
		Site wide code: Refuse co-living due to the inadequate room sizes. There should be no sui generis development in this sensitive site.	Comment noted. Code L14 states that homes must adopt the nationally described space standards – this includes co-living homes. It is important that Water Lane is developed as a long-term and stable mixed community, but that does not negate the potential for co-living housing to be provided as part of overall the housing mix. Code W06 requires development to provide a mix of housing that caters for a broad demographic and takes account of local needs and states that housing typologies that are dedicated to a narrow demographic, such as co-living, must not dominate the area. The 2022 Exeter Local Housing Needs Assessment identifies that co-living housing offers opportunities for groups such as recent graduates to establish themselves in Exeter as an alternative to living in HMOs.
		L02 There is no mention of the ratio of Building Heights and distances at the rear of property boundaries. These should match the 1:1 ratio but be further displaced away from the rear of the property to its boundary, as if the existing property were actually built on its boundary.	Comment noted. Code L18 has been amended to clarify that back-to-back distances between buildings and windows must be well considered and agreed with the Council on a case-by-case basis.
		L03 Heights need to be in keeping with existing buildings and should be no more than one storey higher than adjacent (existing) buildings. The heights in the Haven Banks Retail Park should be limited to 4 storeys, rather than have an option for 6 stories, or at the very most 5 stories in the centre of the site away from its neighbours. This diagram conflicts with Section 4.2 Regulating Plan, and Section A02 Mobility Strategy Plan.	Comment noted. Code L18 states that building heights should generally be no more than two storeys higher than existing neighbouring development. This is considered to be an appropriate difference. The maximum heights provided for the Haven Banks Retail Park in code L03 are considered to be appropriate to its context. It is not apparent that the Building Heights Coding Plan conflicts with the Regulating Plan. The Mobility Strategy Plan has been replaced by an Active Travel Plan (code A02) and there is no apparent conflict between this Plan and the Building Heights Coding Plan.

Name	Organisation	Comment	Response
		L05 We do not agree that a reduced set back would be acceptable; two people should be able to comfortably pass each other.	Comment noted. Any reduced setback would still enable at least two people to comfortably pass each other. Code A28 requires options to be explored to widen the Canal towpath to accommodate cycle use, an increase in pedestrian users and the ability for people with mobility scooters (etc.) to safely pass other users.
		L06 No mention of the maximum height of the buildings in the area. We suggest a maximum of four storeys.	Comment noted. Maximum heights are coded for in L03 and are set at four storeys for the Canal Basin area.
		L07 Developments should be 8 metres away from the canal rather than just 3 metres, in line with main river allowance.	Comment noted. A minimum setback of 3 metres is considered acceptable to allow for widened public access.
		Do not like illustrations 1, 2 and 3 on Page 73, they all look like boxes.	Comment noted. The Council considers that illustrations 1 and 2 show acceptable approaches to design in the Northern Canal area. The 3 rd illustration clearly states that this would not be an acceptable approach.
		L09 Frontages – ‘active frontages’ is vague.	Comment noted. The term ‘active frontage’ is a well-established design term.
		Need to have specified set back (e.g. from canal).	Comment noted. Codes L05, L07, L09, L11 and L14 set clear parameters for building setbacks.
		Bike lockers for existing streets.	Comment noted. It is not possible to require S106 Agreements to remedy shortfalls within existing development. However, code A12 indicates that proposals should explore opportunities to provide secure cycle parking for existing residents.
		L10 Concern about building heights and massing. Need to be respectful of the city’s overall character, particularly in this historic quarter. Exeter should not become a facsimile of other cities and towns in the UK that have undergone regeneration (particularly in respect of waterside areas such as Bristol, Gloucester Docks, Exmouth etc.)	Comment noted. The City Council considers that the Development Framework and Design Code contained in the SPD, alongside emerging and existing planning policies in the Exeter Local Plan First Review, Exeter Core Strategy and Exeter Plan, will enable the delivery of high-quality development at Water Lane that is respectful of the city’s character.
-	Local residents	Keep residential properties and commercial development separate (e.g., college & proposed retail development	Comment noted. Water Lane already contains different land uses in close proximity. Water Lane will be a mixed-use

Name	Organisation	Comment	Response
	from the Haven Banks area	opposite Cotfield Street, Gabriel's Wharf and River Meadows) and existing residential property.	neighbourhood. The SPD (e.g. code L18) and existing policies in the Exeter Local Plan First Review and Core Strategy, seek to protect the amenities of existing residential properties.
		Include Passivhaus developments.	Comment noted. Under existing national legislation, the Council is unable to require development to meet Passivhaus standard. The SPD is as exacting as it can be under existing adopted national and local planning policies in terms of setting net zero requirements.
		Specify environmental standards for construction: Passivhaus, BREEAM, Code for sustainable homes - no default	Comment noted. Where possible under existing adopted planning policy, codes within the SPD have been amended to provide greater clarity and/or specification.
		Infrastructure needs to be delivered in advance.	Comment noted. Due to the complex character of Water Lane, SPD does not include a phasing plan for delivery of infrastructure. However, as set out on page 25 of the SPD, the Council will be leading a collaborative process with all stakeholders and developers to ensure that infrastructure is delivered in a timely manner.
		We need to create a long-term mixed community.	Comment noted. Taken as a whole, the codes in the SPD seek to ensure that Water Lane is developed as a long term mixed community supported by the provision of facilities and employment.
		Can it be proved that sewers can cope?	Comment noted. The City Council will continue to work with South West Water to ensure that the sewage infrastructure at Water Lane is able to accommodate planned development. Additional text has been added to page 47 about the need for applicants for planning permission to engage with South West Water at an early stage.
		Design code needs to be enforced and developers must maintain quality.	Comment noted. The SPD has been prepared to ensure that Water Lane is developed as a high-quality new neighbourhood.
		L01- Loathe: Need proper homes not bed sits.	Comment noted. Bedsits are not identified in the SPD as appropriate types of housing at Water Lane. Code W06

Name	Organisation	Comment	Response
			requires Water Lane to provide a mix of housing catering for a broad demographic, taking into account local needs including for affordable housing.
		Density per hectare is too high.	Comment noted. The Council considers that L03 codes for appropriate density ranges at Water Lane.
		Can't we just build 'in keeping' with existing properties (in areas/sites where development is proposed).	Comment noted. The heights and densities coded for in the SPD are considered to be appropriate for the redevelopment of Water Lane. Code L18 seeks to ensure that proposals respect the setting, daylight and amenity of existing residents; requires back-to-back distances between buildings and windows to be well considered; and requires building heights to generally be no more than two storeys higher than existing neighbouring development.
		Height and density of housing (m2) floor space / parking spaces per property should not be left to reserved matters - should be agreed at early stages of planning.	Comment noted. Planning legislation allows for design matters to be considered at reserved matters stage.
		Site wide code: Refuse co-living room sizes.	Comment noted. Code L14 states that homes must adopt the nationally described space standards – this includes co-living homes.
		L02-Like: Good daylight levels. People need light.	Support noted.
		L03-Heights need to be in keeping with existing buildings. No more than one story higher than adjacent buildings.	Comment noted. Code L18 states that building heights should generally be no more than two storeys higher than existing neighbouring development. This is considered to be an appropriate difference. The maximum heights provided for the Haven Banks Retail Park in code L03 are considered to be appropriate to its context.
		L05-No reduced set back (two people should be able to comfortably pass each other).	Comment noted. Any reduced setback would still enable at least two people to comfortably pass each other. Code A28 requires options to be explored to widen the Canal towpath to accommodate cycle use, an increase in pedestrian users and the ability for people with mobility scooters (etc.) to safely pass other users.

Name	Organisation	Comment	Response
		L06-No mention of the maximum height of the buildings in the area - recommend 4 stories maximum.	Comment noted. Maximum heights are coded for in L03 and are set at four storeys for the Canal Basin area.
		L07-Developments should be 8 meters away from canal rather than just 3 metres in line with main river allowance.	Comment noted. A minimum setback of 3 metres is considered acceptable to allow for widened public access.
		Do not like illustrations 1, 2 and 3 - all look like boxes.	Comment noted. The Council considers that illustrations 1 and 2 show acceptable approaches to design in the Northern Canal area. The 3 rd illustration clearly states that this would not be an acceptable approach.
		L09-Frontages - 'active frontages' is vague.	Comment noted. The term 'active frontage' is a well-established design term.
		Need to have specified set back (e.g., from canal).	Comment noted. Codes L05, L07, L09, L11 and L14 set clear parameters for building setbacks.
		Bike lockers for existing streets.	Comment noted. It is not possible to require S106 Agreements to remedy shortfalls within existing development. However, code A12 indicates that proposals should explore opportunities to provide secure cycle parking for existing residents.
		L10-Concern about building heights and massing.	Comment noted. The City Council considers that the Development Framework and Design Code contained in the SPD, alongside emerging and existing planning policies in the Exeter Local Plan First Review, Exeter Core Strategy and Exeter Plan, will enable the delivery of high-quality development at Water Lane that is respectful of the city's character.
		Need to be respectful of the Cities character. Exeter doesn't want to become a facsimile of other cities in the UK.	Comment noted. The City Council considers that the Development Framework and Design Code contained in the SPD, alongside emerging and existing planning policies in the Exeter Local Plan First Review, Exeter Core Strategy and Exeter Plan, will enable the delivery of high-quality development at Water Lane that is respectful of the city's character.

Name	Organisation	Comment	Response
-	Green Party	<p>L01 Building density has been expressed in a crude way in order to assert that high density living is both possible and desirable. It should also include, in this policy, expectations about minimum room sizes for all properties, the mix of properties themselves and include measures such as habitable rooms per hectare.</p> <p>Given that this density is higher and up to double that of Exeter city centre, very careful consideration should be given to the nature and extent of the high-density areas. As part of the lead explanation, there should be an expectation about amenity space, both internal and external. Are the open spaces included in the calculations? This should be stated in the policy. Government guidance refers:</p> <p>“Dwellings per hectare, used in isolation, can encourage particular building forms over others, in ways that may not fully address the range of local housing needs. For example, an apartment building containing one person studios could deliver significantly more dwellings per hectare, but significantly fewer bedspaces per hectare, than a terrace of family-sized townhouses on a similarly sized site. It is therefore important to consider how housing needs, local character and appropriate building forms relate to the density measures being used.</p>	<p>Comment noted. Code L15 states that homes must adopt the nationally described space standards – this includes co-living homes. Code W06 requires development to provide a mix of housing that caters for a broad demographic and takes account of local needs and states that housing typologies that are dedicated to a narrow demographic, such as co-living, must not dominate the area. The supporting text to the Building Density codes (page 67) is clear that the density ranges are based on net site area which includes consideration of infrastructure and services directly associated with the use of the buildings, including access roads, private garden space, open space and private car parking. The SPD also includes codes for building heights, plot ratios, frontages and massing. Taken as a whole, and alongside emerging and existing planning policies in the Exeter Local Plan First Review, Exeter Core Strategy and Exeter Plan, the City Council considers that the SPD will enable the delivery of high-quality development at Water Lane.</p>
		<p>The Southern zone has an inappropriate maximum number of 220 dwellings per hectare. If this is compared to, for example the New England quarter in Brighton, then these would need to be very tall buildings with very small rooms or student blocks/co-living. High densities are going to require excellent design and given that the southern zone is quite a long way from the central hub the design</p>	<p>Comment noted. The density range for the southern zone coded for in L01 is considered to be appropriate. The design principles in the SPD will be applied across Water Lane.</p>

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		principles would have to be severely diminished to achieve this level of density.	
		The allocation of the Northern and Southern Canal zone to some of the highest density properties will be problematic with regards to potential overshadowing of the Canal basin which will be detrimental, and unacceptable, to nature.	Codes L05 and L13 require buildings to be setback in order to avoid over shading of the Canal. Code S13 is clear that development must protect and maximise enhancement of the Canal as County Wildlife site and code S024 is clear that development proposals must preserve wildlife habitats (e.g. the Canal).
		L02 The street ratio needs to address the ‘canyon effect’ and the layouts proposed in the design code will suggest very grid like layouts and buildings which could increase this effect. More variety and interest is needed.	Comment noted. Taken as a whole, the design codes in the SPD will ensure that Water Lane is developed to a high standard of design.
		L03 There needs to be a maximum height here referencing the baseline height, above which it should be no higher. The height must not overshadow the Canal in any way and there must not be gated access to residential areas. There should be a reference to the green infrastructure framework to provide a context for the setback and this should be specified as a requirement to create an accessible and pleasant canal side infrastructure.	Comment noted. Code L03 has been amended to include baseline maximum heights. Codes L05, L11 and L13 require buildings to be setback in order to avoid over shading of the Canal. Codes L05, L07 L11, L13 require buildings to be setback from the Canal to allow for continuous/widened public access; it is not considered necessary to refer specifically to green infrastructure in this context. Code A05 is clear that gated developments will not be permitted.
		Given the high-density requirements it is likely that most of the buildings in the southern zone are going to have to be 9 stories. Which is unacceptable.	Comment noted. This is not considered to be the case. Code L03 sets maximum heights and is clear that robust justification must be provided to exceed these.
		Exeter has been a “low rise city”, how does this accord with this current policy given the SPD will be adopted before the new local plan?	Comment noted. Policy DG1 of the Exeter Local Plan First Review states that development should be at a density which promotes Exeter’s urban character and policy CP4 of the Exeter Core Strategy states that residential development should achieve the highest appropriate density compatible with the protection of heritage assets, local amenities, the character and quality of the local environment and the safety

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			and convenience of the local and trunk road network. The maximum densities coded for in L03 are compatible with this existing policy framework.
		On the matter of height: The policy says that the new building shouldn't be higher than two stories to that of the adjacent property. Please can the policy point be added that the new building shouldn't be higher than two stories of the lowest adjacent property.	Comment noted. The wording of code L18 sufficiently covers this point.
		L04. Building should be avoiding being just in a grid shape. See comments elsewhere for the northern canal aspect. Buildings must not overshadow the canal.	Comment noted. The final layout of streets and buildings will be a matter of detailed design at planning application stage. Code L5 states that buildings must be set back from the Canal to provide continuous public access and avoid over shading.
		L05. The buildings must not overshadow the canal; 'avoid' is too weak a word. Setback is not acceptable as priorities must be given to green infrastructure. The new Canal Bridge should align with pathways on the Valley parks opposite; this could align with the pathway which runs along New Haven field as this already has a desire line path which joins up to the cycle path.	Comment noted. The terminology used in code L05 is considered suitable as a means to safeguard the Canal and to ensure continuous public access. The design of the new Canal bridge will be determined by a feasibility study, as set out in code A27, located to improve access to the Riverside Valley Park from the Water Lane area.
		L06. The canal basin height should be no higher than Maritime Court behind it. The access points to the harbour front have been removed so that there is very little space either side of the access into the water, space is needed around the slipway. The buildings are too high to be this close to the Canal basin. It will increase the canyon effect and overshadow the basin further increasing the pollution in the water. The buildings need to be set back so that there is a viable space between the buildings and the basin edge for the manoeuvring of boats and people. This is a really poor design.	Comment noted. Maximum heights are coded for in L03 and are set at four storeys (approximately 14.5 metres) for the Canal Basin area. This is considered to be an appropriate height for the area's location and context, including Maritime Court.
		L08. This is not clear by what is meant by 'a perimeter block form of development'. Heights over five stories will	Comment noted. The glossary has been amended to include a definition of 'perimeter block form'.

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		not be acceptable. Otherwise, it reads to be ... if it isn't 'continuous development', it could be as many stories as desired by the developer.	
-	Sport England	<p>a. L05 - Sport England fully support the emphasis around building frontages to include many entrances and site of the pedestrian paths to support safety and security within the Water Lane development.</p> <p>b. Sport England would like to highlight the need to consider safety in this SPD. Safety of spaces and routes can be ensured through natural surveillance from surrounding buildings, adequate and appropriate lighting, clear visibility, and design (see page 12 Activity for All of AD3)</p>	<p>Support noted.</p> <p>Comment noted. The SPD has been amended through the inclusion of a new code for designing out crime (code L28) which relates to matters such as natural surveillance, lighting etc. These matters are also picked up in some other codes, including A24 (main site access), S02 (open space), S13 (Canal), A09 (primary mobility hub functions) and A10 (secondary mobility hub).</p>
-	Historic England	<p>L01 – Building density. This code is closely linked with building heights and will have implications for the character of the area and for impacts on the settings of heritage assets including significant views. We are therefore concerned that proposals are not supported by evidence in the form of a views study and/or a Heritage Impact Assessment (HIA).</p> <p>L03 – Building heights. This associated code is accompanied by a coding plan with which proposals are expected to comply unless there is a 'robust justification', while also making allowances for taller buildings in certain areas. It is currently unclear what the impact of these building heights will be on the character of the canal as a non-designated heritage asset, or on the settings of designated heritage assets including those on the Quay and on views from</p>	<p>Comment noted. The Council has undertaken further technical work to assess the impact of proposed maximum heights upon key views/heritage assets. Based on the evidence provided by this assessment, Historic England considers that the SPD is unlikely to result in significant effects on the historic environment that would trigger the need for Strategic Environmental Assessment. A proportionate Heritage Impact Assessment is being prepared for all sites proposed for allocation in the emerging Exeter Plan, including Water Lane, and this will be published in due course. The SPD has not been amended to code for materials and details. However, as new code (L29) has been added to clarify that matters that will be considered at detailed planning application stage will include material and detail, as well as a range of other detailed matters (e.g., articulation, composition, windows).</p>

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		<p>Grade II* listed Colleton Crescent etc. For example, would a 9-storey building break the skyline in views from Colleton Crescent and impact on the relationship between the built area of Exeter and its landscape setting / surrounding hills in this view? We therefore consider that this code needs to be supported by evidence, which could form part of a wider study into appropriate buildings heights/densities that is informed by a robust understanding of local character and significant views, and/or an HIA for the SPD and associated Local Plan site allocation. Historic England has prepared guidance on tall buildings which would be relevant. We also provide guidance on proportionate HIA as a five-step process within our guidance on The Historic Environment and Site Allocations in Local Plans. This will be particularly important if the document is to be adopted as policy.</p> <p>L04 – L13 – height, massing etc. for Northern, Central and Southern Zone. Please see our comments on L01 and L03.</p>	
-	-	Where continuous massing is unavoidable to achieve higher DPH, living walls should be mandatory to reduce the overbearing feel.	Comment noted. Codes L04, L08, L11 and L13 seek to avoid design with a continuous overbearing massing.
-	-	L06-L07: L02 states that building height should be at most a 1:1 ratio yet the proposals suggest 3-4 storey buildings along the canal basin on top of storage for boats. Haven Road is narrow here and I cannot see how L06 and L07 can possibly comply with this 1:1 ratio. It would be an oppressive edifice that would block out sunlight for that stretch of Haven Road as well as hide evidence if boating from view. Whereas boating, water sports and public access to the waterfront should be at the heart of designs around the canal basin. I do agree with keeping the	Comment noted. Code L04 sets a maximum building height for the Canal Basin area of up to 4 storeys (approximately 14.m). This is in line with the ratio coded for in L02. Code L06 is clear that the building roof form of development at the Canal Basin should be varied and relate to the historic warehouses.

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		<p>roofline in keeping with the historic warehouse style but could something also be said to ensure housing isn't just boxes. It would be deleterious to the canal basin if the new buildings were bland square boxes akin to the frontage of the education centre opposite.</p>	
		<p>L01 - the building density and plot ratio around the canal basin appears too great. It would be useful to see what the existing density and plot ratio is for the surrounding existing housing to enable a comparison between proposals and existing homes covered by the strategy.</p>	<p>Comment noted. The City Council considers that the density ranges and plot ratios coded for in L01 and L01 are appropriate and will result in a high quality of urban design.</p>
		<p>L04 - I would add that taller buildings, or parts of buildings, should be further from the water's edge, such as in the second illustration.</p> <p>In broader terms, I am in favour of buildings that have varied height and form set well back from the water's edge. There are examples around Exeter of cuboid buildings being built, such as the new St Leonard's Quarter, that seem devoid of architectural merit. I wonder if the codes could also incorporate a figure for what percentage of the area could be given to a single developer to prevent a homogenous estate.</p>	<p>Comment noted. Code L05 is clear that buildings must be set back from the Canal to provide continuous public access and avoid over shading the Canal. It is not within the gift of the SPD to require landowners to apportion their land between different developers. Codes L04, L08, L11 and L13 require built form to vary in height and have frequent gaps to avoid an overbearing continuous massing.</p>
-	-	<p>3.Liveable Buildings</p> <p>General: The design code includes a high number of words such as 'maybe', 'possibly' and 'unless', especially with regard to density and height, giving developers every opportunity to go against the guidelines.</p>	<p>Comment noted. Where possible under existing adopted planning policy, codes within the SPD have been amended to provide greater clarity and/or specification.</p>
		<p>Viability</p> <p>This chapter also states that there is 'opportunity for an applicant to argue a case for non-compliance'. IN SUMMARY: The code is not the code and developers are</p>	<p>Comment noted. The SPD must accord with viability policy set out in the National Planning Policy Framework. The local planning authority cannot deviate from this policy.</p>

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		specialised in finding workarounds, which questions the 'implementability' of the design code.	
		Street Ratio L02 This should be 1: 1 with no exceptions.	Comment noted. Code L02 is clear that a ratio of 1:1 will be supported and sets clear parameters for where development may go beyond this. The wording is considered to be appropriate. A fixed ratio of 1:1 would lead to uninteresting and unvaried development.
		Building Heights L03, L04 and L12 A higher number of lower and more widely-spaced buildings should be specified, especially along the front of the Northern Canal Zone and the Southern Zone, thereby retaining the recreational value of the Canal Area.	Comment noted. The heights and densities specified by codes L01 and L03 are considered to be appropriate to Water Lane's urban context. Code S13 is clear that development must protect and maximise enhancement of the Canal as a recreational corridor.
		Plot Ratio The document states: ' proposals above the maximum plot ratio may be acceptable where there are non-residential ground floor podiums and it can be demonstrated....' This is another example of exceptions being 'offered'. Raised ground floors also increase the overall building height, when the height is simply expressed in storeys.	Comment noted. Code L02 is clear that a ratio of 1:1 will be supported and sets clear parameters for where development may go beyond this. The wording is considered to be appropriate.
-	-	L03 Building Heights: The diagram at the top of the page purports to show the benefit of a variety of building heights. It also shows that the proposed allowable heights are twice as high as existing ones. The existing ones already dominate the view westwards. I consider it unacceptable to allow buildings higher than three stories adjacent to the Canal.	Comment noted. The image at the top of page 69 is an photo of a development in London showing a good height to width ratio. It does not show the height of proposed or existing development at Water Lane. Code L18 is clear that development should generally be no more than two storeys higher than existing neighbouring development. Code L03 sets a maximum building height in the Canal Basin area of 4 storeys/approximately 14.5 metres and this is consider to appropriate.
		L07 Canal basin, frontage: The character of the Canal Basin would be change irrevocably if such buildings (shown as for stories high) were permitted. The lack of a wide space adjacent to the canal poses problems launching long	Comment noted. A maximum build height of four storeys is considered to be appropriate to the Canal Basin area given its location and context. Code W02 has been amended to show 62 Haven Road as a site for residential-led development, with

Name	Organisation	Comment	Response
		rowing boats. A more sensitive development would focus on water sports - and not on accommodation in this area.	an opportunity for water-related uses fronting the canal basin (e.g., at ground level).
-	-	1. Should take into account provision for sheltered retirement accommodation with warden facilities.	Comment noted. Code W06 makes specific mention of the need in Exeter for homes for older people, including extra care housing (based on evidence of need provided by Devon County Council), and requires applicants to liaise and collaborate with relevant local authorities to explore how development at Water Lane can best support this need.
		2. All buildings should not be too high i.e., not over 3 storeys, as this will cut out light in the area.	Comment noted. The heights coded for in L03 are considered acceptable and in line with the Council's intention to ensure that Water Lane is developed as a high quality new neighbourhood. Codes L08 and L13 seek to ensure that the provision of sufficient light to streets; codes L16 and L17 set minimum standards for daylight provision to new homes; and code L18 requires proposals to respect the daylight of existing residents.
		3. The density of accommodation appears to be very high for all areas	Comment noted. The densities coded for in L01 are considered acceptable and in line with the Council's intention to ensure that Water Lane is developed as a high quality new neighbourhood.
-	-	L01 – if townhouses could be used as a 'bridge' between the existing 2 or 3 storey buildings and any new higher ones it would ease the impact considerably both visually and for the residents of the existing houses.	Comment noted. Code L18 is clear that development should generally be no more than two storeys higher than existing neighbouring development; and that development must respect the setting, daylight and amenity of existing residents.
		L02 – illustrates up to 5 stories but what would it look like for the 9 – 12 that are already being proposed by developers?	Comment noted. Code L03 is clear that the maximum height for taller buildings is 9 storeys and that these must be of exceptional quality and robustly justified.
		L05 – buildings cantilevered over paths need to have proper maintained guttering to avoid soaking users below (unlike the very unpleasant path leading from Commercial Road to Cricklepit Bridge).	Comment noted. To be of exceptional quality, as required by code L05, a building would need to include appropriate guttering.

Name	Organisation	Comment	Response
		L06 + L07 – very good, this should help to make it visually appealing.	Support noted.
		L13 – all good sense.	Support noted.
		General: Are the headings and text supposed to be built ‘form’ or ‘from’? the words seem to be interchangeable in several instances.	Comment noted. A document search did not identify any references to “built from”.
		The proposal is called Liveable Buildings but really only deals with the outside – how about inside? People need access to upper floors, somewhere to dry laundry, doorways and corridors large enough for all e.g., double prams, wheelchairs etc.	Comment noted. Code L15 requires homes to meet the nationally designed space standards. Code L20 encourages residential development to be designed to meet Building Regulations M4(2) accessible and adaptable dwelling standards, with wheelchair housing provide as part of a development housing mix to meet Building Regulations M4(3) wheelchair user standard.
		Where is the social housing?	Comment noted. The Council already has a planning policy which seeks 35% affordable housing from developments of 10 or more homes, contained in the Exeter Core Strategy. This will continue to be applied, until it is replaced by a similar policy in the new Exeter Plan.
		Example illustrations (both photos and graphics) all have very straight lines, where are the interesting rooflines and feature brickwork?	Comment noted. The photos and graphics show examples of high and low quality development and acceptable and unacceptable design.
-	-	L03 - Nine storey buildings are way too high IMO. They are far too obtrusive.	Comment noted. Code L03 is clear that the maximum height for taller buildings is 9 storeys and this only in the Southern Area. Such buildings must be of exceptional quality and robustly justified.
-	-	No to Water Lane development, it should be 4 storeys high not 9 storeys. And the same goes for any of the proposed developments. No to Exeter city centre becoming more and more like a huge conglomerate of densely populated blocks of flats.	Comment noted. Code L03 is clear that the maximum height for taller buildings is 9 storeys and this only in the Southern Area. Such buildings must be of exceptional quality and robustly justified. The City Council considers that a Development Framework and Design Code contained in the SPD, alongside emerging and existing planning policies in the Exeter Local Plan First Review, Exeter Core Strategy and

Name	Organisation	Comment	Response
			Exeter Plan, will enable the delivery of a high-quality new neighbourhood at Water Lane.
-	-	L03 - Building heights of up to 9 Stories are far too high to be proposed in the Southern Zone. This should be restricted to between 5-6 stories as a maximum - ideally 4 stories would be better. Having buildings near to 100 FT (30 metres high) in this area is far too high, in my opinion.	Comment noted. Code L03 is clear that a maximum height of 9 storeys will only be permitted if the building is of exceptional quality and robustly justified. The City Council considers that a Development Framework and Design Code contained in the SPD, alongside emerging and existing planning policies in the Exeter Local Plan First Review, Exeter Core Strategy and Exeter Plan, will enable the delivery of a high-quality new neighbourhood at Water Lane.
-	Union4 Planning	<p>The recognition that densities may be higher in development where there is a larger number of small or single person units is important to ensure that such developments optimise the use of finite brownfield land. Density in itself is not an issue, and providing there are no knock-on environmental impacts of this density, then it is suggested that a density limit is not always necessary.</p> <p>In terms of Street Ratios, it is recognised that buildings can exceed the 1:1 ratio for small sections, however it should be recognised that where streets are of generous width, the street ratio measure becomes less important as the sense of enclosure and canyoning is lessened.</p> <p>Whilst the building heights Coding Plan gives a good idea of the approximate location of certain building heights, this should not preclude buildings coming forward, taller than identified on the Plan, where it can be demonstrated that they have no amenity or environmental impact and where they work to improve the appearance and setting of the site, particularly around entrance points.</p>	<p>Comment noted. Code L01 provides density ranges and is clear that proposals should align with the ranges unless robust justification can be provided for an alternative arrangement.</p> <p>Comment noted. The wording to code L02 is considered to provide an appropriate amount of flexibility.</p> <p>Comment noted. Code L03 is clear that proposals should follow the building heights coding plan unless robust justification is provided for an alternative arrangement. Taller buildings, as defined in the accompanying coding plan, must be of exceptional quality.</p>
-	-	On the whole you have produced some good guidelines but is it absolutely necessary to build these Soviet-style	The City Council considers that a Development Framework and Design Code contained in the SPD, alongside emerging

Name	Organisation	Comment	Response
		<p>soulless blocks of living accommodation (prepared by architects). They are out-dated building design and have enormous environmental detriment i.e. carbon footprint to erect carbon footprint to pull down. Give people a design that they will find joy + produce in living in promoting community spirit and be a pleasure to look at for passers-by. There are some excellent being produced such as the Dutch Docklands development (Borneo Sporenweg) that could be used as an example. We really love our city and we do not want it turned into a concrete jungle just for the sake of money-oriented developers.</p>	<p>and existing planning policies in the Exeter Local Plan First Review, Exeter Core Strategy and Exeter Plan, will enable the delivery of a high-quality, low carbon and well-designed new neighbourhood at Water Lane.</p>
-	Exeter Community Centre Trust	<p>L01 - L13 Variety in heights of building, rejection of overbearing and massing is welcomed in the codes and must be rigorously enforced. 9 stories anywhere even on canal front seems too high. Again, as in W3 and W6 comments, ensure some provision is made for residents only parking and disabled parking.</p>	<p>Support noted and comment welcomed. Code L03 is clear that the maximum height for taller buildings is 9 storeys and that these must be of exceptional quality and robustly justified. These buildings will also be required to meet all other relevant codes in the SPD, together with existing adopted planning policies in the Exeter Local Plan First Review and Core Strategy relating to (e.g.) design and amenity. Code A11 (car parking) is clear that blue badge spaces can be provided within predominantly car free areas and codes A14 and A19 provide for blue badge parking along Water Lane (the street) and the Neighbourhood Street. Water Lane is to be redeveloped as a low car neighbourhood supported by high quality active travel and public transport infrastructure, allowing car parking to be minimised. Code A11 sets a suitable average of 1:5 parking to dwelling ratio.</p>
-	-	<p>Just concerned about heights of buildings around Cotfield Street and others like it with small, terraced homes, we don't want to be left literally in the shade!</p>	<p>Comment noted. Code L18 is clear that development should generally be no more than two storeys higher than existing neighbouring development; and that development must respect the setting, daylight and amenity of existing residents.</p>

Q22. Do you have any comments on the Liveable Buildings codes L14-L24?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	L24 – Non-residential ground floors (p. 83): It should be noted that workshop frontages will need to be fully openable if required, and accessible. In the 5th bullet point in the list, ‘under croft’ should be ‘undercroft’. Comments on the uses of non-residential ground floors are included elsewhere in this response.	Comment noted. Code L27 does not refer to workshop frontages and it is not considered necessary to do so. The text has been amended to “undercroft”.
-	-	L16, P80 The text refers to co-living. It should be made clear that all provision of accommodation including co-living must comply with National Housing Standards. https://www.gov.uk/government/publications/technical-housing-standards-nationally-describedspace-standard	Comment noted. Code L15 states that homes must adopt the nationally described space standards, including co-living homes.
-	Exeter Civic Society	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.	Comment noted. Code L18 has been amended to state that back-to-back distances between buildings and window locations should be well considered and agreed with the Council on a case-by-case basis.
		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).	Comment noted. The wording in code L18 in respect of building height differences is considered appropriate.
-	Haven Banks Residents’ Group	L14 No small hotel style housing attracting transient population rather than community. Housing space standards appear to be only 'guidance' - not enforced. Housing space standards - need specific figures not guidance.	Comment noted. It is important that Water Lane is developed as a long-term and stable mixed community. Code W06 requires development to provide a mix of housing that caters for a broad demographic and takes account of local needs and states that housing typologies that are dedicated

Name	Organisation	Comment	Response
			<p>to a narrow demographic, such as co-living, must not dominate the area. The 2022 Exeter Local Housing Needs Assessment identifies that co-living housing offers opportunities for groups such as recent graduates to establish themselves in Exeter as an alternative to living in HMOs. Code L14 states that homes must adopt the nationally described space standards – this includes co-living homes. The standards are set out in Planning Practice Guidance and are specific figures applied by the City Council.</p>
		<p>L15 Not enough consideration (although presumably, the minimum requirement for one habitable room to receive sunlight all day, is dependent upon the layout of each individual liveable units and the amount of windows it contains).</p> <p>Consideration also to be given to the impact on solar panels installed on existing properties affected by the development (currently based on BSS codes set each on the Spring Equinox Day).</p>	<p>Comment noted. The requirements of code L15 are considered appropriate. Code L18 has been amended to state that new development should not have a significant impact on the energy-generating ability of existing solar panels on neighbouring properties.</p>
		<p>L16 Outside decks must be only supplementary to open space amenity provision.</p>	<p>Comment noted. Decks will not count toward open space provision under code S02.</p>
		<p>L17 When considering the importance of sunlight in terms of existing residential properties (not just the proposed newbuilds), it makes sense that the heights of the newbuild properties should be no more than those of the existing neighbouring developments.</p> <p>Shading of Exeter Canal by five- or six-storey buildings has the potential to create a detrimental impact on its ecology.</p> <p>We think this needs to be more explicit in specifying the</p>	<p>Comment noted. The requirements of code L18 seek to ensure that proposals respect the setting, daylight and amenity of existing residents, including in terms of building heights. The wording in code L18 in respect of building height differences is considered appropriate. Codes L05, L11 and L13 require buildings to be setback from the Canal to avoid overshadowing.</p>

Name	Organisation	Comment	Response
		<p>'two stories higher' rule is based on the height of the stories of existing buildings or needs to put a limit on how high a storey can be. Does an overly high top-floor with a mezzanine count as one storey or two, for example.</p>	
		<p>L18 Given the potential close proximity of external noise emitters, are the current proposals to mitigate environmental noise pollution really adequate? Mandatory installation of acoustic treatment should be considered, to ensure the maximum of 45dB(A) from(?) adjoining apartments.</p>	<p>Comment noted. The Council's Environmental Health Team is satisfied that codes within the SPD relating to noise are appropriate.</p>
		<p>L21 Good to ensure adequate storage for bikes and kayaks etc.</p>	<p>Support noted.</p>
		<p>L22 If floor levels are raised, how will the developer ensure flood risk upstream isn't increased, given the current flood risk in existing areas is significant? (NB: No properties in the River Meadows/Water Lane areas are occupied, due to a known surface/pluvial flood risk.)</p> <p>This only covers small level changes, generally less than a metre. What if the level change is over a metre. It does not consider what should happen where a ground level change combined with a step up to a further raised ground floor is required. There should be a code which states that this situation would then counts as a storey for the purposes of L17.</p>	<p>Comment noted. Design measures will be necessary to ensure that development doesn't increase the flood risk elsewhere, as required by code Q15. Code L28 provides design guidance for where it is not possible to locate residential uses at ground floor level, even with raised ground floors.</p>
		<p>L24 Ensure adequate lighting of public areas. Should something be added to this code to bolster the second bullet point in S02; the last paragraph, and bullet points, in S13; and the first bullet point in C02? Water drainage – Presumably this is adequately addressed in S06 and doesn't need addressing further here.</p>	<p>Comment noted. A new code has been added to the SPD on designing out crime, under which matters such as lighting of public areas will be considered. Lighting of public areas is also covered in other codes, including S02 and S13. Code L24 covers non-residential ground floor uses and drainage matters are addressed elsewhere in the SPD (S06).</p>

Name	Organisation	Comment	Response
-	Local residents from the Haven Banks area	L14-No small hotel style housing attracting transient population rather than community. Housing space standards appear to be only 'guidance' - not enforced. Housing space standards - need specific figures not guidance.	Comment noted. It is important that Water Lane is developed as a long-term and stable mixed community. Code W06 requires development to provide a mix of housing that caters for a broad demographic and takes account of local needs and states that housing typologies that are dedicated to a narrow demographic, such as co-living, must not dominate the area. The 2022 Exeter Local Housing Needs Assessment identifies that co-living housing offers opportunities for groups such as recent graduates to establish themselves in Exeter as an alternative to living in HMOs. Code L14 states that homes must adopt the nationally described space standards – this includes co-living homes. The standards are set out in Planning Practice Guidance and are specific figures applied by the City Council.
		L15-Not enough consideration - one habitable room with sun light. Plus impact on existing solar panels. Currently based on BSS codes on the Spring Equinox Day.	Comment noted. The requirements of code L15 are considered appropriate. Code L18 has been amended to state that new development should not have a significant impact on the energy-generating ability of existing solar panels on neighbouring properties.
		L16-Outside decks must be only supplementary to open space amenity provision.	Comment noted. Decks will not count toward open space provision under code S02.
		L17-Building heights should be no more than existing neighbouring developments. Shading of canal by 5 or 6 story buildings. Impact on ecology.	Comment noted. The requirements of code L18 seek to ensure that proposals respect the setting, daylight and amenity of existing residents, including in terms of building heights. The wording in code L18 in respect of building height differences is considered appropriate. Codes L05, L11 and L13 require buildings to be setback from the Canal to avoid overshading.
		L18-Does this protect people sufficiently from noise nuisance? Mandatory acoustic treatment to provide no more than 45 dBa in adjoining apartments.	Comment noted. The Council's Environmental Health Team is satisfied that codes within the SPD relating to noise are appropriate.

Name	Organisation	Comment	Response
		L21-Good to ensure adequate storage for bikes and kayaks etc.	Support noted.
		L22-If floor levels are raised how can we ensure flood risk upstream isn't increased. Flood risk on existing areas is significant now. No property occupation (in River Meadows/Water Lane) due to known surface / pluvial flood risk.	Comment noted. Design measures will be necessary to ensure that development doesn't increase the flood risk elsewhere, as required by code Q15.
		L24-Ensure adequate lighting of public areas (no mention of it anywhere).	Comment noted. A new code has been added to the SPD on designing out crime, under which matters such as lighting of public areas will be considered. Lighting of public areas is also covered in other codes, including S02 and S13.
		Water drainage - how is it addressed	Comment noted. Drainage matters are addressed in code S06.
-	Green Party	<p>L14. is welcome, this must apply to all living accommodation.</p> <p>Is co-living is described as 'housing', as co-living is referred to in L15? If it is not then it should say that PBSA need not have to meet the nationality described space standards, which is doesn't; but Co-living should - as bedsits. Co-living should not be included on the site as there will be plenty of provision in the city centre. Co-Living will increase the transient nature of the community and given that flats and blocks are difficult, places to create community in this will make that harder still.</p>	Support noted and comment noted. Code L15 has been amended to state that homes must adopt the nationally described space standards, including co-living homes. It is important that Water Lane is developed as a long-term and stable mixed community, but that does not negate the potential for co-living housing to be provided as part of overall the housing mix. Code W06 requires development to provide a mix of housing that caters for a broad demographic and takes account of local needs and states that housing typologies that are dedicated to a narrow demographic, such as co-living, must not dominate the area. The 2022 Exeter Local Housing Needs Assessment identifies that co-living housing offers opportunities for groups such as recent graduates to establish themselves in Exeter as an alternative to living in HMOs.
		L10/11. It would be helpful to say that buildings won't be built in square blocks and actual designs may incorporate the shaped buildings in order to provide interest.	Comment noted. Codes L05, L11 and L14 seek to ensure a varied built form. A new code, L29, has been added to the SPD, explaining the design matters to be considered at detailed planning application stage (how the building meets

Name	Organisation	Comment	Response
		<p>L17. There should be minimum distances between buildings and window locations set out as recent planning applications have pushed the boundaries too far in terms of ignoring minimum requirements. The ratio between new buildings and existing buildings should be increased. So, it is not appropriate to suggest that it should be on a case-by-case basis, Otherwise, there was no basis for the planning committee to refuse if necessary.</p> <p>Building heights should generally be no more than two stories higher than existing neighbouring development is really not clear about what is the neighbouring development? Is that the adjacent block or properties in Haven Banks? This is too vague and unworkable for decision makers.</p>	<p>the ground and sky; composition; windows; articulation; and material and detail).</p> <p>Comment noted. Code L18 has been amended to state that back-to-back distances between buildings and window locations should be well considered and agreed with the Council on a case-by-case basis. The requirements of code L18 seek to ensure that proposals respect the setting, daylight and amenity of existing residents, including in terms of building heights. The wording in code L18 in respect of building height differences is considered appropriate.</p>
		<p>L19 /20 Why is there no standard set out for Lifetime Homes that can be adapted? And what minimum percentage lifetime adaptable / accessible housing is going to be provided. Will there be lifts as a requirement in blocks so that wheelchair users can access all floors. Nothing is mentioned in any policy section about lifts, many of the tall flats in the area do not have lifts. If co-living must be considered, then it is not appropriate for co-living rooms to be considered suitable spaces for a home office.</p>	<p>Comment noted. Building Regulations standards are national standards. The Government has consulted on mandating all new homes to be built to standard M4(2) as a minimum (subject to site specific constraints) and the outcome of this consultation is awaited. Policy H12 of the emerging Exeter Plan sets out the requirements for the proportions of accessible homes that the Council would like to see on new developments, although this policy is not yet adopted. Requirements for the provision of lifts in buildings is set at a national level. Co-living developments will be expected to provide an appropriate amount of communal space including work/office space.</p>
		<p>L21 The storage space does not consider items like buggies and pushchairs which would be needed to be available on</p>	<p>Comment noted. Buggies etc may be stored at ground floor level, but code L15 also requires housing to follow the</p>

Name	Organisation	Comment	Response
		<p>landings near to a resident's front door. There also needs to be storage for domestic refuse.</p> <p>L22 This should include something about raised ground floors not having any step access to them. Otherwise, wheelchair users may not be able to escape in a flood. Refuges may need to be provide.</p> <p>L23 There is no policy here or elsewhere on designing out crime and community safety, this should be a consideration in the policy.</p> <p>Each access point to have its own letter box and system to contact the resident.</p> <p>Affordable housing must be provided in accordance with Exeter City Council's policy on affordable housing. I.e., 35%. This is above the guidance for brownfield sites of 20%. However, given this is guidance, it is appropriate to apply the Council's own affordable housing policy.</p>	<p>nationally described space standards. Storage will be provided for domestic refuse.</p> <p>Comment noted. Code L22 requires development to ensure step free access from the public realm to the raised ground floor.</p> <p>Comment noted. A new code has been added to the SPD on designing out crime. Every self-contained dwelling is provided with a letter box/front door. Code W06 specifically references the need to provide affordable housing as part of the mix. In line with policy CP7 of the Core Strategy, officers will continue to seek 35% affordable housing from developments of 10 or more homes, or (in the case of build to rent schemes), 20% affordable private rent housing in accordance with national Planning Practice Guidance.</p>
-	Sport England	<p>L21 – Sport England are satisfied that emphasis is given to provide cycle storage. The requirements listed however only relate to residential development. It is important to also include other uses, including employment and leisure. Requirements for secure cycling storage and other associated cycle infrastructure e.g., showers and lockers should also be included in the requirement lists for non-residential uses (see section 8.2 of AD3).</p>	<p>Comment noted. Cycle parking for all uses is specifically addressed in code A12. The supporting text on page 61 refers to workplace travel plans and the provision of secure workplace cycle parking and associated infrastructure would be considered as part of this, secured via the Council's existing Sustainable Transport SPD.</p>
-	-	<p>Buildings next to existing developments should be allowed to be staggered starting from the same height as the neighbouring property, up to 2 storeys above the neighbouring property. This will enable a higher dph to be achieved.</p>	<p>Comment noted. The wording in code L18 in respect of building height differences is considered appropriate.</p>

Name	Organisation	Comment	Response
-	-	L21 - it is good that the plan is considering secure storage for items other than bicycles, but I feel this could be strengthened from "should explore" to "should include".	Comment noted. The wording in code L24 is considered appropriate.
-	-	I support high density development and I don't have a problem with the buildings being tall, but I'd like to see a requirement for houses to have good size rooms, able to support good quality of life - especially if people are working from home. Is this L14? I include co-living spaces in the need for people to have enough space in their home (and not just the communal space). I welcome "Developments should avoid long narrow corridors and provide a maximum of 8 homes per stair and lift core." (L16) and storage space (L19).	Support noted and comment noted. Code L15 has been amended to clarify that homes, including co-living homes, must adopt the nationally described space standards.
-	-	1. L17 - New buildings should be no higher than 1 storey about existing buildings in the neighbourhood.	Comment noted. The wording in code L18 in respect of building height differences is considered appropriate.
-	-	L14 – which should be room enough to live comfortably.	Comment noted. The nationally described space standards are national (Government) standards intended to ensure that room sizes are sufficient to allow a good level of amenity.
		L15 & L16 – good.	Support noted.
		L17 – most important not to destroy existing residents' quality of life.	Comment noted. The requirements of code L18 seek to ensure that proposals respect the setting, daylight and amenity of existing residents
		L18 – and noise while the building work is going on.	Comment noted. Code Q09 has been amended to require development to minimise noise pollution at all stages of development.
		L19 – how will wheelchair users exit the buildings in an emergency if lifts are not functioning and no residential areas are on ground floor level?	Comment noted. Development will be required to comply with national building regulations in respect of emergency access and egress.
		L20 & L21 – all good ideas.	Support noted.

Name	Organisation	Comment	Response
		L22 – most important not to increase flood risk to existing areas, it's hard enough to get house insurance as it is.	Comment noted. Codes Q15 and L25 seek to ensure that flood risk to existing areas does not increase as a result of development.
		Street frontages heading before L23 is a repeat of that before L22.	Comment noted. Codes L25 and L26 both come under the "Street Frontages" heading.
		L23 – agree, it is important for people to know the boundaries.	Support noted.
		L24 – attractive frontages benefit everyone.	Support noted.
-	-	L17 (Relationship with existing buildings) does not seem consistent with L03 (which states that in the Southern zone, taller buildings of up to 9 stories may be acceptable). L17 seems much more sensible that those stated in L03, which seem far too tall.	Comment noted. Code L18 is considered to be consistent with code L03.
-	Union4 Planning	The recognition that dual aspect would not be readily achievable across all units in student accommodation and co living development is sensible and is strongly supported. It is also agreed that communal spaces within such buildings should be dual aspect, as suggested.	Support noted.
-	Exeter Community Centre Trust	L14 -L24 - It should be part of the design code that access to floors above ground floor should be accessible by lift, not just stairways.	Comment noted. Development will be required to comply with national building regulations in respect of the provision of lifts.
-	-	Lots of good stuff there. Would like to see input to reduced weather use impact, that I haven't heard come up at consultation. The developers had not put any thought to this previously, other than standard plumbing measures for low flow appliances and fixtures. Is there an opportunity to use some leading design standards around water conservation at the macro level too, e.g., grey water use?	Support noted and comment noted. Resource use (including in relation to water) is coded for in section 4.2 of the SPD.
-	-	So in our street there are different height buildings already entering it terraced houses two stories, flats at the end by the canal 4 storeys and three storeys which would classify and dictate the height of surrounding new developments?	Comment noted. Code L18 is clear that building heights should generally be no more than two storeys higher than existing neighbouring development. It is amended to state that a height difference greater than two storeys may be

Name	Organisation	Comment	Response
			acceptable when buildings are side-to-side and there is a gap between frontages.

Q24. Do you have any comments on the Active Streets codes A01-A02?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	<p>Active streets (Transport uses, access and movement pp. 84-114)</p> <p>Road patterns and usages should assist the requirements of activities and destinations, not determine their existence. For example, access and usage proposals in the draft SPD predetermine the closure of the Gabriel's Wharf maritime and operational facility, with consequential and detrimental impact on the safety, capacity, and functionality of the Canal. Once lost, functionality will be blocked off for generations. Access for cranes, lorries, and trailers across the open places for people as far as the waterside at Gabriel's Wharf and the Canal Basin is a necessity. We expressed our concerns about Water Lane Road layout and access in our response to the Water Lane outline planning application and repeat them here.</p>	<p>Comment noted. The mobility strategy coded for in section 4.5, including the roads and their functions, focuses on promoting active travel and active streets. Code W11 has been amended to state that Gabriel's Wharf is required to safeguard a craning point and vehicle access for articulated lorries and a crane.</p>
		<p>We wish also to emphasise the following in this response:</p> <ul style="list-style-type: none"> • Tow paths are slow lanes for walking (or towing boats!). Widening them for sharing with cycles and e-scooters is not a satisfactory answer. We support establishing a fast cycle traffic corridor to Marsh Barton Station, separated from pedestrians and slow movers. • The mobility codes should address the inevitable conflict and danger as a result of the large increase in cycling and e-mobility traffic coming from the development into the city along the side of the River past the Canal Basin where it is flat, and over Cricklepit Bridge to the Quay. 	<p>Comment noted. The SPD does not support a fast segregated cycling route through Water Lane as this is not considered necessary. New code A02 accords with Devon County Council's LCWIP by showing a cycle route/feeder route running along Water Lane and code A15 explains that this will be the main active travel route through the site. Code A28 also requires options to be explored to widen the Canal towpath to accommodate cycle use and an increase in pedestrian use. Code A02 has been amended to clarify that segregation of users will be sought in accordance with Local Transport Note 1/20 and where space in the carriageway</p>

Name	Organisation	Comment	Response
		<ul style="list-style-type: none"> The impact on pedestrians using Trews Weir footbridge needs to be considered. 	allows. Code A30 identifies the Trews Weir Bridge as an off-site connection in need of improvement that development proposals should support.
-	Cilddara Group Exeter Ltd	<p>Mobility Strategy</p> <p>5.2 A Mobility strategy plan is included within the draft SPD (A02, p87). This shows a primary street running alongside the canal to Clapperbrook Lane. The environment here transitions to a more open rural character and the route becomes very narrow alongside the existing solar farm. There is therefore a need for greater clarity on the character of primary streets and the need for flexibility to allow for variation in character along the length of primary streets. We therefore request that the SPD is amended to introduce this clarity and flexibility.</p>	Comment noted. The Mobility Strategy code has been amended to an Active Travel Plan (code A02), which now shows the connection along the Canal as a street where active travel will be prioritised. Codes A15 to A23 have been amended to provide greater clarity as to the function of primary streets.
-	-	Entire development should be car free. There is no rationale to support car use here. Streets should be open to vehicles at set times for deliveries only. The Exeter Transport Strategy and Net Zero 2030 goals are extremely ambitious and should be reflected here.	Comment noted. The Council does not consider it appropriate that Water Lane should be entirely car free. For example, car access to the area will still be required to support tourism, leisure activities and the planned new primary school and to serve existing residents and businesses. The Mobility Strategy in the SPD does, however, seek to minimise the need to travel by car to Water Lane, which will enable car parking provision to be similarly minimised. The primary mobility hub (code A09) requires provision for cycle parking and code A12 states that cycle parking must be provided in line with current Government best practice and prioritised over car parking. Code A11 sets a low average parking to dwelling ratio across the site of 1:5.
-	Exeter Civic Society	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	Support noted and comment noted. The Regulating Plan, which includes details about the location of primary and other streets, has been moved to the front of the SPD. Off-site connectivity is considered to be appropriately dealt in the SPD (code A30).

Name	Organisation	Comment	Response
		<p>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.</p> <p>There are four main problems which are not addressed appropriately in the street layout:</p> <p>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,</p>	<p>Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access into/from Water Lane described by the SPD accord with this Vision and are supported by Devon County Council.</p>

Name	Organisation	Comment	Response
		<p>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.</p> <p>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.</p> <p>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.</p> <p>4) All roads on the site are to be fully adopted roads. By not</p>	<p>Use of the Tan Lane underpass will be restricted to public transport, cyclists and pedestrians.</p> <p>Comment noted. The SPD does not support a fast segregated cycling route through Water Lane as this is not considered necessary. New code A02 accords with Devon County Council's LCWIP by showing a cycle route/feeder route running along Water Lane and code A15 explains that this will be the main active travel route through the site. Code A28 also requires options to be explored to widen the Canal towpath to accommodate cycle use and an increase in pedestrian use.</p> <p>Comment noted. The SPD does not promote unviable bus routes. Code A04 has been amended to show a single potential bus route through the Water Lane site, with a further route along the Canal and over Clapperbrook Lane to be safeguarded (including through the safeguarding of land) to allow provision in future should this be viable.</p>

Name	Organisation	Comment	Response
		<p>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.</p> <p>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.</p> <p>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.</p> <p>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).</p> <p>The mobility coding plan referred to in A02 is to be found under A11, not A03.</p> <p>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).</p> <p>This code and code A01 should be in the framework chapter.</p>	<p>Comment noted. Page 26 of the SPD explains that adoption of streets by the local highway authority is preferred, in accordance with Devon County Council advice. Code Q17 has been amended to clarify the approach to managing and maintaining areas and infrastructure at Water Lane if these are not adopted. Page 88 has been amended to remove reference to Water Lane being Exeter's first low car neighbourhood.</p> <p>Comment noted. Code A02 has been amended to new codes A02 (Active travel plan) and A03 (Vehicle access plan) and reference to primary and secondary streets etc has been removed. Code A03 is clear that the route from Gabriel's Wharf to the solar farm will have vehicle access limited to existing properties and facilities. The Code A02 has also been amended to refer to the correct codes. It is considered that codes A01 and A02 are appropriately placed within the SPD.</p>

Name	Organisation	Comment	Response
-	Haven Banks Residents' Group	Mandate and enforce LTN (Local Transport Note) 1/20, the government's definitive national standard for cycling infrastructure design in the UK	Comment noted. Codes A02, A05, A07 and A21 require active travel infrastructure to be designed in accordance with Local Transport Note 1/20 guidance.
		A01 Not feasible in the short or medium term. Additional access/egress is required, not just the Haven Road/Alphington Road junction.	Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access described by the SPD accord with this Vision. Use of the Tan Lane underpass will be restricted to public transport, cyclists and pedestrians. Use of Clapperbrook Bridge will be restricted to local traffic (e.g., accessing Bromham's Farm and the Double Locks), cyclists and pedestrians and is also safeguarded for potential future public transport provision.
		Quality connected walking and cycling routes required to support active travel (in accordance with LTN 1/20). Separate cycle routes from pedestrian ones. Maybe this is covered sufficiently by A03?	Comment noted. Code A02 is clear that the design of cycle routes will depend upon traffic volumes and carriageway width and will need to accord with Local Transport Note 1/20 guidance.
		Bus stop locations need to be specified.	Comment noted. The location of bus stops will be addressed at planning application stage. Code A04 is clear that bus stops must be provided.
		Bus shelters need to be specified - rather than just stops.	Comment noted. Code A04 is clear that bus stops must have shelters.
		A02 A16 contradicts A02: Haven Road must not be a primary route.	Comment noted. Code A02 has been amended to show Haven Road as a route that prioritises active travel.
		Cycle infrastructure must be built in tandem with development phases.	Comment noted. The City and County Councils will seek to ensure that cycle infrastructure is delivered alongside development.
		Change location of main 'through route road' to railway side (not canal).	Comment noted. Code A02 has been amended to new codes A02 (Active travel plan) and A03 (Vehicle access plan) and reference to primary and secondary streets etc has been removed. Code A03 is clear that the route from Gabriel's Wharf to the solar farm will have vehicle access limited to existing properties and facilities.

Name	Organisation	Comment	Response
		Keep major roads away from residential zones	Comment noted. There will be no major roads in Water Lane, which will be a low car neighbourhood.
		Consideration needs to be made to locations outside of Exeter, i.e., how will visitors get here and how will residents and businesses get out.	Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood supported by high quality active travel and public transport infrastructure, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access into/from Water Lane described by the SPD accord with this Vision and are supported by Devon County Council. Visitors and residents will still be able to enter and leave the Water Lane site using a car.
		How will visitors get to and park in the new developments (and existing facilities such as the Quay)?	Comment noted. The SPD seeks to encourage visitors to travel to Water Lane by active travel and public transport where possible. Haven Banks Car Park 1 is to be retained, as shown on the Development Framework, and provides for visitor parking. Code A12 requires provision of secure enclosed cycle parking for visitors, of an amount that reflects needs.
		We are concerned about the impact on traffic flows at the Alphington Road/Haven Road junction - especially regarding access to businesses, and access by emergency vehicles.	Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access into/from Water Lane described by the SPD accord with this Vision and are supported by Devon County Council.
-	Local residents from the Haven Banks area	Mandate and enforce LTN 120 (Government bike route standard).	Comment noted. Codes A02, A05, A07 and A21 require active travel infrastructure to be designed in accordance with Local Transport Note 1/20 guidance.
		A01-Not feasible in short or medium term. Additional access/egress required. Not just Haven Road Alphington Road junction.	Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access described by the SPD accord with this Vision. Use of the Tan Lane underpass will be restricted to public transport, cyclists and pedestrians. Use of Clapperbrook Bridge will be

Name	Organisation	Comment	Response
			restricted to local traffic (e.g., accessing Bromham's Farm and the Double Locks), cyclists and pedestrians and is also safeguarded for potential future public transport provision.
		Quality connected walking and cycling routes required to support active travel.	Comment noted. New code A02 provides an active travel plan containing connected active travel routes through Water Lane. Codes A27 to A30 require development proposals to improve active travel connections beyond the red line of the site boundary.
		Separate cycle routes from pedestrian ones.	Comment noted. Code A02 is clear that the design of cycle routes will depend upon traffic volumes and carriageway width and will need to accord with Local Transport Note 1/20 guidance.
		Bus stop locations need to be specified.	Comment noted. The location of bus stops will be addressed at planning application stage. Code A04 is clear that bus stops must be provided.
		Bus shelters need to be specified - rather than just stops.	Comment noted. Code A04 is clear that bus stops must have shelters.
		A02-A16 contradicts A02. Haven Road must not be a primary route.	Comment noted. Code A02 has been amended to show Haven Road as a route that prioritises active travel.
		Cycle infrastructure must be built in tandem with development phases.	Comment noted. The City and County Councils will seek to ensure that cycle infrastructure is delivered alongside development.
		Change location of main 'through route road' to railway side (not canal).	Comment noted. Code A02 has been amended to new codes A02 (Active travel plan) and A03 (Vehicle access plan) and reference to primary and secondary streets etc has been removed. Code A03 is clear that the route from Gabriel's Wharf to the solar farm will have vehicle access limited to existing properties and facilities.
		Keep major roads away from residential zones.	Comment noted. There will be no major roads in Water Lane, which will be a low car neighbourhood.
		Consideration needs to be considered to locations outside of Exeter.	Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood supported by high quality active travel

Name	Organisation	Comment	Response
			and public transport infrastructure, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access into/from Water Lane described by the SPD accord with this Vision and are supported by Devon County Council. Visitors and residents will still be able to enter and leave the Water Lane site using a car.
		How will visitors get to and park in the new developments (and existing facilities such as the Quay).	Comment noted. The SPD seeks to encourage visitors to travel to Water Lane by active travel and public transport where possible. Haven Banks Car Park 1 is to be retained, as shown on the Development Framework, and provides for visitor parking. Code A12 requires provision of secure enclosed cycle parking for visitors, of an amount that reflects needs.
		Impact on traffic flows Alphington Road/Haven Road junction - especially on businesses, fire engine and ambulance access.	Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access into/from Water Lane described by the SPD accord with this Vision and are supported by Devon County Council.
-	Sport England	Active Streets – (Linked to AD3 principles 2 - Walkable communities, 3 - Providing connected active travel routes, 6 - high quality streets and spaces and 5 - network of multi-functional open spaces) a. A01 - Sport England fully support the mobility strategy where an emphasis is given to the hierarchy of travel for walking and cycling first.	Support noted.
		b. A02 – Sport England would like to emphasise the importance of the bus routes, active travel routes and footpaths are in place prior to the first residential unit being completed. This will ensure that options for	Comment noted. The City and County Councils will seek to ensure that public transport and active travel infrastructure is delivered alongside development.

Name	Organisation	Comment	Response
		alternative modes of transportation are in place for residents and behaviour change is possible.	
		c. A02 – when looking at the mobility strategy plan, consider how filtered permeability could be included in the design process, this could be included on the secondary streets to slow down traffic and create a connected active travel route (see section 2.3 of AD3).	Comment noted. Code A02 is clear that the design of cycle routes will depend upon traffic volumes and carriageway width and will need to accord with Local Transport Note 1/20 guidance.
-	-	This is very ambitious, I like it, well done and thank you! If only this was adopted 30 years ago :)	Support noted.
-	-	Mobility Strategy Plan A02 The map does not clearly show where general vehicles are permitted. Black circles show access points for vehicles, which includes Haven Road, but it is not clear whether this is access for residents only or general access, which would make the narrow Haven Road a thoroughfare for car traffic, then turning into Michael Browning Way. Haven Road along the Canal Basin should be closed to general traffic with access-only for residents.	Comment noted. Code A02 has been replaced by new codes A02 and A03 which more clearly show the active travel and vehicle access functions of roads. Code A02 is now clear that Haven Road is not suitable for general vehicle access for new development.
-	-	A02: The map fails to distinguish between Primary and Secondary routes (both are shown in the same colour). In any event, it is important that main routes are not alongside the canal and that there should be two incoming/outgoing routes to this development	Comment noted. Code A02 has been amended and no longer shows primary and secondary routes. It also shows that the existing route along the Canal will prioritise active travel. Water Lane is to be redeveloped as a low-car neighbourhood supported by high quality active travel and public transport infrastructure, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access into/from Water Lane described by the SPD accord with this Vision and are supported by Devon County Council.
-	-	A01 - happy with the overall strategy - but clearly lots of careful planning will be needed to make this work for all residents and visitors!	Support noted.

Name	Organisation	Comment	Response
		A02 - very hard to agree or disagree with the road plan for the whole area like this. Need to see the detail.	Comment noted. Code A02 has been amended, replaced by new code A02 showing a more detailed active travel plan for the area and code A03 showing a more detailed vehicle access plan.
-	-	I strongly support this as a low car development. I am pleased to see that Water Lane is retained as a primary through route for active travel. Better routes across the river will be essential - Trews Weir suspension bridge and the alley between Cricklepit Bridge and Commercial Road are not capable of taking much increase in traffic.	Support noted and comment noted. Code A30 requires development proposals to support improvements to key off-site active travel links such as Trews Weir Bridge and connections to Cricklepit Bridge.
-	-	A01- The proposal makes a lot of assumptions 1. walking, cycling or public transport is the "natural choice" is misguided.	Comment noted. Walking, cycling and public transport can be the natural choice for many people. The SPD seeks to enable delivery of the active travel and public transport infrastructure needed to support a low car development.
		2.Exeter has an extremely poor and unreliable public transport system which until the flat £2 fare was very expensive. There are no electric bikes for hire and no cars clubs. This went into liquidation recently and I am not confident that this would be reinstated.	Comment noted. The City Council will continue to work with active travel and public transport providers to encourage improved provision in Water Lane and throughout the city.
		3. There seems to be an idea that people in the city work in the city. Exeter is a major conurbation hub with many people travelling long distances to work and need a car to get to work or to carry out there work. Devon is vast and it is not possible for most people to do their job or get around without a car. My job involves travelling to sites all over Devon every day and this cannot be achieved by bike or public transport.	Comment noted. Water Lane will be a low car neighbourhood supported by high quality active travel and public transport infrastructure. The site is already well served by two train stations in close proximity. Water Lane may particularly appeal to people who wish or are happy to use active travel and public transport to access their daily needs, including for employment. Code A11 is clear that parking rights will be safeguarded for existing residents.
		3. What about older people with limited mobility or health conditions, the disabled and people with young children who need to get from A to B reliably, promptly and safely.	Comment noted. New development at Water Lane may particularly appeal to people who wish or are happy to use active travel and public transport to meet their daily needs, including for employment. However, the SPD also addresses the needs of people with disabilities and limited mobility

Name	Organisation	Comment	Response
			(etc.) in a number of ways including: codes A04 and A05, which require bus stops, streets and paths to be designed inclusively; and code A10 which requires secondary mobility hubs to be accessible for those with disabilities. Code A09 has been amended to ensure that the primary mobility is designed to be accessible for those with disabilities. Code A12 requires cycle parking to be designed to accommodate child carriers and mobility scooters.
		4. Active streets are not safer for people walking alone at night.	Comment noted. An active street is one that is likely to be well used and therefore safer due to natural surveillance. The SPD has been amended through the introduction of a new code on designing out crime (L28), which seeks to ensure that development is designed to reduce the opportunities for crime and anti-social behaviour.
		5. Residents should be able to park their cars near their homes or this is an unreasonable restriction on private life.	Comment noted. Water Lane will be redeveloped as a low car neighbourhood with minimum car parking for new residents. Code A11 is clear that parking rights will be safeguarded for existing residents.
		6 Electric bikes and cargo bikes are expensive and are unaffordable for most residents in the city.	Comment noted. The City Council will continue to work with potential cycle hire operators to ensure that cycle hire options are affordable.
		A02. The mobility hub. What is this and what will be provided?	Comment noted. Codes A08 and A09 sets out the parameters for a and functions of the primary mobility hub.
-	-	It is very true that "It's easy to move around on foot, by bike and by public transport within Water Lane and to get to the rest of the city" but this is only if the person is fit and able, doesn't have heavy laptops to take to work, doesn't have a week's shopping, isn't with toddlers etc.	Comment noted. New development at Water Lane may particularly appeal to people who wish or are happy to use active travel and public transport to meet their daily needs, including for employment. However, the SPD also addresses the needs of people with disabilities and limited mobility (etc.) in a number of ways including: codes A04 and A05, which require bus stops, streets and paths to be designed inclusively; and code A10 which requires secondary mobility hubs to be accessible for those with disabilities. Code A09 has

Name	Organisation	Comment	Response
			<p>been amended to ensure that the primary mobility is designed to be accessible for those with disabilities. Code A12 requires cycle parking to be designed to accommodate child carriers and mobility scooters.</p>
		<p>The objective of low car ownership is fine, but people then have to rely on deliveries thus increasing larger vehicle activity in the area such as vans and lorries.</p>	<p>Comment noted. Code A09 codes for the provision of a delivery hub with parcel collection as part of the primary mobility hub.</p>
-	-	<p>There is NO provision for any disabled access. Clearly none of the people who devised this dream vision need the help of others every day. I cannot walk well. How do you get a scooter on a bus? That's a diesel bus!</p>	<p>Comment noted. Enabling people with disabilities to access Water Lane is very important and is considered in a number of codes. A non-exhaustive list includes: code A05 which, as part of the general requirements for the design of streets and junctions, requires that proposals adopt an inclusive approach which considers the needs of vulnerable users from the outset; code A10 which requires secondary mobility hubs to be accessible for those with disabilities; and codes A11, A17 and A19 which code for the provision of blue badge car parking. Code A09 has been amended to require the primary mobility hub to be accessible for those with disabilities.</p>
-	Exeter Cycling Campaign	<p>This is a supplementary comment from the Exeter Cycling Campaign. Our full set of comments has been collated into a pdf and previously emailed.</p> <p>We would ask that a traffic volume forecast / estimate it carried out for the site, and particularly for Water Lane. The Southern part of Water Lane is designated as giving priority to active travel. The design of this road to give priority to active travel will be dependent on the forecast vehicle volumes.</p> <p>If the vehicle volume is forecast as below 2000 vehicles a day, then our preference would be to treat this road as the Dutch do their rural roads: with wide, different-coloured</p>	<p>Comment noted. Code A02 has been amended to clarify that this section of Water Lane will prioritise active travel and new code A03 explains that vehicle access will be limited to existing properties and businesses. The design of cycle routes will depend upon traffic volumes and carriageway width and will need to accord with LTN 1/20 guidance.</p>

Name	Organisation	Comment	Response
		cycle paths on each side and a narrow vehicle path in the centre.	
-	-	A01 - Public transport is not an option for many people, because it is unreliable.	Comment noted. The City Council will continue to work with active travel and public transport providers to encourage improved provision in Water Lane and throughout the city.
		The language used in this document is full of jargon and would be better understood if it were to be written in plain English.	Comment noted. The SPD has been amended through the expansion of the glossary.

Q26. Do you have any comments on the Active Streets codes A03-A10?

Name	Organisation	Comment	Response
-	Cilddara Group Exeter Ltd	<p>Strategic Flood Event Access and Egress</p> <p>2.17 The draft SPD (p93) shows two options for a strategic route linking from the north to the proposed Foundry Lane within Water Lane South and from there across the railway to the 'high-line- at Marsh Barton. One route follows the former railway line northward across Water Lane towards Haven Banks and the other connects from the Water Lane North gasworks site, across Water Lane to Foundry Lane, just to the north of the Electricity Distributions Site.</p> <p>2.18 The route along the former railway line is shown in the draft SPD in a position that would further squeeze the development area at the northern end of the Cilddara land ownership. This route would also need to be raised substantially to cross Water Lane because of ground levels in this area and would require a raised route along the back</p>	<p>Comment noted. The illustration on page 99 shows an indicative route for the strategic flood access and egress route and the accompanying text is clear that the detailed and final solution will be determined by the Flood Access and Egress Study being prepared by consultants for the Council, with the involvement of stakeholders including the Environment Agency and key landowners at Water Lane (including Cilddara). It is considered unnecessary to define the terms fixed and indicative.</p>

Name	Organisation	Comment	Response
		<p>of residential properties on Monitor Close/Chandlers Walk, potentially resulting in significant impacts on residential amenity. This raised route would be isolated from the immediate area, with inherent potential public safety concerns, and would necessitate a number of step/ramped points of access to make it accessible along its length impacting on financial and spatial viability.</p> <p>2.19 We therefore object to the to the 'former railway egress route option' as shown because this implies a raised route to the rear of residential properties on Monitor Close/Chandlers Walk, lacking safety and security and takes further land from the northern end of the Water Lane South, which in combination with the wider access proposals would prejudice delivery and viability.</p> <p>2.20 The other route, connecting from Foundry Lane to Water Lane North via a link just north of the Electricity Distribution Site is supported.</p> <p>2.21 In addition to these principal comments, the following general comments is made: the meaning of Fixed Location and Indicative Location should be defined. Because of the high-level nature of the SPD it needs to be made clear that fixed locations are not precise and have a locational tolerance of, say, +/- 20m.</p> <p>2.22 Comments on other elements of the draft SPD are set out in the following chapters, using the draft SPD headings.</p>	

Name	Organisation	Comment	Response
-	-	A03, P87 Transport As currently set out the entire site will be gridlocked very quickly, within weeks of construction starting. It needs a link to Marsh Barton via the road next to the new station, and via a Tan Lane tunnel, even if these are only for cars. The whole site needs some flow of traffic.	Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access described by the SPD accord with this Vision. Use of the Tan Lane underpass will be restricted to public transport, cyclists and pedestrians. Use of Clapperbrook Bridge will be restricted to local traffic (e.g., accessing Bromham's Farm and the Double Locks), cyclists and pedestrians and is also safeguarded for potential future public transport provision.
		A04, P89 Foundry Lane needs to continue to Marsh Barton station: it can be the cycling motorway as well.	Comment noted. The SPD does not identify a cycling commuter route and it is not proposed to create a segregated cycle lane adjacent to the railway line. New code A02 shows an LCWIP route/feeder route running along Water Lane and code A15 explains that this will be the main active travel route through the site. Code A28 also requires options to be explored to widen the Canal towpath to accommodate cycle use and an increase in pedestrian use. Code A02 has been amended to clarify that segregation of users will be sought in accordance with Local Transport Note 1/20 and where space in the carriageway allows.
		A08, P92 The pictures do not show secure cycle parking. It needs to be enclosed, and with separate security per property. Cycles can cost £000s and theft is rife, so good security is essential.	Comment noted. The photo on page shows an example of secure cycle parking. Code A12 is clear that cycle parking must be secure and enclosed.
-	-	A04-The bus route (part through the development) looks indirect and not commercially viable. Has ECC engaged with stagecoach on this?	Comment noted. The indicative bus route shown in the Public Transport Plan on page 93 has been identified in light of discussions with Stagecoach and Devon County Council.
		A05-There should be no need for a multi-storey car park in this location. A big expensive building the city doesn't need	Comment noted. Codes A05 and A06 for the primary mobility hub no longer make provision of public car parking.

Name	Organisation	Comment	Response
		and shouldn't pay to maintain. Why is parking being provided for a local primary school next to a train station and nearby busy bus routes?	However, it is likely that the new primary school will require some car parking for staff and this is reflected in W04.
		A08-Should be car free. Do not specify minimum parking standards as this will limit density.	Comment noted. The Council does not consider it appropriate that Water Lane should be entirely car free. Car access to the area will still be required to support tourism, leisure activities and the planned new primary school and to serve existing residents and businesses. Delivering a large low-car neighbourhood at Water Lane will be a significant achievement.
		A09-Cycle parking standards for the Water Lane area should be specified, including provision (circa 5% of spaces) for non-standard cycles such as accessible cycles and cargo cycles.	Comment noted. Code A09 is clear that cycle parking must be provided in line with current government best practice, with the requirements of all types of cycles and users considered.
-	Exeter Civic Society	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.	Comment noted. Code A02 has been amended to clarify that the design of cycle routes will depend upon traffic volumes and carriageway width and will need to accord with LTN 1/20 guidance.
		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.	Comment noted. Code A05 is clear that gated developments will not be permitted.
		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	Comment noted. The indicative bus route shown in the Public Transport Plan on page 93 has been identified in light of discussions with Stagecoach and Devon County Council. The existing bus link through Marsh Barton is shown on the Plan.

Name	Organisation	Comment	Response
		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).	Comment noted. One primary mobility hub is a suitable and viable number for a site the size of Water Lane. A secondary mobility hub close to Marsh Barton station will provide a good range of active travel functions and support the station’s role as a multi-modal interchange.
		A05 Mobility Hubs: The illustration should show cycle parking as part of the yellow part of the building.	Comment noted. The illustration on page 96 has been amended accordingly.
		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?	Comment noted. Replacing public car parking currently provided for at Haven Banks Car Parks 2 and 3 is no longer a proposed function of the primary mobility hub. It is proposed that Haven Banks Car Park 1 will be retained for public car parking. The supporting text to code W05 identifies car parking for those who bring their own water-related equipment as an improvement that could make the Canal more attractive for users and this could be brought forwards under code W05. Code W12 provides for a modest new car park at Clapperbrook Hub to support leisure use in that area.
		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.	Comment noted. Code A010 is clear that secondary mobility hubs can be combined with consolidated residential parking where suitable, which could include cycle parking. Code A12 requires cycle parking to be provided in convenient locations near the front door.
		A08 Car Parking: Different from A09 which mentions cycle parking for visitors, they are not dealt with in A08. The	Comment noted. The term “Allocated car parking” covers parking for (e.g.) residents and their visitors. A parking ratio

Name	Organisation	Comment	Response
		<p>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.</p>	<p>of 1:5 is considered appropriate. The Council will continue work to secure alternative and improved active travel across the city. Visitor parking to the Water Lane area will also continue to be provided for at Haven Banks Car Park 1.</p>
		<p>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.</p>	<p>Comment noted. Code A12 is clear that, as a low car neighbourhood, the need for cycle parking is likely to be higher than the minimum standard. One space per residents is considered to be an appropriate potential requirement. Devon County Council will be consulted on all planning applications made at Water Lane.</p>
		<p>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.</p>	<p>Comment noted. The detailed final solution for the provision of the strategic flood access and egress route will be determined by the Flood Access and Egress Study being prepared by consultants for the Council, with the involvement of stakeholders including the Environment Agency and key landowners at Water Lane. The high-line may provide one solution.</p>
-		<p>A03 Compulsory purchase of large areas of land (e.g., Water Lane) means that roads can be moved.</p>	<p>Comment noted. Compulsory purchase and the moving of roads is extremely expensive and can have significant viability</p>

Name	Organisation	Comment	Response
	Haven Banks Residents' Group		implications for development. The Council considers that the road layout provided for in the SPD is appropriate.
		A02. The plans do not clearly differentiate between primary and secondary routes (same colour).	Comment noted. Code A02 has been amended to new codes A02 (Active travel plan) and A03 (Vehicle access plan) and reference to primary and secondary streets etc has been removed.
		Haven Road must not be a primary route, as multiple leisure and hospitality venues will result in pedestrian crossings.	Comment noted. Code A03 has been amended to clarify that Haven Road is not suitable for general vehicle access for new development and that it is identified in the LCWIP for reduced traffic speeds and volumes.
		Cycle routes must be updated in advance or at least in tandem with development phases as current infrastructure cannot cope.	Comment noted. The City and County Councils will seek to ensure that cycle infrastructure is delivered alongside development.
		Another route into Marsh Barton needs to be considered.	Comment noted. Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access into/from Water Lane described by the SPD accord with this Vision and are supported by Devon County Council.
		A04 Train connections from Marsh Barton and St Thomas stations but no mention of links to the City Centre, St David's Station, RD&E Hospital and other major employment sites e.g., Exeter Science Park, Sowton Industrial Estate etc.	Comment noted. Code A04 provides proposals for a new bus service through Water Lane towards the city centre. Code A30 identifies a number of key off-site active travel connections which Water Lane development would be expected to contribute towards, including to the city centre, St David's Station and the RDUH.
		A06 A new car club provider needs to be found and guaranteed.	Comment noted. The Council will continue work to secure new and improved active services for the city.

Name	Organisation	Comment	Response
		A08 DCC parking controls need to continue to be carried out in both existing and new Residents' Parking areas.	Comment noted. The City Council will work with Devon County Council to ensure that parking controls operate effectively at Water Lane.
		How will this cope with electric cars?	Comment noted. Code Q04 requires development proposals to incorporate SMART grid and building infrastructure including electric vehicle charging systems.
		Existing residents should be given a guarantee that they can continue to park in the current parking zones.	Comment noted. Code A11 has been amended to clarify that parking and access rights will be safeguarded for existing residents.
		A09 Cycle storage provision needs to be adequate for e-bikes, cargo bikes, child carriers and include electric charging points.	Comment noted. Code A12 has been amended accordingly.
		A10 Access and egress need to be approved prior to planning consent.	Comment noted. Code A10 is clear that the strategic flood access and egress route must be planned early in the design process for Water Lane to ensure that it is well incorporated and meets the requirements of the relevant authorities. This will include the Environment Agency.
-	Local residents from the Haven Banks area	A03-Compulsory purchase of large areas of land (e.g., Water Lane) means that roads can be moved).	Comment noted. Compulsory purchase and the moving of roads can have significant viability implications for development and must be considered. The Council considers that the road layout provided for in the SPD is appropriate.
		In plans cannot differentiate primary / secondary routes (same colour).	Comment noted. Code A02 has been amended to new codes A02 (Active travel plan) and A03 (Vehicle access plan) and reference to primary and secondary streets etc has been removed.
		Haven Road must not be on a primary route - multiple leisure/hospitality venues result in pedestrian crossings.	Comment noted. Code A03 has been amended to clarify that Haven Road is not suitable for general vehicle access for new development and that it is identified in the LCWIP for reduced traffic speeds and volumes.

Name	Organisation	Comment	Response
		Cycle routes must be updated in advance or at least in tandem with development phases as current infrastructure cannot cope.	Comment noted. The City and County Councils will seek to ensure that cycle infrastructure is delivered alongside development.
		Open another route to Marsh Barton.	Comment noted. Lane is to be redeveloped as a low-car neighbourhood, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access into/from Water Lane described by the SPD accord with this Vision and are supported by Devon County Council.
		A04-Stresses connection to Marsh Barton and St Thomas stations but no mention of links to the City Centre, St David's station, RD&E Hospital and other major employment sites.	Comment noted. Code A04 provides proposals for a new bus service through Water Lane towards the city centre. Code A30 identifies a number of key off-site active travel connections which Water Lane development would be expected to contribute towards, including to the city centre, St David's Station and the RDUH.
		A06-Car club needs to be guaranteed.	Comment noted. The Council will continue work to secure new and improved active services for the city.
		A08-Protect existing resident parking controls in existing and new areas.	Comment noted. The City Council will work with Devon County Council to ensure that parking controls operate effectively at Water Lane.
		How will this cope with electric cars?	Comment noted. Code Q04 requires development proposals to incorporate SMART grid and building infrastructure including electric vehicle charging systems.
		A09-Cycle storage provision needs to be adequate for e-bikes, cargo bikes, child carriers and include electric charging points	Comment noted. The SPD has been amended accordingly.
		A10-Good approach. Thumbs up!	Support noted.
		Access and egress needs to be approved prior to approval of development.	Comment noted. Code A10 is clear that the strategic flood access and egress route must be planned early in the design process for Water Lane to ensure that it is well incorporated

Name	Organisation	Comment	Response
			and meets the requirements of the relevant authorities. This will include the Environment Agency.
-	Sport England	d. A09 – We support this principle around cycle parking and would encourage this in any commercial, or existing employment buildings as well to encourage more cycling in the area.	Support noted.
-	-	I agree with the codes apart from those relating to vehicle parking. If the ratio of 1:5, dwellings to parking spaces, refers to private vehicles, this is too high as it will still allow 320 vehicles (according to the Exeter Plan number of dwellings for Water Lane). Emphasis should be on car share spaces. Providing space to store polluting metal boxes that are only used, on average, less than 95% of their life is a highly inefficient use of space. Suggesting that a multi-storey car park should be built taller to accommodate bikes and kayaks transported on roofs is barbaric. How much extra cost and space will this use? What's wrong with removing them before entering the car park? Vehicles should not be permitted to enter the new developments. We should aspire to be like the City of Pontevedra in Spain. A population of 85,000 which has attracted 15,000 new residents since going car free 20 years ago. If you want to own a car, you should look to live elsewhere.	Comment noted. The City and County Councils consider that the indicative ratio is appropriate for a low car development at Water Lane. Code A11 is clear that proposals must include a site wide parking strategy that allows for levels of parking to reduce over time. Car sharing is promoted through the low parking ratio and the requirements for provision of car clubs, for example in codes A09 and A11. Code A09 has been amended and no longer include provision for car parking.
-	-	A06 In the primary mobility hub, the most convenient spaces should be allocated to car club vehicles rather than private cars (other than blue badge holders).	Comment noted. Car clubs are supported in codes A09 and A11.
		A09 "Parking should accommodate electric cycles, cargo bikes, and mobility scooters." There should also be somewhere for people to safely store cycle trailers, and	Comment noted. Code A12 requires cycle parking to be provided in line with government best practice.

Name	Organisation	Comment	Response
		cycle parking should be suitable for tricycles and non-standard bikes such as recumbents.	
-	-	A03 – good ideas	Support noted.
		A04 – it was a complete lost opportunity to not upgrade this crossing when the new station was being built. Is it expected that the developers provide the bus service or just liaise with Stagecoach?	Comment noted. Development proposals will be expected to make provision for a new bus service, liaising with the provider.
		A05 – an ideal location for Ride On Cycles to relocate.	Comment noted.
		A06/A07 - what about public toilet facilities, sadly lacking everywhere now. Parcel collection is a good idea.	Support noted. Proposals for new public toilets may come forwards under code W05.
		A08 - how many vehicles would the multi storey car park hold? That would be a much-needed facility if all the current parking is removed.	Code A09 has been amended and no longer include provision for car parking. Public car parking will continue to be provided at Haven Banks Car Park 1.
		A09 – good.	Support noted.
		A10 – is this plan just for pedestrians? Consideration should also be given that any new development does not increase the flood risk of existing buildings.	Comment noted. The strategic flood access and egress route is needed principally to provide residents at Water Lane with a means to safely leave the site in times of extreme flooding. One option, shown on the indicative illustration on page 99, is to use an existing raised railway for this route – the ‘high line’. This could also be used by pedestrians and cyclists more generally as an active travel route. Code Q15 is clear that development must not increase flood risk elsewhere.
-	-	Car ratio of one to five?? Look at what happens now. There isn't a ratio like that anywhere in the UK! Maybe it is in Holland but definitely not Exeter. Junctions around this area are already at a standstill without hundreds of new residents. Deal with the roads	Comment noted. Water Lane is planned as a low car neighbourhood supported by high quality active travel and public transport infrastructure. The City and County Councils are satisfied that the average parking ratio is appropriate.

Name	Organisation	Comment	Response
		first and not once the city is ruined by not so bright ideas about how a new resident won't use a car.	

Q28. Do you have any comments on the Active Streets codes A11-A22?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	A04 – Public transport (p. 89) We suggest the addition of: 'Options for public transport are also possible on the waterway. A combined bus and ferry ticket from the City Centre to the Quay and hop on-hop off points at Marsh Barton Station and other waterside destinations will add to active leisure and travel opportunities. Water taxis could operate seasonally.' See also W12 – Clapperbrook Hub (p. 9 of this document, above).	Comment noted. This level of detail is not considered appropriate to an SPD.
		Water Lane Section 4: Gabriel's Wharf apartments, access and movement (p. 100) The requirement to provide access for cranes and other vehicles to the waterside at Gabriel's Wharf has been omitted from the 'acceptable' design code, making it unacceptable. See also the commentary on W11 and its illustration on p. 61 (pp. 8-9 of this document, above). Even if the Green Street link between Foundry Lane and Water Lane were used, how would the waterside at Gabriel's Wharf be reachable?	Comment noted. Code W11 has been amended to state that Gabriel's Wharf is required to safeguard a craning point and vehicle access for articulated lorries and a crane.
		A22 – Green Lanes (p. 110): We support a call for a general speed limit in the area for cycles and e-traffic in pedestrianised zones and on tow paths where there is shared use. This may not be legally enforceable but	Comment noted. Setting speed limits is not within the remit of the planning system. However, Water Lane will be designed as a low car neighbourhood where active travel is prioritised and reducing traffic volumes and speeds is implicit within this.

Name	Organisation	Comment	Response
		<p>nonetheless will add force to warnings to be aware of slower and vulnerable pedestrians and movers.</p>	
-	<p>Cillarda Group Exeter Ltd</p>	<p>Access Strategy</p> <p>Outline Planning Application – Water Lane South</p> <p>2.10 The current outline planning application for Water Lane South proposes a new primary access running off a junction on Tan Lane and alongside the railway line and this approach is supported by the highway authority, Devon County Council.</p> <p>2.11 This new access, given the preliminary name of Foundry Lane, has been designed to serve Water Lane South, Water Lane North and existing residential properties between Cotfield Street and Gabriel’s Wharf, supporting a low car, active travel and public transport focused new neighbourhood (further detail is provided by the Technical Note prepared by Stantec and attached at Appendix 1) The new road, incorporating segregated pedestrian and cycle provision enables creation of access to Water Lane North in a phased manner, with phase 1 providing access via Foundry Lane and Water Lane in the short term (see Appendix 1, Figure 3) and phase 2 providing a more direct route across Water Lane when the Vulcan Estate land immediately north-west of the Electricity Distribution Site comes forward for development (see Appendix 1, Figure 4). It also facilitates provision of a strategic access and egress route to serve the wider area in the event of an extreme</p>	<p>Comment noted. New code A03 has been added to the SPD setting out a range of highways access options for Water Lane, recognising that each of these options may be appropriate at different stages of development. The options shown include the layout proposed in the Water Lane South outline planning application.</p>

Name	Organisation	Comment	Response
		<p>flood event and the most efficient and effective provision of vital infrastructure for gas, power distribution and heat network connections.</p> <p>Draft SPD</p> <p>2.12 In addition to the mobility hub, the Council owned land at Michael Browning Way on the Water Lane frontage is shown in the draft SPD to accommodate an access road to future development of Water Lane North (A11- Mobility coding plan, A14 Water Lane access and movement, A19 – Michael Browning Way and A20 – Northern site access). As above, it is considered that the priority for future use of this land should be the provision of a new primary school. This aside, the provision of a new junction and access road here results in unnecessary additional road infrastructure, contrary to the aim of creating a pedestrian and cycle priority new neighbourhood.</p> <p>2.13 The proposed access arrangement would result in intensification in the use of the Water Lane/Willeys Lane and Tan Lane crossroads, which is likely to lead to highway safety concerns. In addition, a fundamental issue is the requirement for third-party land acquisitions necessary to deliver the proposed access, including land within the outline planning application for Water Lane South, which would have major adverse impacts on the deliverability of this live planning application proposal (see Appendices 1 and 2 for further detail).</p>	

Name	Organisation	Comment	Response
		<p data-bbox="562 244 707 268">Conclusions</p> <p data-bbox="562 320 1267 619">2.14 The access strategy incorporated within the current outline planning application for Water Lane South supports the creation of an active travel and public transport focused new neighbourhood. It provides access for Water Lane North in a phased manner which is deliverable in the short term without multiple third-party land acquisitions and with an enhanced long-term connection when adjoining land comes forward for development.</p> <p data-bbox="562 671 1256 970">2.15 The separate access to Water Lane North proposed in the draft SPD introduces unnecessary additional highway infrastructure, would be likely to generate highway safety concerns and is undeliverable without significant third-party land-take putting at risk delivery of the live outline planning application proposal for Water Lane South and significantly increasing the delivery cost for the infrastructure.</p> <p data-bbox="562 1023 1245 1121">2.16 We therefore object to the access strategy shown in the draft SPD and request that the second access via land at Michael Browning Way is removed from the SPD.</p>	
		<p data-bbox="562 1141 869 1165">Water Lane Canal Section</p> <p data-bbox="562 1217 1238 1316">5.3 The section drawing shown on p101 appears to show the existing street wider than it is on the ground. We request that this is reviewed and corrected as necessary.</p>	<p data-bbox="1299 1141 2007 1201">Comment noted. The drawing (now on page 109) has been reviewed and amended accordingly.</p>

Name	Organisation	Comment	Response
-	-	A12, P96 HGV and cranes to access Gabriel's Wharf	Comment noted. Code W11 has been amended to state that Gabriel's Wharf is required to safeguard a craning point and vehicle access for articulated lorries and a crane.
-	-	A14, P98 baffling diagram and descriptions. Very muddled	Comment noted. Code A14, as amended, shows the access and movement requirements for different areas of Water Lane (the street).
-	-	A22, P110 green lanes must not be the sole access route for cycles. If they are then some cycles will go very fast e.g., for commuting and the green lanes will become dangerous rat runs.	Green Lanes will not be sole access route for cycles. New code A02 provides an active travel plan for Water Lane and shows a range of cycle routes through the site. Setting speed limits is not within the remit of the planning system. However, Water Lane will be designed as a low car neighbourhood where active travel is prioritised and reducing traffic volumes and speeds is implicit within this.
-	-	A23, P112 bridges wide enough for two cargo bikes to pass. Clearance for SUPs to pass underneath, and openable for larger vessels.	Comment noted. Code A27 is clear that the design and location of the new canal crossing will need to increase pedestrian and cycle permeability and be informed by work feasibility, prepared in consultation with Canal stakeholders. It also states that the proposal must ensure the continued navigation function of the Canal.
-	-	A11-Footpaths and cycle paths are difficult to make out. Would be useful if the proposed foot/cycle bridge around River Meadows linked to an upgraded foot/cycle path between here and the quay on the north side of the canal.	Comment noted. A new code (A02) has been added to clarify the location of pedestrian and cycle routes. The location of the new canal crossing will be determined by a feasibility study. Code A02 indicates a connection between the bridge and National Cycle Route 34 along the northern side of the Canal.
-	-	A12-Water Lane should be car free, with limited hours access for loading/servicing only. Ensure a commercial bus service can be provided here. Most of the site is within 400m of the existing Haven Close bus route anyway, or	The Council does not consider it appropriate that Water Lane should be entirely car free. For example, car access to the area will still be required to support tourism, leisure activities and the planned new primary school and to serve existing

Name	Organisation	Comment	Response
		<p>within a walk of bus routes in Marsh Barton, so why divert a bus into the development, requiring wider, less attractive carriageway to accommodate buses.</p>	<p>residents and businesses. The Mobility Strategy in the SPD does, however, seeks to minimise the need to travel by car to Water Lane, which will enable car parking provision to be similarly minimised. It is considered appropriate to seek to deliver a new bus service through Water Lane, in order to support the success of the new neighbourhood. The City Council will work with Stagecoach to enable provision.</p>
		<p>P99 Dedicated space for cycling should be strongly considered if cars are allowed to access this Water Lane, which is identified as the main cycling route. While traffic flows will be less than 2000vpd enabling on-street cycling, this will likely be very heavily used by people cycling, particularly when Marsh Barton is built out. To be highly attractive to all users including children, dedicated cycle provision should be provided.</p>	<p>Comment noted. Code A02 is clear that the design of cycle routes will depend upon traffic volumes and carriageway width and will need to accord with LTN 1/20 guidance.</p>
-	Exeter Civic Society	<p>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.</p>	<p>Comment noted. The mobility coding plan is considered to be appropriately placed in the SPD. Details of the functions and designs of the streets are set out in detail in subsequent codes. Code A19 is clear that the Neighbourhood Street should be clear from general through traffic and set a new high-quality benchmark for active travel. New code A02 provides an active travel plan for Water Lane.</p>
		<p>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.</p>	<p>Comment noted. Code W11 has been amended to state that Gabriel's Wharf is required to safeguard a craning point and vehicle access will be needed for articulated lorries and a</p>

Name	Organisation	Comment	Response
		<p>It would be helpful if any EA flood defence/risk document is provided as a link to the final paragraph.</p>	<p>crane. The Strategic Flood Access and Egress Study is currently being prepared and is referred to on page 99.</p>
		<p>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).</p>	<p>Comment noted. Code A17 has been amended to show the different zones in number order from north to south and the primary mobility hub. The cross sections on pages 107 to 109 have been amended to more clearly relate to the plan on page 104. The supporting text to the cross sections has been amended to explain that the overall width of Water Lane is to be determined and that segregation is preferred where space exists. The design of cycle routes will depend upon traffic volumes and carriageway width and will need to accord with LTN Note 1/20 guidance.</p>
		<p>A15 -Neighbourhood Street: The street name needs to be reconsidered.</p>	<p>Comment noted. The street name is appropriate for the purposes of an SPD.</p>
		<p>A16 Haven Road/Maritime Court:</p>	<p>Comment noted. New code A03 is clear that Haven Road is not suitable for general vehicle access for new development</p>

Name	Organisation	Comment	Response
		<p>The speed limit here should be 5mph, as vehicular traffic will be kept to a minimum.</p> <p>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.</p> <p>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</p>	<p>and that it is identified in the LCWIP for reduced vehicle speeds and volumes. Setting speed limits is not within the remit of the planning system. However, Water Lane will be designed as a low car neighbourhood where active travel is prioritised and reducing traffic volumes and speeds is implicit within this.</p> <p>Comment noted. Code A02 has been amended and no longer refers to primary, secondary and tertiary streets. New code A02 is clear that Foundry Lane should be designed to prioritise active travel. The design of cycle routes will depend upon traffic volumes and carriageway width and will need to accord with LTN Note 1/20 guidance. The SPD does not identify a cycling commuter route and it is not proposed to create a segregated cycle lane adjacent to the railway line. New code A02 shows an LCWIP route/feeder route running along Water Lane and code A15 explains that this will be the main active travel route through the site.</p>

Name	Organisation	Comment	Response
		<p>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.</p> <p>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).</p>	
		<p>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.</p>	<p>Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access described by the SPD accord with this Vision. Use of the Tan Lane underpass will be restricted to public transport, cyclists and pedestrians.</p>
		<p>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.</p>	<p>Comment noted. Green Lanes will not be sole access route for cycles. New code A02 provides an active travel plan for Water Lane and shows a range of cycle routes through the site. Setting speed limits is not within the remit of the planning system. However, Water Lane will be designed as a</p>

Name	Organisation	Comment	Response
			low car neighbourhood where active travel is prioritised and reducing traffic volumes and speeds is implicit within this.
-	Sport England	e. A11 – Sport England would like to ensure that the off-site path (A26) is supported with sightlines from buildings and also effective lighting to ensure safety.	Comment noted. A new code (L28) has been added to the SPD on designing out crime, which will address matters such as natural surveillance and effective lighting to ensure safety.
		f. A11 – there is a pinch point at the Northern Site Access where the water lane road carries traffic through the new development. Consider where there may be insufficient space to accommodate all modes of transportation, so that design measures can be put in place to ensure that active modes of transportation will take priority over vehicles (see section 3.1 of AD3).	Comment noted. Further technical work on the northern access has been undertaken, seeking to maximise available carriageway width to accommodate all modes of transportation. Code A17 has been amended accordingly.
		g. Sport England are very supportive of the active travel networks that have been incorporated into the SPD. This includes the green streets and green lanes where people of all ages and abilities can play and support their health and wellbeing.	Support noted.
-	-	I agree with the codes apart from allowing access to general traffic. The new developments should prohibit private vehicles from entering and prioritise use of car sharing.	Comment noted. The Council does not consider it appropriate that Water Lane should be entirely car free. Car access to the area will still be required to support tourism, leisure activities and the planned new primary school and to

Name	Organisation	Comment	Response
			serve existing residents and businesses. Delivering a large low-car neighbourhood at Water Lane will be a significant achievement.
-	-	A12 occasional heavy goods vehicles should include vehicles which can transport large vessels to the craning point at Gabriel's Wharf. There does not seem to be such access planned to get to the craning point by the canal basin.	Comment noted. Code W11 has been amended to state that Gabriel's Wharf is required to safeguard a craning point and vehicle access for articulated lorries and a crane. Code A15 has been amended to state that a crane must be able to access Gabriel's Wharf.
		A21 and A22 Green streets and lanes sound great.	Support noted.
-	-	A14 I would like to see a segregated cycle route in all sections of Water Lane. Stop-start vehicles such as delivery vans and buses can make cycling feel much less safe and convenient. It's also important to avoid conflict between people cycling and walking. Water Lane is long enough that cyclists will want to travel at reasonable speed and this will be unpleasant for pedestrians.	Comment noted. The supporting text on pages 107 and 108 has been amended to clarify that, where space exists, segregation of cyclists is preferred. The design of cycle routes will depend upon traffic volumes and carriageway width and will need to accord with LTN Note 1/20 guidance.
-	-	A12 – good	Support noted.
		A13 – ramps are good idea but need to be not too steep and the general walking surface should not get overly slippery when wet or be cobbled and uncomfortable to walk/ride on (eg Quay Hill).	Comment noted. Code A16 has been worded to ensure that access points are generous, well-designed, accessible and inclusive.
		A14 – it is very difficult to see without the existing street names being shown where these zones go – e.g., Zone 4, segregated cycleways would make existing busy roads even narrower.	Comment noted. Code A17 has been amended to provide further clarification. The supporting text on pages 107 to has been amended to clarify that, where space exists, segregation of cyclists is preferred. The design of cycle routes will depend upon traffic volumes and carriageway width and will need to accord with LTN Note 1/20 guidance.
		A16 – it is vital that people who live in this area maintain vehicular access to their properties, no mention is made of	Comment noted. Code A11 has been amended to clarify that parking and access rights will be safeguarded for existing residents. Setting speed limits is beyond the remit of the

Name	Organisation	Comment	Response
		speed limits which should be reduced to 20 to safeguard pedestrians.	planning system, but the design requirements of the code are intended to minimise traffic volumes and speeds.
		A18 – Tan Lane should be opened up to local residents' vehicles to access Marsh Barton which would relieve traffic on Alphington Road and Haven Road.	Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access described by the SPD accord with this Vision. Use of the Tan Lane underpass will be restricted to public transport, cyclists and pedestrians.
		A19 – good idea to extend Michael Browning Way	Support noted.
-	-	Again, no thought given to the current situation of this area. Add people and you add cars. With more vehicles using the already under strain routes in and out of the city.	Comment noted. Water Lane will be designed as a low-car neighbourhood supported by high quality active travel and public transport infrastructure.
		No mention of upgrades to Alphington Street railway bridge (next to Willeys Avenue)	Comment noted. Code A30 requires development to support improvements to off-site travel links, including the Alphington Street railway bridge.
-	-	The entire section is full of gobbledegook. I am well educated, and even I am having a problem trying to work out how this would read, were it written in plain English.	Comment noted. The SPD has been amended through the expansion of the glossary.

Q30. Do you have any comments on the Active Streets codes A23-A26?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	A23 – Canal crossings (p. 112): A new bridge across the Canal in the Water Lane area would slow down operation of the waterway and impede navigation and entrance and exit from the Canal Basin. All new bridges must have a headroom above water of at least 3.2m (10–11 feet) or at least be equal to the future headroom beneath the A379	Comment noted. Code A27 states that feasibility work will be undertaken to determine the location design of the bridge, informed by engagement with Canal stakeholders. The code is clear that proposals must ensure the continued navigation function of the Canal.

Name	Organisation	Comment	Response
		<p>moveable bridges when they are replaced. Alternatively, they must be at the same height as the M5 motorway bridge! New bridges must be swing bridges, both electrically and manually operable, and boater operated. They must not restrict the width of the canal.</p>	
		<p>A24 – Canal tow path (p. 112): Our objection to widening the Canal tow paths to accommodate bicycle and e-cycle/scooter traffic has been made under Active Streets (p. 10 of this document, above).</p>	<p>Comment noted. Code A28 requires options to be explored to widen the Canal towpath to accommodate cycle use and an increase in pedestrian use. Water Lane (the street) will be the main active travel route through the site.</p>
		<p>A25 – Railway crossings (p. 113), final paragraph headed ‘Clapperbrook Bridge’: We cannot see how a bus route can be accommodated across the bridge and alongside the canal through the development.</p>	<p>Comment noted. Clapperbrook Bridge will need to be upgraded to accommodate future public transport. This is set out in code A04, which has been amended to clarify that land will also need to be safeguarded adjacent to the Canal.</p>
		<p>A26 Off-site connectivity and improvements (p. 114): The indicative location for a new river crossing needs investigation. It would put Butts Ferry out of business. That would be detrimental even though the ferry is old-fashioned. It would also disgorge onto the Quay at a very busy location.</p>	<p>Comment noted. Code A30 has been amended to remove reference to a new river crossing.</p>
-	Cilddara Group Exeter Ltd	<p>5.4 The draft SPD requires improvement of the Gabriel’s Wharf pedestrian underpass (A25, p113). This is supported in principle. However, the suggestion of a bridge across the railway is not feasible due to the infrastructure and gradients that would be required to provide disabled access and we request therefore that this is removed from the SPD. The underpass is outside the SPD area and improvement is reliant on funding and the agreement of Network Rail. We request therefore that the SPD refers to</p>	<p>Support noted and comment noted. Code A29 has been amended to remove reference to a bridge. The underpass is partially within the red line of the site and is a key off-sit connection, as recognised in code A30. It is therefore appropriate that development proposals should support improved active travel links in this location.</p>

Name	Organisation	Comment	Response
		this as an 'off-site' improvement which development can help to enable.	
-	-	A26, P114 bullet 10, shows a new river crossing. ECC staff thought this is an error. If a new river crossing is proposed, then this is not a good location.	Comment noted. Code A30 has been amended to remove reference to a new river crossing.
-	Exeter Civic Society	<p>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.</p> <p>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.</p> <p>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</p>	<p>Comment noted. Code A27 states that feasibility work will be undertaken to determine the location design of the bridge, informed by engagement with Canal stakeholders. Consideration of Canal users will be considered as part of this work. Code A27 has been amended to state that the work will include an assessment of the implications for the movement of larger vessels.</p> <p>Comment noted. Code A28 requires options to be explored to widen the Canal towpath to accommodate cycle use and an increase in pedestrian use. Water Lane (the street) will be the main active travel route through the site.</p> <p>Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access described by the SPD accord with this Vision. Use of the Tan Lane underpass will be restricted to public transport, cyclists and pedestrians. The high line is one potential option to provide a safe flood access and egress route, but the final solution will be informed by a Strategic Flood Access and Egress Study. Code A04 has been amended to clarify that</p>

Name	Organisation	Comment	Response
		<p>via Marsh Barton to Marsh Barton Station will provide this access.</p>	<p>land will also need to be safeguarded adjacent to the Canal. Code S13 is clear that development proposals must protect and maximise enhancement of the Canal as a County Wildlife Site.</p>
		<p>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.</p>	<p>Comment noted. The Council considers that coding for off-site connectivity improvements is appropriate. The City and County Councils will require applicants to support off-site connectivity improvements, with funding likely to be sought through Section 106 Agreements. Code A30 has been amended to clarify the key off-site links, including the removal of the new river crossing. The emerging IDP to support the Exeter Plan will identify the off-site links.</p>
		<p>Some notes on traffic flows outside the site:</p> <ul style="list-style-type: none"> • 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. 	<p>Comment noted. Devon County Council has now received funding to enable replacement of Mallinsons Bridge. Code A30 identifies connections to Cricklepit Bridge, including from the Quay, as a key off-site active travel link that development proposals should help to improve. E-bikes are supported in code A09, which requires provision for secure e-bike parking in the primary mobility hub; code A10, which requires provision of electric vehicle charging in the secondary mobility hubs; and code A12 which requires secure enclosed electric cycle parking to be provided for residents. Code 30 identifies Trews Weir Bridge as a key off-site active travel connection of which development proposals should support</p>

Name	Organisation	Comment	Response
		<p>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.</p> <ul style="list-style-type: none"> • 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. 	<p>improvements. In accordance with the National Planning Policy Framework and the Council's existing Sustainable Transport SPD, all development proposals at Water Lane that generate significant amounts of movement will be required to provide a travel plan, and planning applications will be required to be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be addressed.</p>
-	NHS Local Planning Authority Engagement	<p>A26 - Off-site connectivity and improvements In addition to the list there needs to be consideration for accessible and improved links to GP surgeries.</p>	<p>Comment noted. Given the location of GP surgeries likely to be used by residents, this is already covered in the list of areas listed in code A30 (i.e., City Centre, St Thomas, St Leonards).</p>
-	Devon Wildlife Trust	<p>A24 - Canal tow path This policy states that 'Options should be explored to widen the Canal tow path'. In order to ensure the tow path is widened, weak terminology such as 'should be explored' should not be included within policies. This should be replaced with 'The Canal tow path must be widened to...'</p>	<p>Comment noted. The phrase "should be explored" is considered to be appropriate.</p>
-	-	<p>Anything that prioritises and encourages active travel is a good thing!</p>	<p>Support noted.</p>
-	-	<p>A26 The current active travel connections over the river and beyond don't have capacity to take greatly increased traffic and I think the statement "explore opportunities to</p>	<p>Comment noted. Code A30 has been amended to state that "Development proposals should support improvements".</p>

Name	Organisation	Comment	Response
		improve active travel links" needs to be strengthened. If the river is a barrier active travel will not be the natural and most convenient choice.	
-	-	1. A25 - Do not agree that buses should use the Clapper Bridge or the route along the canal to the new Water Lane development.	Comment noted. The Council considers it important the safeguard land to enable provision of a public transport route over Clapperbrook Bridge and along the Canal, should this become viable in the future. This service would improve public transport connectivity through Water Lane to key off-site locations.
		2. A24 - Agree that the canal tow path should be widened for all users, incorporating the existing trees and new trees planted for this area along the path. Benches should also be incorporated along this route.	Support noted.
		3. A25 - Gabriel's Wharf - Would prefer underpass, as a lot of cyclists use this route.	Comment noted. Code A29 has been amended to remove reference to a bridge.
-	-	A23 – this must be high enough to allow functional assorted use of the canal.	Comment noted. Code A27 is clear that the new Canal crossing must ensure the continued navigation function of the Canal.
		A24 – although this would be welcomed with the canal and existing residential buildings it doesn't appear feasible without wholesale change of the canal bank.	Comment noted. Any widening of the Canal towpath will need to be informed by further feasibility work, but would improve connectivity for active travel. Code S13 is clear that the Canal edge must be predominantly natural to give plenty of space for wildlife and retain its natural character.
		A25 - Tan Lane should be opened up to local residents' vehicles to access Marsh Barton which would relieve traffic on Alphington Road and Haven Road.	Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access described by the SPD accord with this Vision. Use of the Tan Lane underpass will be restricted to public transport, cyclists and pedestrians.

Name	Organisation	Comment	Response
		A26 – “traffic impact can be mitigated” yes, most important for existing residents. Mallison Bridge also needs replacing at the Quay, it should have been built with more than the 35 years life it had.	Comment noted. Devon County Council has now received funding to enable replacement of Mallinsons Bridge.
-	-	With the changes already made providing LTN areas the main routes are already struggling. The principles for these being set during Covid. Strangely there weren't many people or people around then as we had to stay home. Please try to make Exeter a city for all of its residents and not just a cycling minority.	Comment noted. Living at Water Lane may particularly appeal to people who wish or are happy to use active travel and public transport to access their daily needs, including for employment. However, the SPD will also ensure that people who need to use a car are able to do so.

Q32. Do you have any comments on the Spaces for People and Wildlife codes S01-S11?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	Connecting with the Canal, River and Valley Park (p. 115) and S13 – Canal (p. 125) Although the Canal is ‘one of Exeter’s most important natural corridors’ and we are glad that it is so rich, it is important to remember that the Canal is first and foremost a working industrial structure and a vital part of Exeter’s fabric and the economic future of the Port of Exeter. Its contribution to ‘green infrastructure’ comes as a welcome result. This is relevant in such matters as maintaining the edges of tow path banks and keeping the water clear for navigation. These points should be incorporated into S13, below.	Comment noted. Code S13 has been updated to recognise the Canal’s importance as a working industrial structure.
-	-	S06-Remove "wherever possible" from nature-based solutions requirement.	Comment noted. It is not always possible to use SuDs/nature-based solutions.

Name	Organisation	Comment	Response
-	Exeter Civic Society	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.	Comment noted. The Neighbourhood Centre will include a community green space, as shown on the Green Infrastructure Plan (code S01). Green infrastructure and open space is provided for via all of the codes in section 4.6.
		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.	Comment noted. The Council considers that the Green Infrastructure Plan is appropriately considered as a code in the SPD. Green infrastructure and open space is provided for via all of the codes in section 4.6.
		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.	Comment noted. Proposed materials and planting will need to be agreed by the Council.
		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.	Comment noted. Code S03 already includes reference to links to the Green Circle. Proposals to support initiatives will need to be agreed by the Council to ensure that they are robust and appropriate. Projects may be suitable for inclusion in the IDP.
		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.	Comment noted. Ecological baseline information and opportunities for improvement will need to be agreed by the Council to ensure that they are robust and appropriate.
		S07 Trees. The aspiration to increase tree cover by 5.5% is extremely low in an area devoid of trees other than	Comment noted. Code S07 aligns with policy NE7 of the emerging Exeter Plan and is considered appropriate.

Name	Organisation	Comment	Response
		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.	Comment noted. Code S09 is clear that development proposals should make suitable provision for play space in accordance with the Council's Play Strategy guidance.
		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.	Comment noted. There may be opportunities to provide smaller community growing areas within the site.
		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.	Comment noted. The design and size of balconies will be a matter for consideration at detailed planning application stage.
-	Haven Banks Residents' Group	ECC to ensure biodiversity 'net gain' on all planning application and ensure it is delivered.	Comment noted. In accordance with new national planning policy, the City Council is working to ensure that all planning applications meet biodiversity net gain requirements. Code S04 requires development proposals to be ambitious in delivering biodiversity net gain.
		S01 A green corridor to be created along the canal to protect biodiversity and net gain, providing a continuous protected green lung into the centre of the city.	Comment noted. Code S13 seeks to ensure that the Canal is protected and enhanced as a corridor for biodiversity. Code S04 requires development proposals to be ambitious in delivering biodiversity net gain.
		S07 For the health and wellbeing of each and every existing and potential resident of the area, all trees must be retained – with no trees to be cut down. We need to know the ratio of trees to people.	Comment noted. Code S07 is clear that existing trees should only be removed if clearly justified and compensated for by new planting. Development proposals will be encouraged to

Name	Organisation	Comment	Response
			increase the tree canopy cover by at least 5.5% compared with the pre-development baseline.
-	Local residents from the Haven Banks area	ECC to ensure biodiversity 'net-gain' on all planning application and ensure it is delivered.	Comment noted. In accordance with new national planning policy, the City Council is working to ensure that all planning applications meet biodiversity net gain requirements. Code S04 requires development proposals to be ambitious in delivering biodiversity net gain.
		S01-Green corridor along canal to protect biodiversity, net gain. Provide continuous protected green lung into centre of city.	Comment noted. Code S13 seeks to ensure that the Canal is protected and enhanced as a corridor for biodiversity. Code S04 requires development proposals to be ambitious in delivering biodiversity net gain.
		S07-Retain all trees. Specify tree/people ratio. No trees to be cut down.	Comment noted. Code S07 is clear that existing trees should only be removed if clearly justified and compensated for by new planting. Development proposals will be encouraged to increase the tree canopy cover by at least 5.5% compared with the pre-development baseline.
-	Green Party	S01&S02 The Green infrastructure plan should set out specific biodiversity diversity plans and targets. See comments elsewhere. Nature doesn't work in a straight line, and the green infrastructure plan is poor in this regard. There should also be off-site improvements of green infrastructure in the wider Haven Banks housing area. For example, the greening of streets beyond the SPD area (Isca Road used to be a road with cherry trees) there are no play spaces for the dense community living in these terrace houses and consideration should be given to what residents would like to see to improve the green infrastructure in this wider area.	Comment noted. Policy requirements to improve biodiversity at Water Lane are set in a range of codes in section 4.8 of the SPD. Under planning legislation, Section 106 Agreements must be necessary to make a development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. However, code S03 is clear that where necessary, contributions towards to enhance green infrastructure will be sought. Residents of neighbouring areas will be in close proximity of play areas provided at Water Lane. The Green Infrastructure Plan does not show all areas of open space that will provided at Water Lane, which will be determined through the detailed planning application process. Code S02

Name	Organisation	Comment	Response
		<p>The Green infrastructure plan and a site map would seem to be in conflict with SO2 because is there really sufficient space allocated to meet the benchmark guidelines? There should be.</p> <p>There should also be an expectation that the open space should be rich in biodiversity, rather than lots of grass.</p> <p>The open space must also have stewardship arrangements to be maintained in perpetuity. Welcome the policy that involves residents in the stewardship model.</p>	<p>has been amended to clarify that all new open space should use native, wildlife-friendly, hardy and robust planting. Code SO2 is clear that a strategy for stewardship and ongoing maintenance must be agreed with the Council at an early stage. This would need ensure for both in perpetuity.</p>
		<p>S03 There should be an additional point in this policy which prohibits pollutants from entering the canal and the river.</p> <p>The protection of the green circle is important and this should be improved.</p> <p>The railway bank is important wildlife at the moment, and this must be protected during construction and once development has been completed there should be no public access to the railway bank.</p>	<p>Comment noted. The Council will continue to work with South West Water to ensure that the sewage system is able to accommodate development at Water Lane. Additional text has been added to page 47 setting out the sewage infrastructure improvements needed. Protecting the Green Circle is recognised in code S03. Code S14 is clear that development proposals must protect and enhance the railway embankment as an important wildlife corridor.</p>
		<p>S04 Welcome the requirement to recognise the ecological baseline. There needs to be some external work to ensure that the baseline is soundly established against which the developers have to double check and then demonstrate how they will make by diversity net gains. The mitigation hierarchy isn't strong enough. Steps to 'avoid' affecting</p>	<p>Comment noted. Ecological baseline information and opportunities for improvement will need to be agreed by the Council to ensure that it they are robust and appropriate. The mitigation hierarchy accords with the NPPF. Code SO3 states that development proposals should explore opportunities to support initiatives in the Riverside Valley</p>

Name	Organisation	Comment	Response
		<p>protected species isn't strong enough, at the very least they have to comply with the law.</p> <p>There should be a development fund set up to mitigate adverse effects on the Valley Park (as well as the Exe estuary and the UK national site network these sites are too far away).</p>	<p>Park. It may be possible seek developer contributions towards maintaining and managing the Riverside Valley Park though policy L1 of the Exeter Local Plan First Review, which states that measures to enhance the Valley Parks will be implemented.</p>
		<p>S05 This should be strengthened to say that the developments are 'expected' rather than encouraged to achieve the urban greening factor.</p>	<p>Comment noted. An Urban Greening Factor policy is proposed for inclusion in the emerging Exeter Plan, but the Council does not currently have an adopted planning policy on this issue. Therefore, at present, it is only possible for the SPD to encourage developers to meet this policy.</p>
		<p>S06 This is welcome and there should be explicit provision for their ongoing maintenance and for replanting should they fail.</p>	<p>Support noted and comment noted. Code S06 has been amended to require agreement with the Council of a strategy for ongoing stewardship and management of SuDs.</p>
		<p>S07 The development must protect existing trees and accommodate them into the design. The important role of fruit and nut trees should be incorporated. This can build on the work of FLOW community orchard and advice should be taken on how food producing trees can be incorporated across the site.</p> <p>The poplars along the Canal and other trees identified with TPOs MUST be protected.</p>	<p>Comment noted. Code S07 is clear that existing trees should be removed if clearly justified and compensated for by new planting. Code S10 requires smaller community growing areas to be provided within developments site near where people live. Development proposals will be encouraged to increase the tree canopy cover by at least 5.5% compared with the pre-development baseline. Trees with TPOs will be protected in accordance with legislation.</p>
		<p>S08 Planting should also enable spaces for people to undertake food planting or the very least have trees which provide fruit or nuts. The planting must not be on contaminated land and the maintenance program must be</p>	<p>Comment noted. Code S10 requires smaller community growing areas to be provided within developments site near where people live, supported by a strategy for ongoing responsibility and maintenance.</p>

Name	Organisation	Comment	Response
		funded in perpetuity. Planting also needs to give regard to the provision of shade in open spaces.	
		<p>S09 Welcome! The point about the play areas should be easy to access and integrated into the overall design. However, this is conflicting with the idea that they should be centrally located. There should be play sites located across the whole development because it is a very large site and multiple opportunities should be offered to provide variety and a sense of security, particularly when children are going out to play by themselves.</p> <p>It is concerning that the NEAPs being supported by and through offsite contributions because there are NO nearby NEAPs. So, this won't be of value to the residents in the development and contradicts national guidance on access. Many children from here simply won't go up to KGV playing field as it is too far away.</p> <p>Consideration should be given to incorporating an adventure playground/nature based accessible NEAP playground in the Grace Fields playing field. This could be in community stewardship if it is funded as part of the development. Cross reference with policy S15 and the nature-based play area.</p>	Support noted and comment noted. The term 'centrally located seeks to ensure that play areas are not located at a distance from residential areas, on the periphery of Water Lane, but well within the site. Code S09 notes that Bromham's Farm and Clapperbrook Hub provide opportunities to new and enhanced NEAPs and playing fields.
		S10 This is welcome and must be provided on sites which are decontaminated.	Support noted and comment noted. Proposals will be required to comply with policy EN2 of the Exeter Local Plan First Review in respect of contaminated land.
		S11 Residential open space should be more explicit about green roofs and green walls.	Comment noted. Green roofs and walls do not form part of the residential open space requirement and so are not referred to in code S11. Both features may contribute to

Name	Organisation	Comment	Response
			biodiversity net gain under code S04, urban greening factor requirements under code S05 and planting requirements under code S08.
-	Devon Wildlife Trust	<p>S03 Green and blue infrastructure, S04 Biodiversity, S06 Sustainable Drainage Systems (SuDS), S08 Planting, S09 Play, S10 Food growing & S15 Grace Road Fields</p> <p>Throughout these policies, the word 'should' needs to be replaced with 'must' to ensure the requirements of the policies are delivered. Further weak phraseology including 'wherever possible' should be removed or replaced with 'unless it can be satisfactorily demonstrated that this is not feasible'.</p> <p>S04 Biodiversity</p> <p>We would urge the Council to commit to a policy which is genuinely 'ambitious in delivering biodiversity net gain'. This would require a change in terminology from 'exceed the minimum requirement wherever possible.' Biodiversity Net Gain allows the option for off-site enhancements and therefore exceeding the minimum requirement is always possible. We would suggest that weak phraseology is replaced with a strong commitment: 'must exceed 20% biodiversity net gain'.</p> <p>The policy states that 'Development proposals must strengthen existing important habitat corridors along the Canal and the railway embankment', however it is noted that habitat corridors in these areas have not been included within the W02 Land use plan or A11 Mobility coding plan. This should be amended. We would expect to</p>	<p>Comment noted. Where appropriate under existing adopted planning policy, codes within the SPD have been amended to provide greater clarity and/or specification.</p> <p>Comment noted. The terminology relating to biodiversity net gain and bat and bird boxes is considered to be appropriate. The railway embankment and Canal corridor are both shown in the appropriate plan, this being the the Green Infrastructure Plan (code S01). Their role as habitat corridors is coded for in S13 and S14. The Green Lanes and Green Streets will help to provide habitat connectivity between the two corridors.</p>

Name	Organisation	Comment	Response
		<p>see strong habitat corridors created around all boundary features to connect the existing railway corridor and canal/Valley Park.</p> <p>The policy states that ‘Bat and bird boxes should be incorporated within the development in line with best practice guidance.’ There is no best practice guidance relating to bat and bird boxes. Bat and bird boxes should be installed at a rate of one box per dwelling. The RSPB recommends that swift boxes are utilised due to their universal adoption by a diversity of species.</p>	
		<p>S07 Trees. The text ‘are encouraged to’ should be replaced with ‘must’. ‘Are predominantly native’ should be replaced with ‘a minimum of 80% of which must be native’.</p>	<p>Comment noted. The 5.5% requirement amplifies policy NE7 of the emerging Exeter Plan. As the Exeter Plan is not yet adopted, the Council is currently only able to encourage development at Water Lane to increase the tree canopy by at least 5.5%. The term ‘predominantly native’ is considered to be sufficiently robust.</p>
		<p>S11 Residential open space. This policy is not currently deliverable. W02 – Land use plan requires additional areas of green space in order to ensure that delivery of this policy is feasible.</p>	<p>Comment noted. The Council considers that code S11 is deliverable. Green Infrastructure is shown on the Green Infrastructure Plan rather than the Land Use Plan, and does not show all areas of open space that will provided at Water Lane, which will be determined through the detailed planning application process. Code S02 requires proposals for residential open space to provide a range of open space in accordance with Fields In Trust benchmark guidelines.</p>
-	-	<p>All buildings should incorporate green/living walls and roofs to help reduce runoff</p>	<p>Comment noted. Both features may contribute to biodiversity net gain under code S04, urban greening factor requirements under code S05 and planting requirements under code S08.</p>

Name	Organisation	Comment	Response
-	-	<p>S02 Open Space: It is disappointing that almost all the open space is concentrated at the south of the site adjacent to the Energy from Waste site.</p> <p>The Energy from Waste facility is very noisy - so it is a less than ideal place for such an open area. Maybe this space could be reserved for employment and college facilities. It would be preferable to have more open space throughout the development.</p>	<p>Comment noted. The Green Infrastructure Plan does not show all areas of open space that will be provided at Water Lane, which will be determined through the detailed planning application process. Code S02 requires proposals for residential open space to provide a range of open space in accordance with Fields In Trust benchmark guidelines. Grace Roads Fields is identified as an opportunity site for wildlife, nature and energy.</p>
		<p>S04: This section appears to focus on biodiversity within the site. However, it is important to protect neighbouring areas from negative impacts (e.g., the canal and riverside).</p> <p>An obvious impact of the proposals as presented is the shading of the canal throughout most of the day.</p>	<p>Comment noted. Code S04 is worded to ensure consideration of the need to protect and enhance the biodiversity of areas outside of Water Lane. Code S13 requires development to protect the Canal as a County Wildlife Site and this will require consideration of overshading. Codes L05, L07 and L14 require buildings to be setback from the Canal to avoid over shading.</p>
-	RSPB	<p>SO1 Green Infrastructure Plan - recommend the Council ensures there is no loss to the overall provision of GI within the proposed development and that, should any minor amendments be proposed, there should be no loss of overall connectivity.</p>	<p>Comment noted. Code S01 seeks to safeguard existing green infrastructure at Water Lane. All other codes within section 4.6 seek to maintain and, where possible, enhance the existing green infrastructure and provide for new.</p>
		<p>SO2 Open Space - Sufficient funding must be allocated/ensured so that after appropriate implementation, ongoing management will ensure best quality outcomes for nature and people, rather than, for example, complex wildlife-friendly open spaces being degraded to simple regularly mown amenity lawns over time.</p>	<p>Comment noted. Code S02 is clear open space must include native, wildlife-friendly, hardy and robust planting. It also requires a strategy for ongoing management of open spaces to be developed and agreed with the Council; and development proposals to provide for the on-going management and maintenance of open space to standards that have been agreed with the Council.</p>

Name	Organisation	Comment	Response
		<p>SO3 The sentence that developments "should explore opportunities to support initiatives within the Riverside Valley Park . . ." is too vague. This development will increase usage of the existing adjacent and nearby green and blue spaces, so it is reasonable that the Council require that appropriate contributions are made to at least maintain and ideally enhance the value of those areas for people and nature. This is linked to mitigation for recreational impacts on the Exe Estuary SPA, Dawlish Warren SAC and East Devon Heaths SPA/SAC as ensuring that people can access sufficient wildlife-rich green spaces locally for their usual recreational needs will reduce impacts on those internationally important sites for wildlife.</p>	<p>Comment noted. Development at Water Lane will be required to mitigate for recreational impacts on the Exe Estuary SPA etc as per current adopted planning policy. It may be possible seek developer contributions towards maintaining and managing the Riverside Valley Park though policy L1 of the Exeter Local Plan First Review, which states that measures to enhance the Valley Parks will be implemented.</p>
		<p>SO4 The sentence "Bat and bird boxes should be incorporated within the development in line with best practice guidance" should be revised to specify that buildings should incorporate integral nest boxes, i.e., 'swift bricks', built in at a height of at least 5 metres, in accordance with BS42021:2022. While those targeted at swifts should be located high up, e.g., under eaves, swift bricks will also be used by other cavity nesting species including blue and great *****, house sparrows and even starlings. House sparrows, starlings and swifts are of high conservation concern. The large and tall apartment buildings proposed by this development should include numerous swift bricks (at a ratio of 1 per individual dwelling and an overall ratio of 1 per individual apartment for the large apartment buildings). As the boxes are built</p>	<p>Comment noted. The terminology in code S04 relating to bat and bird boxes is considered to be appropriate. Detailed matters of provision will be determined at planning application stage.</p>

Name	Organisation	Comment	Response
		<p>into the external walls as they are constructed, aspect is less important, but they should all have several metres clear air space below and in front of them (thus reducing risk of any predation). RSPB recommends that the most recent iteration of guidance on the range of integral swift bricks is provided to potential developers/applicants, that adequate and appropriate integral provision is required by condition and that those conditions are not discharged until confirmation of provision of the necessary numbers in appropriate locations is confirmed, including via provision of photographs. Disappointingly, none of the illustrations for the proposed development show integral nest sites built into building walls - recommend this is revised for any updates. [NB Any proposals for siting of commercial honeybees should not be regarded as a biodiversity measure as these will compete with native species for food sources.]</p>	
		<p>SO5 Urban Greening Factor. Recommend that developers are required to provide this. If it is optional, it may not be done, thus undermining the objective of the Water Lane development to deliver appropriate green features.</p>	<p>Comment noted. The UGF requirement amplifies policy NE6 of the emerging Exeter Plan. As the Exeter Plan is not yet adopted, the Council is currently only able to encourage development at Water Lane to provide for this.</p>
		<p>SO6 Sustainable Drainage Systems. Recommend that this is strengthened so that SuDS is not merely an option for developers.</p>	<p>Comment noted. It is not always possible to use SuDs/nature-based solutions.</p>
		<p>SO7 Trees. Support focus on native species and plants that have benefits for wildlife (eg, produce nectar, pollen, berries). Any non-native species used should not be invasive ones. Existing trees should be prioritised for retention wherever possible.</p>	<p>Support noted. The Council will seek to ensure that non-invasive species are planted. Code S07 is clear that existing trees should only be removed if clearly justified and compensated for by new planting.</p>

Name	Organisation	Comment	Response
		<p>S08 Planting. Support. Recommend this specifies that invasive non-native species must not be used. Planting beds should be sufficient to accommodate the roots/stems of trees as they grow. There needs to be sufficient finance secured from individual developments prior to commencement of construction so that appropriate management to maximise the value of these areas for nature and people can continue.</p>	<p>Support noted and comment noted. The Council will seek to ensure that non-invasive species are planted. Code S08 is clear that planting beds must be designed and sized to ensure an adequate growing medium and a clear maintenance regime for planting to be put in place. Code Q17 sets out requirements for ongoing maintenance and management of public realm.</p>
		<p>S11 Support. Important that people have ready access to wildlife-rich open space. Additional point - the overall proposal includes a new bridge over the canal. Recommend that this includes secure nesting sites under the structure/at the bankside for species such as grey wagtail.</p>	<p>Support noted and comment noted. Development proposals for the new Canal bridge will be required to comply with national biodiversity net gain policy. Provision of secure nesting sites on the bridge could be required as part of this.</p>
-	-	<p>1. S09 - Grace Road Fields - Should be used for child facilities i.e., football fields, basketball courts, children's play area with facilities. Parents could use the proposed cafe across the swing bridge to get a cup of tea, whilst the children play.</p>	<p>Comment noted. Grace Roads Fields is considered to be suitably identified as an opportunity site for nature, wildlife and renewable energy. Code W12 identifies the nearby Clapperbrook Hub as a location for a potential new cultural attraction, which could include uses such as an outdoor activity centre or city-scale play space.</p>
		<p>2. S02 - Toilet facilities do not seem to be taken into account for the public, when using this area i.e. cafe across the Marsh Barton Station swing bridge, in the whole of the development on Water Lane i.e. cafes.</p>	<p>Comment noted. Comment noted. A new café is likely to include provision of toilets for customers. Proposals for new public toilets may come forwards under code W05.</p>
-	-	<p>S02, S03, S04 – YES!!! But how realistic is this for developers? Will it put them off before anything gets going?</p>	<p>Support noted and comment noted. The requirements of these codes are in line with national and local planning policy and should be expected by developers.</p>

Name	Organisation	Comment	Response
		S05 – ‘the life of the building’ – how long will this be? The city shouldn’t plan for obsolescence and slums of the future, many residential buildings in the area are over a hundred years old, will new ones last that long?	Comment noted. The purpose of the SPD to deliver high quality development at Water Lane. Buildings with a long life are considered implicit to this.
		S06 – good ideas which fit in with the rest of this proposal.	Support noted.
		S07 – specifying types of trees is a good idea, so many new plantings don’t survive as they are not right for the particular placement.	Comment noted. Specifying specific types of tree is not considered necessary. Code S07 sets parameters seeking to ensure that selected trees are suitable and likely to grow healthily.
		S08 – could edible planting be considered such as fruit/nut/berry trees and bushes? This would tie in with S10, help with the food crisis and encourage people into the outdoor environment. Currently there are blackberry brambles and apple trees in parts of the area.	Comment noted. Code S08 specifies that tree species selected should be predominantly native – this may include fruit and nut trees.
		S09 – mentions children of all ages but omits abilities, differently abled children should be catered for as well.	Comment noted. Code S09 has been amended accordingly.
		S10 - fully agree	Support noted.
		S11 – what is meant by ‘balconies’ should they just be decorative not useable, only big enough for flowerpots or enable outside seating for the number of people in the dwelling?	Comment noted. The design and size of balconies will be a matter for consideration at detailed planning application stage.
-	Exeter Community Centre Trust	Where is the budget for ongoing maintenance of the spaces for people and wildlife? Is this included in the requirements for developers as part of the planning process?	Comment noted. The Council will expect developers to provide the ongoing budget for maintenance, as part of the planning process.
-	-	SO4 No specific mention has been made regarding the urban Fox population that exists in the area. They transit Water Lane every night when out foraging. They are clearly a part of the modern environment, and we must respect	Comment noted. Foxes are not protected species. Therefore the Council is unable to require development proposals to protect foxes and their habitats. However, the SPD does require development proposals to preserve, restore and

Name	Organisation	Comment	Response
		that. Efforts should be made to locate the den sites and have regard to their positions when planning the development. If they need to be relocated, then provision should be made for the sighting of new den sights for their use.	create wildlife habitats, corridors and networks and any other features of ecological interest including those related to protected and priority species.

Q34. Do you have any comments on the Spaces for People and Wildlife codes S12-S15?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	<p>S13, para 2 (p.125): While accepting the focus of the code, it is important to avoid giving an unbalanced impression. As an industrial structure, the Canal has no 'natural character' (unlike the river). The ecology and habitats for wildlife are a wonderful bonus but the wording of S13 is too prescriptive. We suggest rewording, 'The Canal edge should be as natural as possible to give plenty of space for wildlife compatible with the waterway's function and management. Hard edges shall be kept to a minimum.' The words in para 2, lines 3-4, 'and used only where needed to access the water' should be omitted because cut back and hard edges are also needed at places for navigation and visibility.</p> <p>Lighting from residential development along the Canal or near it must be carefully controlled.</p> <p>S15 – Grace Road Playing Fields (p. 126): The penultimate paragraph beginning 'Uses that are being considered' should include 'campsite'.</p>	<p>Comment noted. Code S13 has been amended to note the Canal's importance as a working industrial structure. However, the main purpose of this code is to protect and enhance the Canal's wildlife value. The need to maintain the navigation function of the Canal will be considered as part of the detailed planning application process. Lighting from residential development is covered by the 4th bullet point of code S13.</p> <p>Comment noted. Grace Roads Fields is a greenfield site in flood zone 3 and, in planning policy terms, is therefore part of the River Exe's functional floodplain. A campsite is classified in the National Planning Framework (NPPF) as a use that is</p>

Name	Organisation	Comment	Response
			<p>'more vulnerable' to flood risk. The NPPF is clear that such uses are not suitable in flood zone 3 and should not be granted planning consent. Therefore, it would not be appropriate for the Liveable Water Lane SPD to identify Grace Road Fields as suitable for a campsite. Grace Road Field is also within the Waste Consultation Zone of the Exeter Energy from Waste (EfW) Facility, identified in the Devon Waste Plan. It is highly likely that a campsite within the Waste Consultation Zone would be impacted by the noise, odour and dust etc. generated by the operations of the EfW and therefore this would not be a suitable use for the site. It is unlikely these impacts could be mitigated to an acceptable level. It is likely that Devon County Council, as the Waste Disposal and Waste Planning Authority, would object to such development on grounds that it would constrain the operation of the EfW Facility.</p>
-	Cillarda Group Exeter Ltd	<p>6.1 The draft SPD at S14 (p126) requires development to protect and enhance the railway embankment and suggests planting to improve its appearance and the provision of community growing areas. Whilst protection and enhancement of the railway embankment for wildlife and visual amenity is supported, the embankment is outside the SPD area and is managed by Network Rail. We request therefore that it is made clear in the SPD that it is not requiring development proposals to make enhancements on the railway embankment itself.</p>	<p>Comment noted. It is not necessary to state that the railway embankment lies outside the red line of Water Lane. It is reasonable to expect development proposals to protect and enhance this key green infrastructure corridor.</p>
-	-	<p>S13, P125 No lighting of the canal towpath please. Lighting would cause a detrimental effect on the wildlife.</p>	<p>Comment noted. Code S13 is clear that lighting along the Canal must be carefully considered to avoid impact on bats and other wildlife.</p>

Name	Organisation	Comment	Response
-	Exeter Civic Society	S12 The community green space. OK. Maybe the pictures should include the spaces in the final bullet point?	Comment noted. The photos on page 133 are considered to be appropriate.
		S13 Canal. All Ok but should there be more said about the canal here as a recreational area or is that covered elsewhere?	Comment noted. The Canal's recreational function is addressed in code W05.
		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.	Comment noted. There may be areas of the railway embankment that will benefit from improved planting.
		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.	Comment noted. Code S15 is clear that proposals should be developed in collaboration with the Council and other stakeholders. Proposals can be reflected in the IDP as appropriate.
-	Green Party	S12 This should include sports and make reference to the Bromham's field sports area and playing pavilion contribution should be made to rehabilitate this building and the fields. That needs to be a proper inclusion of bins, particularly to deal with dog poo. No reference is made to litter bins in the SPD.	Code S12 relates to the community green space within the Neighbourhood Centre.
		S13 This policy needs to tie into the policy relating to the tow path. Are both needed? Because this seems to be a	Comment noted. Code S13 focuses on maintaining and maximising the Canal's function as a wildlife corridor,

Name	Organisation	Comment	Response
		<p>better expansion of that previous policy. The lighting should be low at ground level and also have regard to people with visual impairments so that they can feel safe. There should be some policy somewhere about designing out crime. Part of this could include lighting which comes on as people move through the site.</p>	<p>whereas code A27 is about the function of the towpath as an active travel route. Code S13 specifies that lighting must be carefully considered to avoid impacts on wildlife whilst providing routes that people (which would include people with visual impairments) feel safe to use. A new code has also been added to the SPD on designing out crime.</p>
		<p>S14. The railway embankment policy might actually need to ensure access by people is prohibited and say that wildlife can be protected.</p>	<p>Comment noted. Code S14 requires development proposals to protect the railway embankment as an important wildlife corridor. The code has been amended to ensure proposals support safe operation of the railway, involving early engagement with Network Rail.</p>
		<p>S15. Grace Road Fields should be protected as a green space. The Canal basin/ Marina, sports/ recreation hub is not appropriate for this area - that should be developed out on Bromham's field as discussed elsewhere. Grace Road Fields is mentioned across a number of policies with conflicting/inconsistent ideas.</p> <p>There is a possibility that an energy generation energy hub could be incorporated, however, this should be integrated into the landscaping not visible/minimal impact or should not restrict public access e.g., as a ground source heat generation area or innovative wind turbine, rather than ground cover solar PV. The Riverside and Ludwell Valley parks master plan does not have any suitable ideas in it for Grace Road Fields, given that its idea of a campsite has been dismissed.</p> <p>New Bromham's Field a new canal basin could be created using a bund for liveaboard canal boats where fire safety, water supply can be provided etc. Proper pump out</p>	<p>Comment noted. Code S01 is clear that Grace Road Fields is part of the Green Infrastructure for Water Lane. The uses described in code S15 are compatible with this. Reference to a Canal Basin/Marina is taken from the Riverside and Ludwell Valley Parks Masterplan, developed alongside the local community. Bromham's Field is proposed as a new recreational/water-related hub under code W12. The landscape impact and public access of development proposals will be considered at planning application stage under existing planning policies.</p>

Name	Organisation	Comment	Response
		<p>facilities should be provided to prevent the emission of waste into the canal.</p> <p>The neighbourhood also needs to be able to relate well to its neighbouring areas otherwise it will feel rather exclusive or excluded.</p>	
-	Sport England	<p>Spaces for People and Wildlife – (Linked to AD3 principles 5 - Network of multi-functional open spaces and 6 - High quality streets and spaces)</p> <p>a. S15 – Sport England welcomes the use of Grace Road Fields as a sports and recreation hub. As this site is located a distance from other amenities, consideration around changing facilities and other amenities should be considered within Grace Fields.</p> <p>Sport England would like to be mentioned as a stakeholder for the design of Grace Road fields as the use of the site was previously laid out as playing fields.</p> <p>b. Although Grace Roads is not mentioned in the recent Exeter PPS, there is indication that with the increase in additional demand, there will be a need for more playing pitches (page 15 of the PPS).</p> <p>c. Sport England would recommend wording for S15 to indicate the need to deliver playing fields to meet the additional demand from residents.</p>	<p>Support noted and comment noted. Code W12 for the nearby Clapperbrook Hub includes provision for improved changing facilities. Code S15 has been amended to refer to Sport England as a key stakeholder.</p> <p>Comment noted. The need for playing pitches arising from development at Water Lane is covered by code S09.</p> <p>Comment noted. The need for playing pitches arising from development at Water Lane is covered by code S09.</p>
-	Historic England	<p>S15 – Grace Road Fields</p> <p>A brief review of our records suggests that there may be heritage interest in this area ‘Possible Prehistoric or Roman round barrow sites, seen as cropmarks’. Please consult your</p>	<p>Comment noted. The Council’s Heritage Officer and Historic England will be consulted on planning applications and archaeology will be considered under existing adopted planning policies.</p>

Name	Organisation	Comment	Response
		in-house heritage advisers about how this may influence proposals.	
-	Devon Wildlife Trust	<p>S13 Canal</p> <p>The policy states that ‘The Canal edge must be predominantly natural to give plenty of space for wildlife and retain the natural character of the Canal. Hard edges should be kept to a minimum and used only where needed to access the water.’ We would urge the Council to set a maximum developable area for the Canal edge in order to ensure that the aims of this policy are met. We would suggest a maximum of 10% of the edge is developed.</p> <p>The policy states that ‘Removal of riverside vegetation and introduction of artificial light must be avoided wherever possible or minimised with impacts fully identified and mitigated’. It is possible to mitigate for the loss of vegetation along the Canal if buffer planting can be undertaken on the opposite side of the bank from where vegetation is removed. However, it is not possible to adequately mitigate for the introduction of artificial lighting. Bats require dark corridors and introduction of lighting along a section of the Canal would result in a reduction in use of the Canal as a whole by light sensitive bat species. This paragraph must be reworded and must include text which states that the Canal must not be subject to an increase in existing light levels. Proposals which decrease light levels along the Canal should be encouraged and light levels must not exceed 0.5lux.</p>	<p>Comment noted. The terminology used in code S13 in relation to the edge of the Canal is considered appropriate. consider it necessary to specify a percentage. Code S13 is clear that lighting along the Canal must avoid impact on bats.</p>

Name	Organisation	Comment	Response
		S15 Grace Road Fields - This area is highlighted on the W02 – Land use plan as a ‘wildlife, nature and renewable energy opportunity site’. The majority of the policy supports this aspiration. However, the policy also states that the site is considered for ‘canal basin/marina, sports and recreation hub, energy centre, allotments and solar farm’. It is difficult to understand how this area could deliver goals for wildlife and nature, whilst also being utilised for one of these purposes.	Comment noted. The potential uses listed in code S15 are compatible with Grace Road Field’s green infrastructure role (code S01) and role as a wildlife, nature and energy opportunity site (code W02).
-	-	S12 Community Green Space: As noted before I believe that the green space should be spread throughout the development - not just at its southern edge.	Comment noted. A range of types of open space will be needed and provided for, as per code S02. Under that code, development proposals will be required to provide a range of open space in accordance with Fields in Trust benchmark guidelines, and this must be (amongst other things) located to ensure easy access from all parts of the development and from the wider site.
-	RSPB	S13 Canal and S15 Canal appear to be duplicates. The sentence "Hard edges must be kept to a minimum and used only where needed to access the water" is vague as it is not clear where access is needed. Would this result in individual applicants including many hard access points to the canal? Recommend that the Council review the existing access points and ensure that any additional ones are only provided where no adverse impact will result on the canal biodiversity. Lighting controls are obviously fundamental to protecting and enhancing the value of the canal and adjacent vegetation for bats so welcome the requirements. Recommend reference to standards set out in Bats and	Comment noted. Code S13 relates to the Canal and code S15 relates to Grace Road Fields. The terminology used in code S13 in relation to the edge of the Canal and lighting in connection with bats is considered appropriate.

Name	Organisation	Comment	Response
		artificial lighting at night by Institute of Lighting Professionals, Guidance Note GN08/23.	
-	-	S12 – good ideas but what about public toilets and litter bins (gull proof).	Comment noted. The design of litter bins will be a matter for consideration at detailed design stage. Proposals for new public toilets may come forwards under code W05.
		S13 – low level lighting might help with this such as in Tidenham tunnel, Monmouthshire.	Comment noted.
		S14 – good in theory but how do we prevent it all becoming overgrown such as at Willey’s Avenue with all the buddleia etc which means the pedestrian path is unusable?	Comment noted. Code S14 has been amended to require proposals are aligned with Network Rail’s strategy to increase biodiversity.
		S15 – isn’t this a repeat of S13??	Comment noted. Code S13 relates to the Canal and code S15 relates to Grace Road Fields.
-	Exeter Community Centre Trust	S12 - parking for blue badge drivers so that we can actually access these areas when we can't walk or cycle.	Comment noted. The local green space will be located within or near the Neighbourhood Centre. Code A19 allows for the provision of blue badge parking on the neighbourhood street.

Q36. Do you have any comments on the Connected Culture codes C01-C05?

Name	Organisation	Comment	Response
-	Exeter Civic Society	The Vision is very evocative but is it realistic?	Comment noted. Codes in section 4.7 of the SPD will help to deliver the Vision.
		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.	Comment noted. Code C01 is worded to allow local arts groups (etc.) to bring their ideas to developer, including through the engagement process coded for under M02.

Name	Organisation	Comment	Response
		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?	Comment noted. Code C02 is worded to allow local arts groups (etc.) to identify opportunities through the engagement process coded for under M02.
		C03 Creative industries. This seems very unlikely to materialise in commercially driven development, unless arts funding and ideas are identified before development comes forward.	Comment noted. Code S03 seeks to enable provision of this type of accommodation, should funding become available.
		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.	Comment noted.
		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.	Comment noted. Code C05 is worded to enable a city cultural hub to be promoted flexibly.
-	Green Party	C02 The innovative street furniture, signage, way finding etc. should also be practical, consistent, and comfortable. There should also be consideration of the appropriate infrastructure to enable festivals, events, stalls lighting etc to be installed with ease in a range of weathers (such as building hooks and power points). All of the above should be based on principles of environmental sustainability. These spaces could be managed by a community owned business.	Comment noted. Code C02 has been amended to state that street furniture (etc.) must practical as well as innovative; and that spaces must include appropriate supporting infrastructure. Management of these spaces by a community owned business could be acceptable under code Q17, as amended.
		C05 City Cultural hub is a good idea but very weak. Elsewhere there is reference to a Heritage Centre and other sorts of community building. If there is not clarity at this stage, then it will be a 'omni purpose' building which	Comment noted. Code C05 is worded so that the role and function of any new city cultural hub at Water Lane can be defined in the future, in consultation with the local community etc, as per code M02.

Name	Organisation	Comment	Response
		suits nobody's needs. A study should be commissioned to see what is most appropriate, a heritage centre or perhaps working with the potential science centre or some other maritime purpose.	
-	Sport England	a. Sport England welcome this principle around connected culture. It helps to support the AD3 principle around Activity for All and will support the ongoing stewardship of the space. We would like to note the need for spaces to be flexible to adopt to changing needs within the community (Seeing principle 9 of AD3)	Support noted and comment noted. The second bullet point of code C02 has been amended to refer to the need for spaces to be "multi-functional".
-	Historic England	C05 – City Cultural Hub We support this code insofar as it indicates that proposals should use the unique character of the area including the Canal and other built heritage to create a destination.	Support noted.
-	-	1. C01 - The building should reflect the natural environment i.e. brick, glass and be in keeping with existing old style buildings.	Comment noted. New code L29 notes that use of materials will be considered at detailed planning application (against design policies in the Exeter Local Plan First Review and Core Strategy). Code M01 requires development to respond to context, including heritage assets.
-	-	C01 – full of good ideas but the photo entitled "Maritime heritage of the Exeter Ship Canal" hardly sparks a vision of what could be, rather than 'heritage' it gives the impression of a forgotten dumping ground.	Comment noted. The SPD has been amended to include a new, more appropriate, image.
		C02 – again full of good positive ideas.	Support noted.
		C03 – the rent for this creative type of building use would need to be within reach of the creative community as generally it isn't a high-income activity/business.	Comment noted. Code W08 requires development proposals to explore opportunities to re-purpose existing buildings where suitable to provide affordable space for businesses and other organisations.

Name	Organisation	Comment	Response
		C04 – ‘meanwhile’ is all very well and to be encouraged rather than buildings remaining empty but how about those displaced by planning applications e.g.: St Thomas Library, Ride On Cycles or the Ten Pin Bowling Alley – all are community activities to be encouraged whether free at point of service or not.	Comment noted. Code W01 requires development proposals to accommodate a mix of uses, which could include community and leisure facilities. Code W03 does similarly for the Neighbourhood Centre.
		C05 – great idea and to be encouraged but to have a ‘destination’ it is necessary to get there which requires more than just the new Marsh Barton railway station and a flaky bus service that the council frequently has to subsidize.	Comment noted. Codes within section 4.5 the SPD seek to improve active travel and public transport links to Water Lane. Public car parking will be retained at Haven Banks 1 car park to support local tourism and leisure use of the Canal and Quayside.
-	Exeter Community Centre Trust	C01 - C05 Add stipulation of 1% at least for arts/culture	Comment noted. A percentage has not been added. Codes C01-C05 will enable culture/arts-related development at Water Lane.

Q37. Are there any other comments you would like to make on the Liveable Water Lane SPD?

Name	Organisation	Comment	Response
-	Friends of Exeter Ship Canal	<p>Overview and general comment: A separate approach necessary for the Canal</p> <p>The SPD identifies (p. 8) Water Lane as brownfield land with a variety of uses. A plan shows a length of Exeter Ship Canal, cut off at the Canal Basin, within the site boundary. Throughout the draft there is emphasis on the site being ‘defined by the water’.</p> <p>The Canal and its Basin are an integral structure, in turn part of another, the Port of Exeter. They are also working infrastructure. The water of the Canal and Basin is not separable in terms of use from the land that borders it.</p>	<p>Comment noted. The Council understands the suggestion of the need to think about the Canal in a comprehensive way. Indeed, the thinking behind the Liveable Water Lane SPD sits within the wider context of its thinking about the Canal. However, the Council will not be preparing a specific SPD for the Canal. An SPD must hang off, and be supplementary to, existing planning policies in a full local plan. The current local plan for Exeter, made up of the Local Plan First Review and the Core Strategy, does not include a policy hook for further documents covering the Canal as a whole – therefore there is no policy for a Canal SPD to supplement. In addition, the majority of the Canal will remain unchanged going forward</p>

Name	Organisation	Comment	Response
		<p>What happens on this land indelibly affects the waterway's ability to function. This is frequently missed in the draft SPD.</p> <p>The Friends welcome the development of Water Lane and believe opportunities for a 'true waterside community' are genuine and compatible with an unimpeded working waterway next door with advantages to both if consideration is given to both. The importance of this is underlined by Exeter's designation as a functioning Heritage Harbour. For there to be a true waterside community at Water Lane there must be a true living waterway and not the near equivalent of a linear boating lake in a park. The Friends believe the new community can be integrated beneficially with the working waterway if the overwhelming case for a strategic approach to the Canal is also accepted by the City Council.</p> <p>The Friends propose therefore a separate SPD for the Canal as a whole, with a substantial part of it supplementary and complementary to the Water Lane SPD. It is not just to protect and preserve the Canal's function but to maximise the buzz, interest and well-being that living by a thriving working waterway creates for the community.</p> <p>While it is accepted that this is strategic rather than a matter for the design code, the draft SPD covers both aspects. The Canal Plan could be prepared without undue delay, with input by key stakeholders, because of the number and quality of papers on the subject already produced, most recently the Exeter Ship Canal and Heritage Harbour Route Map, which could form much of</p>	<p>and therefore there isn't a need to respond to change in the same way as is the case at Water Lane. The Council must also prioritise other projects, in particular the Exeter Plan, in order that the wider-planning policy for the city is kept sufficiently robust.</p>

Name	Organisation	Comment	Response
		<p>the content.</p> <p>The following response by the Friends of Exeter Ship Canal to the draft Liveable Water Lane SPD covers concerns about its impact on the functionality and operation of the waterway and where proposed land uses conflict and underlines the case for a separate Canal Plan alongside the development framework for the Water Lane area. The Friends' responses are in the spirit of positive consideration for both.</p>	
		<p>Stewardship (p. 134): The proposal that some streets and spaces 'might lend themselves to private management and control by residents' needs greater clarification: as does the proposal that other spaces may have 'stewardship' through a trust or community interest company (CIC). We support the full adoption of all roads, thoroughfares, and public spaces. Community participation in maintenance of green spaces is good and would be a matter for local discussion and agreement with the City Council, not the developers.</p>	<p>Comment noted. Code Q17 has been amended to give greater clarification on the approach to management and adoption of areas and infrastructure at Water Lane.</p>
-	Cillarda Group Exeter Ltd	<p>1.1 This document presents comments in respect of the draft Liveable Water Lane Supplementary Planning Document (draft SPD) on behalf of Cillarda Group Exeter Ltd, owners of 6.38 ha of land between Water Lane and the mainline railway, immediately south of Tan Lane.</p> <p>1.2 The land at Water Lane has been allocated for mixed use redevelopment for many years but there has been no progress in delivering regeneration of this underused area close to Exeter Quay and the city centre. One of the barriers to progress has been fragmented land ownerships.</p>	<p>Support noted and objections noted. The SPD has been amended following further work to consider options for the potential size and location of the primary school and the means of access to the northern area of Water Lane. This has included preparation of a Primary School Options Appraisal and two technical notes focussing on access and movement, informed by discussions with the Cillarda Group and other stakeholders at Water Lane including Devon County Council. The Primary School Options Appraisal explores options for locating the school and its size and the conclusions are reflected in the SPD (e.g., in the Regulating Plan, Development Framework and code W04). The technical</p>

Name	Organisation	Comment	Response
		<p>Cillarda has therefore assembled a large area into one ownership to enable delivery.</p> <p>1.3 Through a process of pre-application dialogue with Exeter City Council, two rounds of extensive public consultation and advice from two design review panel sessions over a period of two years, a mixed-use development proposal has been drawn up and submitted for outline planning permission, with all matters reserved for future determination except the mix and quantum of uses and the principal access. The outline planning application (ref. 23/1007/OUT) was submitted on 17 August 2023 and is accompanied by a set of parameter plans to guide subsequent detailed design.</p> <p>1.4 Throughout this document, the area covered by the outline planning application is referred to as Water Lane South. Land to the north, comprising the former gasworks site and land at Michael Browning Way, which accommodates car parking and commercial premises, is referred to as Water Lane North.</p> <p>1.5 The Vision for Water Lane South is for: A liveable, waterside community, within a distinctive new city quarter of character and identity, well connected to and integrated with its surroundings, that is a place people enjoy being in for living, working and community life and, which helps to protect and enhance the natural world.</p> <p>It will:</p>	<p>notes explore options for accessing the area of the site on the northern side of Water Lane and the conclusions are also reflected in the SPD (e.g., in codes A03, A17 and A18).</p> <p>A Flood Access and Egress Study is being prepared by consultants for the Council, with the involvement of stakeholders including the Environment Agency and key landowners at Water Lane, to ensure that redevelopment of the site is undertaken in accordance with national planning policy on food risk. The supporting text to code A13 states that “The detailed and final solution (to flood access and egress) will be determined by the Study and the planning application process, with close collaboration needed between applicants and relevant authorities”.</p> <p>Ongoing collaboration between the key stakeholders at Water Lane will be necessary to determine the final location and size of the primary school, the means of access to Water Lane North and the flood access and egress solution. Developer contributions will be required to help fund delivery of the school, the flood access and egress solution and access/movement infrastructure.</p>

Name	Organisation	Comment	Response
		<p>Be Inclusive: Providing accessibility for all, a range of uses and facilities to serve the new and existing communities and opportunities for training, jobs and local procurement during its creation.</p> <p>Enable Low Impact Living: By making walking, cycling and public transport use attractive and convenient, providing for use of low emissions vehicles, ensuring energy efficient buildings, zero carbon heat and power and spaces and connections for wildlife.</p> <p>Prioritise People in its Spaces, Streets and Connections: As a place to walk, cycle, relax and socialize, in a setting that is green and animated by varied and active street frontages.</p> <p>Provide Homes for a Variety of Needs and Aspirations: Including homes to buy and rent, with affordable tenures and offers for retirement living and for students.</p> <p>Have a Thriving Community Life: As a Ten-Minute Neighbourhood providing a place to live, work, enjoy and socialise, with a mix of buildings and spaces accommodating a variety of uses and activities.</p> <p>Create Character and Identity: Enhancing the leisure, amenity and bio-diversity value of the waterside and drawing on elements of Exeter's character to inform a contemporary design approach that expresses the underlying sustainability of the place, in establishing a new and distinct part of the city.</p> <p>Add to and Complement Exeter's Form and Existing Neighbourhoods: Using high density to optimize the sustainability of the location and create new skyline, whilst providing views to the hills beyond, supporting and integrating with adjacent communities, and achieving</p>	

Name	Organisation	Comment	Response
		<p>linkages and synergies with the wider city.</p> <p>Be Deliverable: Through collaborative working and shared ambition with Exeter City Council, Devon County Council, involvement of stakeholders and partnerships with local organisations, to create a development mix and quantum that is viable through jointly agreed delivery solutions.</p> <p>2. Principal Comments on the draft SPD</p> <p>The purpose of the SPD to ‘...to guide the delivery of high quality, co-ordinated redevelopment and placemaking in the area’ is supported. However, there are three principal and interconnected elements of the draft SPD that we consider fundamental to the document’s role in helping to enable delivery and the achievement of sustainable development in line with the central purpose of the planning system, as set out in the National Planning Policy Framework. These elements are the location options for a new primary school (W02, p53), the access to the northern area (A11- Mobility coding plan, A14 Water Lane access and movement, A19 – Michael Browning Way and A20 – Northern site access) and the strategic flood event access and egress route (p 93). On these three elements, the draft SPD is objected to for the reasons set out below.</p> <p>7. Conclusions</p> <p>7.1 We welcome the aim of putting in place a framework and design code to help achieve a high-quality liveable</p>	

Name	Organisation	Comment	Response
		<p>neighbourhood at Water Lane. However, we have significant concerns in respect of some elements of the draft SPD and their impact upon the viability and deliverability of the current outline planning application proposal for Water Lane South, as set out above.</p>	
-	<p>National Grid (NG) and Wales and West Utilities (WWU).</p>	<p>We are instructed by our clients, National Grid (NG) and Wales and West Utilities (WWU), to submit the enclosed representations to Exeter City Council in respect of the current consultation on the Liveable Water Lane Supplementary Planning Document (SPD) (hereinafter referred to as the 'Draft SPD').</p> <p>As discussed further below, NG and WWU are the owners of the operational Gasworks site at Water Lane, for the avoidance of any doubt. This, as can be clearly seen, forms a considerable part of the land forming the Water Lane redevelopment area, which is one of the largest sites within the Council's Liveable Exeter initiative. Our clients have engaged with senior members of Exeter City Council on a number of occasions over the last two years in respect of the future operations of the gas infrastructure at the Gasworks site and future redevelopment plans for the site, and further details on this are provided below.</p> <p>Whilst the overarching aspirations of the Draft SPD are welcomed and supported by our clients, for the reasons set out below, we object in the strongest terms to the preferred location of a primary school at the southern part of the operational Gasworks site.</p> <p>Description and Existing Function of The Site</p>	<p>Support noted and objections noted. The SPD has been amended following further work to consider options for the potential size and location of the primary school. This has included preparation of a Primary School Options Appraisal, informed by discussions with National Grid, Wales and West Utilities and other stakeholders at Water Lane including Devon County Council. The Primary School Options Appraisal explores options for locating the school and its size and the conclusions are reflected in the SPD (e.g., in the Regulating Plan, Development Framework and code W04). Devon County Council have confirmed that a new primary school is necessary at Water Lane and ongoing collaboration between the key stakeholders will be necessary to determine its final location and size. Developer contributions will be required to help fund delivery of the school.</p>

Name	Organisation	Comment	Response
		<p>The Gasworks site is bound to the south-east by Cotfield Street, to the south-west by Water Lane and to the north-west by an industrial estate. Haven Road and the River Exe are situated to the north-east of the site. The extent of the Gasworks site can be seen in Image 1, below.</p> <p>As the Licensed Gas Transporter for the area, WWU must maintain a reliable gas supply to the City of Exeter and some 33,000 residential customers, together with around 800 industrial and commercial users. The responsibilities of WWU extend to ensuring provision of such supply and ensuring any future modifications supports and meet the high engineering and safety standards to be expected for infrastructure of this nature.</p> <p>The Gasworks site contains an existing Pressure Reduction Station (PRS), and associated gas mains, which are required to allow our client to discharge its statutory function. The key infrastructure here is the existing high-pressure gas main, which is protected by way of an easement. For health and safety reasons, there are 'build and proximity distances' which materially restrict any building operations both on and off site, including the wider Water Lane area. This has previously been communicated to the Council.</p> <p>Engagement with the Council</p> <p>Our clients have been actively engaged in discussions with senior members of the Council over the last two years, and a list of meetings attended is provided below at Table 1.</p>	

Name	Organisation	Comment	Response
		<p>This excludes follow-up email correspondence and telephone calls.</p> <p>Within the meetings, the current development restrictions in relation to the existing gas equipment and associated mains was regularly discussed. In addition, discussions were had in respect of any potential options associated with rationalisation of the gas mains and replacement of the PRS, in the context of the wider proposals for the Water Lane redevelopment area. In our meeting on 17 October 2023 with officers, we presented the constraints imposed by the existing gas infrastructure, and the studies undertaken by WWU for the PRS relocation and gas mains rationalisation.</p> <p>Our clients have continued to manage the site and have resisted demands for the intensification of its operational use and third-party lettings as they wish to focus their attention on the redevelopment of the Water Lane area.</p> <p>From an operational perspective, the existing PRS and associated infrastructure does not need to be replaced and can remain operational in its current location, at the north-western part of the Gasworks site.</p> <p>Image 2, below, shows the current location of the PRS and the HSE blast zones associated with the below ground gas mains. These comprise the 'inner zone' (pink), the 'middle zone' (green) and 'outer zone' (blue). With the PRS retained in its existing location and with the inner and</p>	

Name	Organisation	Comment	Response
		<p>middle zones comprising a significant part of the centre of the site, any future redevelopment of the wider site, which is so significant to the aspirations of the Water Lane development area, would be prohibited.</p> <p>By comparison, Image 3, below, identifies the HSE blast zones with the PRS relocated to the southern part of the site and the below ground gas mains rationalised to suit. Critically, only a small area of the southern part of the site would fall within the inner and middle zones, unlocking the majority of the site and wider area for redevelopment.</p> <p>There are benefits beyond the site boundary too, as the gas mains along Water Lane could be replaced, subject to third party funding, in modern, more suitable material once a new connection point is established to the new PRS. This, in turn, will significantly reduce the associated blast zones. This is discussed below.</p> <p>With regard to our clients' development proposals at the Gasworks site, a robust marketing strategy and developer selection process has been undertaken and the Council was kept fully informed during this process and attended the final interviews with the three shortlisted developers. As the Council is aware, our clients now have an indicative scheme for the redevelopment of the Gasworks site, in conjunction with their preferred developer partner, Cubex, that provides c. 600 residential units together with ancillary commercial space. Crucially, the delivery of residential units under this proposed scheme allows for the on-site relocation of the PRS, gas mains rationalisation and a</p>	

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		<p>proposed new high-pressure connection linked to the wider Water Lane area.</p> <p>Alongside this, detailed analysis has been undertaken over the last two years in respect of the various options for the relocation of the PRS and as discussed further below, the only acceptable option would be for the PRS to be relocated to the southern corner of the site. The proposed Cubex scheme works with the parameters associated with the relocation of the PRS. Furthermore, it not only supports the Council's housing provision targets, but also includes appropriate self-financing provisions supporting the essential relocation and rationalisation of the gas mains and the PRS together with a comprehensive land remediation strategy to deal with historic ground conditions, in a managed timeframe.</p> <p>As has been maintained in discussions with officers, it is our clients' vision that the gas infrastructure rationalisation proposals, together with the remediation at their site, will act as a catalyst for the wider development aspirations for the wider area. This is because these works, subject to required costs being met by third parties, will unlock the remainder of the Water Lane development area as they facilitate the necessary alterations to the gas mains and associated potential future gas infrastructure beyond the site boundary.</p> <p>Given the good working relationship that our clients felt that they had developed with the Council over the last two</p>	

Name	Organisation	Comment	Response
		<p>years, it is therefore extremely disappointing to have been advised, without any prior notification, that the Council is now recommending provision of a new primary school at the southern part of the Gasworks site, which will effectively undermine the viability position and therefore the ability to deliver any of the required rationalisation and improvement works set out above.</p> <p>As set out within Table 1, our clients have had numerous meetings with the Council, and specifically, no mention of the primary school allocation was made in the Teams discussion held as recently as June 2023, despite our clients then becoming aware of the draft allocation only shortly after in the 15 September meeting, immediately prior to the Draft SPD being approved by the Council's Executive.</p> <p>Relevant Policy Context</p> <p>Local Plan First Review (2005) (Saved policies)</p> <p>The Gasworks site is identified within the Proposals Map as being suitable for a mix of tourist, leisure, housing, employment and retailing. Policy KP6 sets out, amongst other things, that development for these types of uses in the Water Lane area could be acceptable, provided that they do not inhibit existing industry.</p> <p>With this in mind, it is noteworthy that the proposed removal of the below ground gas main, which currently runs through the site and beyond, will benefit the existing</p>	

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		<p>industries along Water Lane as it will reduce and potentially remove existing restrictions in terms of build and proximity distances with this main.</p> <p>The supporting text at Paragraphs 14.25 – 14.27 set out that housing will be permitted provided there is scope to introduce landscape features or open space as a buffer between housing and existing industry where this is considered to be necessary.</p> <p>The Core Strategy (2012)</p> <p>Core Strategy Policy CP17 sets out that development in the Water Lane Regeneration Area will, amongst other things, take a comprehensive approach to the delivery of development which ensures that new housing is compatible with other existing land uses in the area, particularly industry.</p> <p>Full Draft Exeter Plan (currently being consulted on until 15 Jan 2024)</p> <p>Draft Policy H2 (housing allocations and windfalls) identifies ‘Water Lane – Site 15’ as a ‘strategic brownfield development site: mixed use’.</p> <p>Water Lane – Site Ref 15 details can be summarised as:</p> <ul style="list-style-type: none"> •The majority of the proposed Water Lane allocation is already identified for mixed use, residential-led redevelopment in the Exeter Local Plan First Review. The 	

Name	Organisation	Comment	Response
		<p>site is also included in the Liveable Exeter initiative. The City Council proposes to roll this allocation forwards into the Exeter Plan.</p> <ul style="list-style-type: none"> •The proposed site allocation will be supported by a Liveable Water Lane Supplementary Planning Document (SPD), which is currently being prepared by the City Council and is also subject to consultation. The SPD will contain a development framework and design code for the site, alongside strategies for access and utilities provision, to help ensure that Water Lane is redeveloped in a comprehensive, coordinated way and at a high quality which reflects the Liveable Exeter principles. •The requirements for the school are as follows: A 2-form entry primary school including early years and communal space for children's centre service provision and contributions to secondary and special educational needs provision. <p>Representations to The Draft Liveable Water Lane SPD</p> <p>The Illustrative Development Framework is set out at Section 3.2 of the Draft SPD and is provided below, at Image 4.</p> <p>Further, the Regulating Plan (Section 4.2 of the Draft Liveable Water Lane SPD), provided at Image 5, below, proposes the following uses for the Gasworks site:</p> <ul style="list-style-type: none"> •Primary School (W04 – preferred location); •Residential led development; 	

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		<ul style="list-style-type: none"> •Neighbourhood Centre (W03); •Employment Opportunity Area (W07); •Boat Storage (W05 – preferred location); •Local Green Space (S12) •Primary mobility hub (A05 and A06) •Water Spaces (W10 – W12) <p>A number of active streets are also proposed.</p> <p>Other Designations at the Gasworks site</p> <p>As detailed within the Regulating Plan (Section 4.2 of the Draft Liveable Water Lane SPD), provided at Image 5 above, the following uses, alongside a number of active streets, are proposed for the Gasworks site:</p> <ul style="list-style-type: none"> •Primary School (W04 – preferred location); •Residential led development; •Neighbourhood Centre (W03); •Employment Opportunity Area (W07); •Boat Storage (W05 – preferred location); •Local Green Space (S12) •Primary mobility hub (A05 and A06) •Water Spaces (W10 – W12) <p>We have reviewed the relevant sections of the Draft SPD in respect of the above designations. In principle, the range of proposed uses across the Gasworks site is supported, which will complement residential development, however, this is subject to further details being provided in due course. Critically, the provision of these uses should not</p>	

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		<p>jeopardise access to the existing/ future gas infrastructure, nor should it preclude the southern part of the Gasworks site being used for the replacement PRS which, as discussed, is fundamental to the redevelopment of the wider Gasworks site and beyond, and, of course, the continued provision of gas supply to the Exeter area.</p> <p>Pending Outline Application</p> <p>Officers will be aware that there is an outline planning application (ref: 23/1007/OUT) currently pending consideration by Exeter City Council in respect of 'demolition of existing buildings and structures and residential-led mixed use development providing new dwellings and workspace, 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' at Water Lane (South), Exeter.</p> <p>Of note, there is a holding objection from the Health and Safety Executive (HSE) relating to the hazard zones associated with the existing gas main that runs through the site and, as officers will know, links to the existing PRS. The proposals cannot therefore progress until such time as the HSE holding objection is overcome. The proposed rationalisation of the PRS and associated infrastructure</p>	

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		<p>could facilitate this, allowing a connection to the PRS and then in turn replacement of the existing gas main with alternative 'thick wall' pipe which would considerably reduce the size of the safety zones, and, therefore, facilitate more development along its length.</p> <p>Linking back to the proposed position of the school, it is noteworthy that the HSE response raises concerns about the proposed 'college establishments' in this application, which lie partly within the middle and outer zones of the major hazard establishment and are considered to come under the development type 'indoor use by public'.</p> <p>HSE's advice sets out, inter alia, that: "HSE's assessment therefore indicates that the risk of harm to people at the proposed development is such that HSE's advice is that there are sufficient reasons, on safety grounds, for advising against the granting of planning permission for the outline planning application".</p> <p>The advice goes on to say that: "HSE would not advise against the granting of planning permission for the outline planning application if the following conditions were to be included in the permission:</p> <p>...Any Indoor Use by Public development located within the combined inner/middle zone of the Kenn/Exeter pipeline must have a total floor space of less than 250 m²".</p> <p>The preferred location for the primary school, at the southern part of the Gasworks site, would fall within the</p>	

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		<p>inner zone of the major hazard sites, and it is therefore obvious that in its preferred location the school could not be delivered. This highlights again why it is so critical that the existing and future gas infrastructure must be considered as a priority, ahead of, or at least as part of, considerations for the wider redevelopment of the Gasworks site and beyond. And without sensible consideration as to the cost, funding, deliverability and timescales for this, redevelopment of the wider area cannot progress.</p> <p>Ongoing Engagement</p> <p>Our clients continue to try and engage with the adjacent landowners and a meeting has been arranged for 11 December with the applicant behind the pending outline application.</p> <p>In addition, our clients are very happy to continue to work with the Council to try and find an alternative solution / location for the proposed school having regard to the constraints and development challenges set out. Indeed, in response to a letter sent by our clients to the Council's Chief Executive in October 2023, we are pleased that the Council has agreed to meet with senior representatives from NG and WWU in January 2024 to discuss the future of the Gasworks site.</p> <p>PRS Planning Application</p>	

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		<p>As referenced above, in order for any redevelopment of the Gasworks site to take place, the existing PRS and associated infrastructure must be relocated. The identified location on the Gasworks site, informed by detailed studies and specialist consultant input, will allow for gas main rationalisation and for WWU to continue to supply Exeter with gas, as per their obligations as the Licenced Gas Transporter.</p> <p>As such, Firstplan has been instructed, on behalf of NG and WWU, to prepare and submit a planning application for the replacement PRS and associated infrastructure in the southern corner of the site. This will be submitted concurrently.</p> <p>Summary of Position</p> <p>Our clients will continue to pursue communication with the Council and with adjacent landowners in respect of the future of the Gasworks site, and the attendance by these respective parties at the forthcoming meetings is very much welcomed.</p> <p>The general aspirations of the Draft Liveable Water Lane SPD are supported by our clients however, in particular, the preferred siting of a primary school at the southern part of the Gasworks site is objected to in the strongest terms.</p> <p>The proposed primary school would undermine the extensive works that our clients have undertaken to-date</p>	

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		<p>with Cubex, rendering the site development unviable. Instead, the site will remain in operational use. This, in turn, will prevent the relocation of the PRS and the gas mains and the associated benefits that would, as we have set out, result, both on this site and in the wider Water Lane regeneration area.</p> <p>Indeed, by retaining an operational use of the site and the gas main in its current form, the development opportunity along Water Lane would be sterilised (as is evident by the current HSE holding objection to the pending outline planning application 23/1007/OUT). This ultimately means that the content of the Liveable Water Lane SPD would be undeliverable and the projected housing numbers proposed within the SPD cannot be relied on.</p> <p>Therefore, at this stage we have no alternative but to request that the allocation for the preferred location of the primary school is removed and that an alternative location is sought. Our clients have confirmed that they are prepared to actively engage with the Council regarding a feasible alternative location.</p> <p>I trust that the above provides clarity on our clients' positions. We look forward to further engagement, both in respect of the forthcoming meetings with the Council and landowners, and in future consultation on the Draft Liveable Water Lane SPD in due course.</p>	
-	-	<p>I think that the document needs to be condensed considerably as it is far too long. If this does happen, then it is likely that the parts that are kept are the coloured panels. However, the coloured panels are very generic and not specific. The specific information is mostly in the text</p>	<p>Comment noted. The SPD has been amended to improve its structure. The Council is satisfied that the amended SPD is of a length, structure and level of detail appropriate to a development framework and design code.</p>

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		<p>on the white pages, so if these are removed then the detail that is needed will be excluded. At the consultation I asked Katherine Smith is the SPD comprises the coloured panels, or the whole document. She confirmed that the SPD is the whole document. If this proves not to be the case then it is essential that the detail in the text on the white pages is retained in the SPD.</p>	
		<p>The SPD needs SMART objectives specific, measurable, achievable, realistic, timely. There is a lot of woolly aspirational wording in the document. This makes it very easy for developers to say they have met their interpretation of the document. Heights, distances, materials, use etc need to be specified clearly so that the developers can be tested against specific requirements.</p>	<p>Comment noted. Where appropriate under existing adopted planning policy, codes within the SPD have been amended to provide greater clarity and/or specification.</p>
		<p>Important need for a masterplan National Model Design Code https://www.gov.uk/government/publications/national-model-designcode which is in two parts, the coding process and guidance notes.</p> <p>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.</p> <p>The Water Lane area really needs a Masterplan to set out the main requirements:</p>	<p>Comment noted. The Council is satisfied that the development framework and design code (as amended following consultation), together with emerging and existing planning policies in the Exeter Local Plan First Review, Exeter Core Strategy and Exeter Plan, will enable the delivery of a high-quality new neighbourhood at Water Lane.</p>
		<p>Traffic flows within the site:</p> <p>Cycling commuter route to be separated from pedestrians and slower cyclists. Cycling motorway along the edge of the</p>	<p>Comment noted. The SPD does not identify a cycling commuter route and it is not proposed to create a segregated</p>

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		<p data-bbox="562 236 1274 304">railway line all the way to MB station and on to Bridge Road. Pedestrians and fast cyclists should not share routes.</p> <p data-bbox="562 587 1274 927">The site only has one entrance / exit for cars. This is going to cause a complete gridlock right from the beginning, as the site is often gridlocked now when Alphington Road is busy. Some flow of traffic is needed even if it is traffic calmed. I suggest Tan Lane tunnels become permitted for vehicle traffic, one direction per tunnel. Also, a road exit for the site into Marsh Barton via Clapperbrook Lane next to MB station. This would require an extension to Foundry Lane to the Marsh Barton station bridge.</p> <p data-bbox="562 975 1274 1118">The site is designated as a low traffic area. While many of the residents may not have cars, they will receive deliveries: there will be an enormous number of deliveries of groceries, and vehicles from Amazon, Deliveroo etc.</p> <p data-bbox="562 1166 1274 1378">The Southern zone of the site is narrow and may not be wide enough to accommodate the tow path for pedestrians and slow cycles, as well as the commuter cycle lane, so residential developments may need to be restricted in this area. Through travel routes have to be accommodated.</p>	<p data-bbox="1296 236 2029 555">cycle lane adjacent to the railway line. New code A02 shows an LCWIP route/feeder route running along Water Lane and code A15 explains that this will be the main active travel route through the site. Code A28 also requires options to be explored to widen the Canal towpath to accommodate cycle use and an increase in pedestrian use. Code A02 has been amended to clarify that segregation of users will be sought in accordance with Local Transport Note 1/20 and where space in the carriageway allows.</p> <p data-bbox="1296 595 2029 914">Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on road access described by the SPD accord with this Vision. Use of the Tan Lane underpass will be restricted to public transport, cyclists and pedestrians. Use of Clapperbrook Bridge will be restricted to local traffic (e.g., accessing Bromham's Farm and the Double Locks), cyclists and pedestrians and is also safeguarded for potential future public transport provision.</p> <p data-bbox="1296 994 2029 1058">Comment noted. Delivery cars/vans will be able to access Water Lane via the Alphington Road junction.</p> <p data-bbox="1296 1169 2029 1345">Comment noted. Code A28 requires options to be explored to widen the Canal towpath to accommodate cycle use and an increase in pedestrian use. The SPD does not identify a cycling commuter route. Through-travel routes are identified for active travel and public transport.</p>

Name	Organisation	Comment	Response
		<p>It is important that all roads on the site are to be fully adopted roads. In areas where roads are not adopted can cause all sorts of difficulties e.g., visitors are not permitted to enter, or allowed to park, residents have to pay service charges to maintain the road etc. Issues with unadopted roads have arisen in Pinhoe.</p>	<p>Comment noted. Page 26 of the SPD explains that adoption of streets by the local highway authority is preferred, in accordance with Devon County Council advice. Code Q17 has been amended to clarify the approach to managing and maintaining areas and infrastructure at Water Lane if these are not adopted. Code A05 is clear that gated developments will not be permitted and that unadopted streets must allow public access.</p>
		<p>Traffic flows outside the site After Cricklepit Bridge: alley next to Puerto Lounge is far too narrow, at only 2 metres wide, for pedestrians, cycles, cargo bikes going in both directions. Also, this alley floods regularly and is a dark unpleasant place.</p> <p>Mallinsons Bridge needs to be replaced. However even if Mallinsons Bridge is replaced it leads to the Fish Quay which has cobbles and is not a good through route. Serious need for another main pedestrian / cycle route into the city centre.</p> <p>The developments near Alphington etc are going to 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. 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.</p> <p>River / canal crossings need to permit a much larger traffic of pedestrian / cyclists and be wide enough for 2 cargo bikes to pass. How old / strong is Trews Weir footbridge to</p>	<p>Comment noted. Code A30 identifies connections to Cricklepit Bridge as a key off-site active travel link that development proposals should help to improve.</p> <p>Comment noted. Devon County Council has now received funding to enable replacement of Mallinsons Bridge. Code A30 identifies connections to Cricklepit Bridge, including from the Quay, as a key off-site active travel link that development proposals should help to improve.</p> <p>Comment noted. The measures contained in the SPD are intended to accommodate an increase in cycle use through Water Lane.</p> <p>Comment noted. Code A30 identifies improvements to bridges across the Canal and River Exe as a key off-site active travel link that development proposals should help to</p>

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		<p>withstand a huge increase in pedestrian traffic? Already when people run over it shakes quite considerably.</p> <p>A traffic impact assessment needs to be undertaken, taking into account the flows from outside the site, e.g., from the new developments in Teignbridge Council area. I have learned that this would be the responsibility of DCC, but there is no sign of the plan being undertaken.</p>	<p>improve. Code A27 requires provision of a new active travel crossing of the Canal.</p> <p>Comment noted. In accordance with the National Planning Policy Framework and the Council's existing Sustainable Transport SPD, all development proposals at Water Lane that generate significant amounts of movement will be required to provide a travel plan, and planning applications will be required to be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be addressed.</p>
		<p>Is the solar farm is going to be located next to the canal for the long term? Once the city builds on the Water Lane site, and all the Matford site becomes full I think the solar farm site will be built on. In which case the site should be included in the Masterplan now, even if it is a long-term objective.</p>	<p>Comment noted. The Council has no plans to move the solar farm.</p>
		<p>Exe Water Sports Association site at 62 Haven Road W02, P53 The buildings of Exe Water Sports Association at 62 Haven Road are shown in yellow as allocated for residential led development. These should be shown as for water related sports facilities.</p>	<p>Comment noted. Code W02 has been amended to show 62 Haven Road as a site for residential-led development, with an opportunity for water-related uses fronting the canal basin (e.g., at ground level). The buildings and facilities used by the water sports clubs are, in planning terms, both community and sport facilities. As such, they are protected against loss by policy CP10 of the Exeter Core Strategy (under which the Council would expect any planning application to redevelop these buildings and facilities to provide or contribute towards the provision of new and improved buildings and facilities) and policy L7 of the Exeter Local Plan First Review (under which the loss of sporting facilities which serve a local area will not be permitted if this would harm sports opportunities in the area). These two policies are proposed to be replaced by policy IC3 of the emerging Exeter Plan, which states that</p>

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			existing services and facilities that meet community, social, health...cultural, leisure and recreation needs will be protected, unless it can be demonstrated that they are surplus to requirements or sufficient/improved provision is to be provided. It also states that proposals to provide new or improved community services and facilities will be supported. Therefore, the water sports clubs' buildings and facilities are afforded a significant amount of protection under both the existing and emerging development plan.
		Heritage Harbour Route Map: The SPD should be made compatible with the Heritage Harbour Route Map.	Comment noted. The Heritage Harbour Route Map is not a planning document and is not adopted as Council policy. However, the area's Heritage Harbour status is now referenced in the Vision for Water Lane and section 2.1 of the SPD.
		Citizens' Panel: 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 comments on the SPD.	Comment noted. Page 155 has been amended to make this clearer.
		Mobility: the method of separating the fast commuter cyclists from the slower travellers was by having a "cycling motorway" along the edge of the railway line.	Comment noted. The SPD does not identify a cycling commuter route and it is not proposed to create a segregated cycle lane adjacent to the railway line. New code A02 shows that an LCWIP route/feeder route runs along Water Lane and code A15 explains that this will be the main active travel route through the site. Code 28 also requires options to be explored to widen the Canal towpath to accommodate cycle use and an increase in pedestrian use. Code A02 has been amended to clarify that segregation of users will be sought in accordance with Local Transport Note 1/20 and where space in the carriageway allows.
		Comparison with the Riverside + Ludwell Valley Parks Master Plan 2016-2026: This Masterplan was the subject of	Comment noted. Grace Roads Fields is a greenfield site in flood zone 3 and, in planning policy terms, is therefore part of

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		<p>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:</p> <ul style="list-style-type: none"> · 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. I was previously advised that the campsite could not be located so close to the incinerator because there are regulations that prevent it. I have done some research and 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, as shown on P66 of the Valley Marks Master Plan. 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. 	<p>the River Exe's functional floodplain. A campsite is classified in the National Planning Framework (NPPF) as a use that is 'more vulnerable' to flood risk. The NPPF is clear that such uses are not suitable in flood zone 3 and should not be granted planning consent. Therefore, it would not be appropriate for the Liveable Water Lane SPD to identify Grace Road Fields as suitable for a campsite. Grace Road Field is also within the Waste Consultation Zone of the Exeter Energy from Waste (EfW) Facility, identified in the Devon Waste Plan. It is highly likely that a campsite within the Waste Consultation Zone would be impacted by the noise, odour and dust etc. generated by the operations of the EfW and therefore this would not be a suitable use for the site. It is unlikely these impacts could be mitigated to an acceptable level. It is likely that Devon County Council, as the Waste Disposal and Waste Planning Authority, would object to such development on grounds that it would constrain the operation of the EfW Facility.</p> <p>Comment noted. Code S15 notes that uses being considered for Grace Road Fields include a canal basin/marina and that the Masterplan should be used for ideas and reference.</p>

Name	Organisation	Comment	Response
		<p>Word definitions P30 and P82 Legible and legibility In my world this relates to handwriting. Please provide meaning in planning. Spellings and word suggestions P33 it's its P34 it's its third paragraph P63 it's its line 2 of paragraph P82 meter metre P118 accpetable acceptable P130 café's cafés P130 meanwhile uses temporary uses P133 Country County P134 I It P149 to p154 citizen's citizens' P137 NSA Net site area P137 dph dwellings per hectare P137 GIA gross internal area P147 Members of the Exeter Canal and Quay Trust (ECQT) P153 stories storeys twice P153 waters water's</p>	<p>Comments noted. The glossary to the SPD now includes definitions of 'legible/legibility' and 'meanwhile use'. Spelling corrections have been made and abbreviations clarified throughout the document.</p>
-	-	<p>I'm replying via pdf because I find the CommonPlace website ECC use for consultations unusable. It is extremely difficult and cumbersome to engage with and needs a rethink. I'm a local resident, living on the opposite side of the River to the Water Lane development and will look out on to it. I'm also a transport planner with extensive experience of working on similar SPDs, development frameworks, and transport assessment for major developments around the country. All views are my own.</p> <p>Overall I strongly support the SPD and the principle of the development and support mixed use high density in this area of at least 200dph. We must build on brown field land</p>	<p>Comment noted. Whilst online consultation responses were encouraged, pdf response forms and reference paper copies were made available during the consultation at the Civic Centre, local libraries and exhibitions about the SPD.</p> <p>Support noted.</p>

Name	Organisation	Comment	Response
		<p>and increase densities, both to make attractive, loveable communities, and to try and prevent the sprawl of greenfield developments coming forward in East Devon and elsewhere in the Exeter Travel to Work area that will destroy valuable swathes of our natural environment with low density sprawl.</p>	
		<p>Given the development is adjacent to the Riverside Valley Park, SPD should include additional Biodiversity Net Gain requirements over and above national requirements and local plan requirements.</p>	<p>Comment noted. Local planning authorities are unable to require Biodiversity Net Gain requirements that exceed those set nationally. However, code S04 states that development proposals are expected to be ambitious in delivering BNG and exceed the minimum requirement wherever possible.</p>
		<p>Text on supporting the Riverside Valley Park masterplan on p118 is good but should be strengthened from "explore opportunities" to "must support initiatives".</p>	<p>Comment noted. The existing wording is considered to be appropriate.</p>
		<p>Also, I agree with a comment on CommonPlace that this links to the Exe Bridges Local Plan allocation, which proposed converting existing retail to residential. I think that is a big mistake and will further sever St Thomas from the city centre. There is a great opportunity to include mixed use there with leisure/retail, continuing the city centre across the bridge and into St Thomas. Residents of Water Lane and Marsh Barton developments will add significant leisure/retail demand and this can be catered for locally at the Exe Bridges site.</p> <p>The Local Plan also drops the ambition to convert one of the Exe Bridges to a green bridge and this should be reconsidered as it was a fantastic idea that could extend the quay and help rejuvenate both the bottom end of the town centre and the Cowick St area. Recreation of the old bridge in the centre of the two motor traffic bridges for ped/cycle could also be considered as an alternative] to</p>	<p>Comment noted. The SPD plans for the provision of a new Neighbourhood Centre at Water Lane, to include local retail facilities. Water Lane is also within walking and cycling distance of retail facilities in the city centre and Cowick Street local centre. Exe Bridges Retail Park is a proposed residential-led site allocation in the Full Draft Exeter Plan, but this could involve the retention of retail uses on the site, for example at ground floor level.</p> <p>Comment noted. The 'West Gate' allocation that appeared in the Outline Draft Exeter Plan consultation document was reduced in size to exclude Exe Bridges (and other areas) and renamed 'Exe Bridges Retail Park' in the Full Draft Exeter Plan consultation document. This amendment was made for reasons of viability and feasibility.</p>

Name	Organisation	Comment	Response
		provide a direct, more pleasant link from the High St to Cowick St.	
		Overall, some of the statements in the SPD are woolly or caveated with "where possible", which probably means developers will push back on things and the ambitions of the SPD won't be fully realised. The wording should be tightened up throughout and requirements quantified or better formalised.	Comment noted. Where appropriate under existing adopted planning policy, codes within the SPD have been amended to provide greater clarity and/or be more exacting.
		Given the constraints on the highway network, Exeter Transport Strategy and Net Zero 2030 commitments to reduce car use, and significant concerns from residents that will hinder any planning applications, the entire development should be car free. This is common in many other historic city centre locations including in Bath. The development is between two rail stations, on existing bus routes, national cycle routes, and a short walk to key destinations including the city centre and RD&E. There is no excuse to continue car dependency with this development, and a fantastic opportunity to set the bar for Exeter and showcase the city nationally by going for an ambitious car free development.	Comment noted. The Council does not consider it appropriate that Water Lane should be entirely car free. Car access to the area will still be required to support tourism, leisure activities and the planned new primary school and to serve existing residents and businesses. Delivering a large low-car neighbourhood at Water Lane will be a significant achievement.
		The design guide for these buildings will be critical. Need to avoid a repeat of the boring/unattractive designs on the newer parts of the quay. No more pink and beige please!	Comment noted. The SPD is intended to ensure that all new development at Water Lane is of high-quality design.
-	Devon County Council	<p>Thank you for the opportunity to comment on the Liveable Water Lane Supplementary Planning Document (SPD) - Development Framework and Design Code - Public Consultation Draft October 2023. This response provides the formal views of Devon County Council (DCC) and is separated into sections covering the following topics:</p> <ul style="list-style-type: none"> • Local education provision (including early years) 	Support noted.

Name	Organisation	Comment	Response
		<ul style="list-style-type: none"> • Waste planning • Highways and transport • Flood Risk • Adult social care • General presentation of the SPD <p>In summary we generally support the contents of the SPD however we are seeking further clarification with regards to certain aspects of Flood Risk which will need to be addressed before the SPD is published.</p>	
		<p>Local education provision (including early years)</p> <p>We support the contents of the SPD and in particular the content of policy W04 – Primary school. We would however ask that the wording of the first sentence of this policy is altered slightly to read: “A two-form entry primary school with early years provision and space for children’s services/ community use shall be provided at Water Lane” in order to provide a more solid commitment to its provision and taking into account how the specific name of physical children’s spaces can and will change over time. We would also like it noted at this stage that it is essential that further discussions are undertaken with the Local Education Authority to agree an acceptable school site size and would reiterate the requirement for provision of the appropriate contributions toward education infrastructure to provide certainty that the development will contribute to education infrastructure to fully mitigate the impact of the housing growth proposed.</p>	<p>Comment noted. Code W04 has been amended following further work to consider options for the potential size and location of the primary school and the means of access to the northern area of Water Lane. The amendments have taken post-consultation discussions with Devon County Council into account.</p>
		<p>Waste planning</p> <p>Section 1.2 sets out the planning policy framework for</p>	<p>Comments noted and support noted. Section 1.2 and codes W08, L18 (now L19) and Q03 have been amended accordingly.</p>

Name	Organisation	Comment	Response
		<p>Water Lane. Given the strategic importance of the waste management facilities in the surrounding area, the Devon Waste Plan, which forms part of the Development Plan, should be referenced, with specific mention of Policy W4: Waste Prevention and Policy W10: Protection of Waste Management Capacity.</p> <p>The SPD provides a Land use plan (Policy W02), which places residential development within close proximity to various waste sites, including the Exton Road recycling centre and the Exeter energy recovery facility. It is important that any development in this area achieves a suitable standard of amenity for residents and other users without constraining the various waste sites in the vicinity. It is acknowledged that Policy W08 – Existing uses requires applicants to engage with DCC as waste disposal authority, however, it is considered the SPD needs to go further to reiterate the importance of protecting the operation and, therefore, capacity of the waste facilities:</p> <ul style="list-style-type: none"> • Policy W08 – Existing uses should also include the requirement to engage with DCC as waste planning authority and list ‘all existing waste management facilities.’ Currently, the household waste recycling centre is not referenced. • Policy L18 – Noise should include ‘all existing waste management facilities.’ Currently, the energy from waste facility and the household waste recycling centre are not listed within the key external noise emitters. <p>The inclusion of development adhering to the waste hierarchy in Policy Q11 – Material and waste hierarchy is supported. Policy Q03 and Policy Q02 should be</p>	

Name	Organisation	Comment	Response
		<p>strengthened to include reference to requiring waste avoidance and minimisation, rather than just mention of waste management in Policy Q03.</p> <p>It is also recommended that the SPD requires the applicant to explore the option for utilising the heat from the energy from waste facility given the close proximity to the development and opportunity this presents. This would align with Section 4.4 of the SPD.</p>	<p>Comment noted. The introductory text on page 38 has been amended accordingly, referring to this as an example of a potential opportunity.</p>
		<p>Highways and transport</p> <p>Following early engagement in the production of the SPD, Devon County Council welcomes the overall content of the document from a highways and transport perspective. The identification of the development as a low car scheme usefully demonstrates the need for extra sustainable travel methods and funding of the Exeter LCWIP will help to shift travel movements away from the car and towards more sustainable methods. We would however like to see a commitment within the SPD to ensure that there is sign up to a car share and bike share scheme once a replacement scheme has been established.</p> <p>We would however request the following areas are addressed:</p> <ul style="list-style-type: none"> • The term “low car neighbourhood” is used throughout the document and we would ask that a definition of this term, in the context of this document, is provided within the SPD for clarification. • The wording for policy A18 – Tan Lane should be amended as follows to better prevent its use as a rat run: 	<p>Support noted.</p> <p>Comment noted. A definition of a low-car neighbourhood has been added to the Glossary. Code A18 has been amended accordingly. Code A21 requires cycle parking to be provided in line with current government best practice, with secure enclosed cycle and mobility aid parking for residents (and visitors) provided in convenient locations near the front door</p>

Name	Organisation	Comment	Response
		<p>“South of Foundry Lane, Tan Lane shall provide a route for public transport, controlled by a bus gate or cameras, through a re-opened underpass opening under the railway and an enhanced active travel route through the existing underpass.”</p> <ul style="list-style-type: none"> • Policy L21 – Storage refers to proposals exploring “...opportunities to provide dedicated secure ground floor storage for apartments in addition to the required cycle storage.” However, we cannot see where elsewhere in the document the “required cycle storage” is referred to. We would therefore request that cycle storage is appropriately addressed within the document and any reference to provision subsequently goes above and beyond the provision set out in Exeter’s Sustainable Transport SPD to more reflect the commitment to making Water Lane a car free/ low car neighbourhood. In order to address this point we would request that the Water Lane SPD requires that each dwelling shall be provided with sufficient secure cycle storage capacity to meet the needs of all the expected number of residents per dwelling. • We finally note that there is no mention of Green Travel Schemes for residents or businesses and would request that the SPD sets out the requirement for a robust travel plan to be provided as each development comes forward. 	<p>and prioritised over car parking. In accordance with the National Planning Policy Framework and the Council’s existing Sustainable Transport SPD, all developments at Water Lane that will generate significant amounts of movement will be required to provide a travel plan, and planning applications will be required to be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be addressed.</p>
		<p>Flood risk management</p> <p>It is extremely encouraging to see rain gardens and other nature-based SuDS solutions heavily referenced within Policy S06. In order to strengthen the requirement for such solutions we request that the wording is amended to read as follows: “Nature-based solutions, such as rain gardens, shall be</p>	<p>Support noted and comments noted. Code S06 has been amended accordingly.</p>

Name	Organisation	Comment	Response
		<p>used for drainage wherever possible. Green streets and green lanes are expected to accommodate a large proportion of SuDS within the street.</p> <p>Permeable paving and soft landscaping shall be used wherever possible to slow water runoff.</p> <p>SuDS must be designed in accordance with best practice guidance, be multi-functional wherever possible and avoid over-engineered solutions.”</p> <p>We would however wish to receive clarification of the following matters and how they will be addressed before the SPD is progressed:</p> <ul style="list-style-type: none"> • There is some concern regarding maintenance of SuDS and how this will be secured with multiple developers/ management companies – does the policy need to address this? • If DCC won't adopt street drainage, will ECC? • Are Exeter, as owners of the canal, content with surface water being drained from the development into it (that is the current proposal for the planning application)? • This is a dense development and whilst it is excellent that above-ground multi-functional features are being pushed, it feels as though there will need to be some medium to large storage features within the site (possibly oversized pipes or tanks beneath roads if there isn't adequate public open space to locate them) , unless each building can get rainwater harvesting tanks as well as an attenuation tank all within the roof and/or ground floor. How will this be dealt with? • Is there scope for Riverside Valley Park (adjacent to Marsh Barton Railway Station) to have a wetland area with 	<p>Comment noted. Code Q17 relates to the management and maintenance of areas and infrastructure such as SuDs and has been amended to clarify the expected approach to adoption. It requires developers to engage with DCC to establish SuDs for adoption or agree a robust alternative approach to management and maintenance. Code Q10 sets out a water hierarchy and is clear that development proposals should incorporate water storage, rainwater harvesting and use across all properties. As the Riverside Valley Park is not part of the Water Lane red line, the suggestion that the Valley Park could include a wetland area with a surface water connection from Water Lane has not been pursued. However, this is something that could be considered in the future, in consultation with South West Water.</p>

Name	Organisation	Comment	Response
		<p>the Water Lane site installing a surface water sewer down to it?</p> <p>Adult and Social Care</p> <p>We welcome Policy L19 (Accessible homes) and its aim to encourage the accommodation of changes in tenants' mobility through design in order to meet the accessible and adaptable dwellings standard. We would like to see those standards extended to as many homes as possible to support those with additional needs to live independently in the community. We would also ask that Policy L19 wording is changed to read as follows: "Wheelchair accessible housing shall be provided as part of a development housing mix to meet Building Regulations M4(3) wheelchair user dwelling standard."</p> <p>We also welcome the inclusion of Policy W06 (Housing mix) however we feel that the commitment to deliver affordable homes for eligible households with a local connection or key workers, supporting our care market to deliver vital services to the most vulnerable could be strengthened by amending the wording to read as follows: "Development must provide a mix of housing which caters for a broad demographic and takes account of local needs, including for affordable housing. This should be reflected in the type, size and tenure of housing proposed as well as its associated amenity space. This mix shall include homes suitable for families, key workers, people with additional needs, care leavers, younger people, students, elderly, downsizers, and custom build housing."</p> <p>We finally welcome the identification within the SPD and</p>	<p>Support noted. Codes L19 (now L20) and W06 have been amended accordingly.</p>

Name	Organisation	Comment	Response
		<p>Policy W06 of the need for homes for older people, including Extra Care Housing. Extra Care Housing is an excellent way to provide a supportive and secure living environment that allows a dynamic community of individuals with a range of needs to age in place and maintain their quality of life. Where Extra Care or any other accommodation for those with additional needs or the elderly is built, we are keen to see it developed within community settings and importantly with good access to public transport networks and parking to enable visitors. Our most recent Needs Assessment identifies a need for around 200 additional units of Extra Care in Exeter by 2033 and the Water Lane Reference 15 (Strategic policy) of the Exeter Plan Full Draft Local Plan allocates the Water Lane site for a 70-unit Extra Care Housing scheme as does the emerging Infrastructure Delivery Plan. Therefore, in support of this requirement we would request that the wording of the final paragraph of this policy is strengthened to read as follows: "There is a need for homes for older people, including extra care housing, in Exeter. Applicants must liaise and collaborate with relevant local authorities to explore how the development will best support this need."</p>	
		<p>General presentation of the SPD</p> <p>Overall, whilst the main content of the SPD document is clear we would like to comment on how we found it to navigate between policies and pages. We feel the contents page at the beginning of the document would benefit from including hyperlinks to each chapter and section. We also feel that the document would benefit from having Section 4.1 Code contents, currently on pages 24-26, being located</p>	<p>Comment noted. It has not been possible to add hyperlinks as suggested because this causes the SPD to fail accessibility checks for online documents. However, the Code contents section has been moved forwards in the SPD to follow the contents page and page numbers have been added.</p>

Name	Organisation	Comment	Response
		<p>directly below the Contents page on page 2 and for it to contain page numbers and hyperlinks to the appropriate policies.</p>	
-	Homes England	<p>1. Building for a Healthy Life/Garden City Principles</p> <p>We note that the principles of the Building for a Healthy Life initiative and the Garden City Principles have now been mentioned as informing the Code but there appears no mention of the government's Garden Communities programme.</p> <p>2. Homes England's five objectives set out in our latest Strategic Plan are as follows:-</p> <ul style="list-style-type: none"> • Support the creation of vibrant and successful places that people can be proud of • Housing and regeneration that works for all – driving diversification, partnership working and innovation. • Enable sustainable homes and places, maximising positive contribution and minimising environmental impact. • The creation of high quality housing and well-designed places - taking a long term approach • The creation of homes people need – right type and tenure. <p>The Design Code follows many aspects of the Plan, which we note is informed by National Planning Policy Framework, the Local Plan and the vision for Exeter set out in the Liveable Exeter initiative. In particular we note that the Code envisages a low car neighbourhood with the highest sustainability performance building standards and welcoming neighbourhoods. We also note that the Code</p>	<p>Comment noted. Page 16 of the SPD now acknowledges that the Code has been informed by the Government's Garden Communities programme.</p> <p>Support noted and comment noted. The supporting text to code W06 has been amended to note that family housing at Water Lane can be in the form of both apartments and townhouses. Code L01 has been amended to note that townhouses can form part of the mix of dwelling types in the Central and Southern zones. A new code (L21) has been added concerning the design of townhouses.</p>

Name	Organisation	Comment	Response
		<p>sets out to provide a mix of housing which caters for a broad demographic. It suggests this can be provided in apartments that are well designed rather than houses. We recognise that this is a brownfield high density area but that this type of accommodation may not fulfil all people's housing needs.</p>	
		<p>3. Other General Comments on the Design Code</p> <ul style="list-style-type: none"> • Not enough emphasis on importance of collaboration and joint working between landowners / developers in terms of design, infrastructure., connections and delivery – some guidance is in Q17 – but more needs to be made of this up front in the document and we would suggest specific requirements included such as demonstrating how adjoining proposals respect each other to deliver a coherent place. • Sustainable parking approaches could be pushed more given location of this site. Are there opportunities for car free parking? 	<p>Comment noted. The SPD has been amended to give greater emphasis to the importance of collaboration and joint working. For example, the section about collaboration (in the context of delivering a successful neighbourhood) has been moved forwards in the SPD to appear at section 2.4; and codes relating to the delivery of key infrastructure (e.g. W04 – primary school) have been amended to stress the need for collaboration to resolve delivery matters.</p> <p>Comment noted. The Council does not consider it appropriate that Water Lane should be entirely car free. For example, car access to the area will still be required to support tourism, leisure activities and the planned new primary school and to serve existing residents and businesses. The Mobility Strategy in the SPD does, however, seeks to minimise the need to travel by car to Water Lane, which will enable car parking provision to be similarly minimised. The primary mobility hub (code A09) requires provision for cycle parking and code A12 states that cycle parking must be provided in line with current Government best practice and prioritised over car parking. Code A11 sets a low average parking to dwelling ratio across the site of 1:5.</p>

Name	Organisation	Comment	Response
		<ul style="list-style-type: none"> <li data-bbox="562 272 1274 336">• Not sure if accommodating servicing of non-residential units is referenced (we may have missed it). <li data-bbox="562 703 1274 807">• Public realm – really important here – yet guide only requires a 3m setback to canal basin – is this sufficient given push on building height and density? <li data-bbox="562 847 1274 1126">• There are mixed messages about stewardship in the document with references to both public/private ad trust arrangements. The public realm will be critical to success of this development and document should make it clear what is expected in terms of joined up stewardship – in the public or trust arena. Also, it should be made clear that developers will need to develop a sustainable funding model for stewardship. <li data-bbox="562 1166 1274 1270">• Section on infrastructure, phasing, delivery could be strengthened– reference to future plans – these really need to be embedded into this document to give it teeth. <li data-bbox="562 1310 1274 1374">• It is not always clear what is mandatory and what is flexible in respect of requirements and expectations of 	<p data-bbox="1296 237 2036 660">Comment noted. Emergency service and service vehicles must be able to access Water Lane. Code A06 requires the primary mobility hub to include access for delivery and servicing vehicles and code A09 states that space for servicing (in the context of parking) can be provided within predominantly car free areas. Code A15, A19, A20, A21, A23, A25 require all main routes (Water Lane, the Neighbourhood Street, Haven Road/Maritime Court, Foundry Lane, Michael Browning Way) and Green Streets to include sufficient space to accommodate emergency and service vehicles. Code A26 requires Green Lanes to be able to accommodate emergency vehicles.</p> <p data-bbox="1296 708 2036 772">Comment noted. The Council considers that a minimum 3 metre setback is appropriate.</p> <p data-bbox="1296 852 2036 987">Comment noted. Code Q17 has been substantially amended to clarify the approach to stewardship and governance. The code specifies that a sustainable model must be agreed to ensure ongoing stewardship.</p> <p data-bbox="1296 1171 2036 1275">Comment noted. This section has been brought forwards in the SPD to give it greater prominence and the text has been strengthened.</p> <p data-bbox="1296 1315 2036 1378">Comment noted. The SPD has been amended to clarify what is mandatory (“should/must” be done) because it is a</p>

Name	Organisation	Comment	Response
		<p>developers – more clarity on this would be useful in the document to avoid ambiguity.</p> <ul style="list-style-type: none"> • Will there be a requirement for a design review process to assess emerging design concepts? • Will implementation of the document and vision be monitored? If so, how & by who? 	<p>requirement of existing planning policy and what is more flexible (“encourage/support”) because it not currently enshrined in adopted planning policy.</p> <p>Comment noted. The Council has recently adopted the Liveable Exeter Placemaking Charter, a guiding document that underscores our commitment to creating sustainable, accessible and vibrant urban spaces. The charter outlines the processes by which the Council ensure that all projects align with our vision for Liveable Exeter. This includes an expectation that developers will engage constructively with the design review process.</p> <p>Comment noted. The SPD does not refer to monitoring specifically. The Exeter Core Strategy sets monitoring indicators and development at Water Lane will be monitored against these by the City Council. The Exeter Plan will also set monitoring indicators to enable a similar a process going forwards.</p>
-	Exeter Civic Society	<p>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.</p> <p>General Points</p> <p>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</p>	<p>Support noted.</p> <p>Comment noted. The Council considers that the Development Framework and Design Code contained in the SPD, alongside emerging and existing planning policies in the Exeter Local Plan First Review, Exeter Core Strategy and Exeter Plan, will enable the delivery of high-quality development at Water Lane. The design codes contained in</p>

Name	Organisation	Comment	Response
		<p>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:</p> <p>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.</p> <p>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:</p> <p>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</p>	<p>the SPD can and will only apply to developer within the red line for Water Lane. The development framework and design codes have been informed by the context, opportunities and constraints of the wider area, including those relating to travel and movement, heritage and key views.</p>

Name	Organisation	Comment	Response
		<p>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:</p> <ul style="list-style-type: none"> •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. <p>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</p>	

Name	Organisation	Comment	Response
		<p>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:</p> <p>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:</p> <ul style="list-style-type: none"> ■ 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; 	

Name	Organisation	Comment	Response
		<ul style="list-style-type: none"> ■ the proportions of buildings framing spaces and streets; ■ the local vernacular, other architecture and architectural features that contribute to local character. <p>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.</p>	
		<p>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 northwestern 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 southeastern tip of the development</p>	<p>Comment noted. The Council is satisfied that the amended Vision encapsulates the future of Water Lane, making clear that it will be both a dense and urban neighbourhood matched by an abundance of nature within all streets and spaces.</p>

Name	Organisation	Comment	Response
		<p>(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.</p> <p>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.</p>	<p>Comment noted. Where appropriate under existing adopted planning policy, codes within the SPD have been amended to provide greater clarity and/or specification.</p>
		<p>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.</p> <p>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</p>	<p>Comment noted. Where appropriate under existing adopted planning policy, codes within the SPD have been amended to provide greater clarity and/or specification.</p> <p>Comment noted. As explained on page 20 of the SPD, the precedent images show useful examples of what can be achieved. Bullet points are generally only used where a code</p>

Name	Organisation	Comment	Response
		<p>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.</p> <p>4.1. Code contents. Not sure that this needs a separate reference number.</p> <p>4.2 Regulating Plan. Essential plan but should be part of the Framework / master plan.</p> <p>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.</p> <p>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:</p>	<p>contains a large amount of text and a list of requirements, in order to improve clarity.</p> <p>Comment noted. No change made.</p> <p>Comment noted. The regulating plan illustrates the requirements of the code in spatial form. As such, it is not part of the development framework. However, the two are closely related.</p> <p>Comment noted. Page 155 has been amended to make this clearer.</p> <p>Comments noted. Grace Roads Fields is a greenfield site in flood zone 3 and, in planning policy terms, is therefore part of the River Exe's functional floodplain. A campsite is classified in the National Planning Framework (NPPF) as a use that is 'more vulnerable' to flood risk. The NPPF is clear that such uses are not suitable in flood zone 3 and should not be</p>

Name	Organisation	Comment	Response
		<p>•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.</p> <p>•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.</p> <p>Word definitions p.30 Legible and legibility These words relates to handwriting. Spellings and word suggestions</p>	<p>granted planning consent. Therefore, it would not be appropriate for the Liveable Water Lane SPD to identify Grace Road Fields as suitable for a campsite. Grace Road Field is also within the Waste Consultation Zone of the Exeter Energy from Waste (EfW) Facility, identified in the Devon Waste Plan. It is highly likely that a campsite within the Waste Consultation Zone would be impacted by the noise, odour and dust etc. generated by the operations of the EfW and therefore this would not be a suitable use for the site. It is unlikely these impacts could be mitigated to an acceptable level. It is likely that Devon County Council, as the Waste Disposal and Waste Planning Authority, would object to such development on grounds that it would constrain the operation of the EfW Facility.</p> <p>Comment noted. Code S15 notes that uses being considered for Grace Road Fields include a canal basin/marina and that the Masterplan should be used for ideas and reference.</p> <p>Comment noted. The glossary to the SPD now includes definitions of 'legible/legibility' and 'meanwhile use'. Spelling corrections have been made and abbreviations clarified throughout the document.</p>

Name	Organisation	Comment	Response
		<p>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 I It pp.149-154 citizen's citizens'</p>	
-	Haven Banks Residents' Group	<p>Our response consists of General Points first, plus a section in Response to Specific Design Codes. As the Design Codes run to 153 pages, and due to the relatively short duration of the consultation, we have shared these Codes out amongst our group to work on, and then brought the findings back together. We have tried to resolve any contradictions, but where they remain, they reflect either the differing views of the local residents or the fact that no single person really had a deep and thorough grasp of every section. This means we may have made a point on a Design Code, which may already be addressed by another Code. We would be happy to clarify any ambiguities if you want to reach out to us. There are large parts of the document which we have not commented on as we are in broad agreement with those Codes.</p>	Comment noted.
		<p>GENERAL POINTS</p> <p>Liveable Buildings</p> <p>It is good that the proposed Design Codes ensure developments accessible by the public and is not a gated development. We agree there is a requirement for appropriate homes in the area but not 'short-term' co-</p>	Support noted and comment noted. It is important that Water Lane is developed as a long-term and stable mixed community. Code W06 requires development to provide a mix of housing that caters for a broad demographic and takes

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		<p>living, where there will likely be a transient population; there needs to be a long-term and stable mixed community. Developers need to be respectful of the city's overall character, particularly in this historic quarter. Exeter should not become a facsimile of other cities and towns in the UK that have undergone regeneration (particularly in respect of waterside areas such as Bristol, Gloucester Docks, Exmouth etc.).</p> <p>Two major issues are: the density per hectare of the proposed developments is too high; and the heights of the proposed buildings should be in keeping with (and no more than one storey higher than) adjacent existing buildings. These issues are of particular concern in respect of the proposed Water Lane site. (The height and density (m2) of proposed new housing, along with floor space and parking spaces per property, should not be left to reserved matters; these are important issues that should be agreed in the early stages of planning.)</p> <p>If floor levels are raised, the Codes must ensure flood risk upstream isn't increased, given the current flood risk in existing areas is significant. (NB: No properties in the River Meadows/Water Lane areas are occupied, due to a known surface/pluvial flood risk.)</p> <p>Environmental standards for construction should be by specification rather than by default e.g., Passivhaus; BREEAM system for sustainable homes. The design code</p>	<p>account of local needs and states that housing typologies that are dedicated to a narrow demographic, such as co-living, must not dominate the area. The 2022 Exeter Local Housing Needs Assessment identifies that co-living housing offers opportunities for groups such as recent graduates to establish themselves in Exeter as an alternative to living in HMOs. Codes including M03, M06, L06, C01 and C06, alongside heritage and design policies in the Exeter Local Plan First Review and Core Strategy and emerging policies in the Exeter Plan, will help to ensure that development is respectful of the city's character/historic character.</p> <p>Comment noted. The Council is satisfied that the SPD sets appropriate density ranges and maximum heights for development at Water Lane. Code L18 requires buildings to generally be no more than two storeys higher than existing neighbouring development and the Council considers that this is appropriate, particularly given that the code also requires development to respect the amenities of existing residents. The planning system allows matters of detail to be considered at reserved matters stage.</p> <p>Comment noted. Code Q15 (Flood Risk) states that development should be designed so as not to increase flood risk elsewhere.</p> <p>Comment noted. The SPD has been amended to clarify what is mandatory ("should/must" be done) because it is a requirement of existing planning policy and what is more</p>

Name	Organisation	Comment	Response
		needs to be enforced, and developers must maintain quality.	flexible (“encourage/support”) because it not currently enshrined in adopted planning policy.
		<p data-bbox="555 304 1285 339">Additional observations</p> <p data-bbox="555 379 1285 587">Not enough consideration appears to have been given to the requirement for daylight (although presumably, the minimum requirement for one habitable room to receive sunlight all day, is dependent upon the layout of each individual liveable unit and the number of windows it contains).</p> <p data-bbox="555 627 1285 834">Consideration should also be given to Design Codes relating to the impact on solar panels installed on existing properties affected by housing developments (currently based on BSC codes set each on the Spring Equinox). However, we are pleased to see the street ratio in terms of daylight levels; people need light.</p> <p data-bbox="555 914 1285 1058">New residential and commercial (e.g., the proposed college and retail development opposite Cotfield Street, Gabriel's Wharf and River Meadows) developments should be kept separate from existing residential properties.</p> <p data-bbox="555 1098 1285 1201">In terms of ventilation and dual aspect of the proposed buildings, we consider that outside decks must be only supplementary to open space amenity provision.</p> <p data-bbox="555 1313 1285 1380">Given the potential close proximity of external noise emitters, are the current proposals to mitigate</p>	<p data-bbox="1285 379 2040 483">Comment noted. Code L16 sets specific requirements for daylight. Daylight is also covered code L02, L13, L17, L18, L23 and Q04.</p> <p data-bbox="1285 627 2040 882">Comment noted. Code L18 has been amended to state that new development should avoid a significant impact on the energy-generating ability of existing solar panels on neighbouring properties. However, some forms of development that can cause overshadowing of solar panels can happen through permitted development, so may not require planning permission from the local authority.</p> <p data-bbox="1285 914 2040 1058">Comment noted. Policies in the Exeter Local Plan First Review and Core Strategy and emerging policies in the Exeter Plan, alongside the SPD (e.g. code L18), aim to safeguard the residential amenity of existing homes.</p> <p data-bbox="1285 1098 2040 1273">Comment noted. Code S02 states that residential development should provide a range of (communal) open space in accordance with the Fields in Trust benchmark guidelines. Outside deck space will be in addition (supplementary) to this open space.</p> <p data-bbox="1285 1313 2040 1380">Comment noted. Having taken advice from the Council’s Environmental Health Team, code Q09 of the SPD has been</p>

Name	Organisation	Comment	Response
		<p>environmental noise pollution really adequate? Mandatory installation of acoustic treatment should be considered, to ensure the maximum of 45dB(A) from adjoining apartments.</p>	<p>amended to state that development proposals should meet expected standards for all pollutants, including noise. The Team is satisfied that code L17 is appropriately worded in respect of the need to consider noise levels within new homes.</p>
		<p>Canal and Canal Basin</p> <p>The Riverside is a green lung which stretches from Exeter's outskirts to the Canal Basin, the Riverside Quay and the edge of the City's centre. It provides a welcome, traffic free, quiet space for relaxation and exercise and it is vital that this wonderful facility is protected and enhanced. It is important that this space should not be overshadowed by a large development. Specifically, we do not agree that a reduced set back from the canal is acceptable; two people should be able to comfortably pass each other. It should be codified that developments must be at least eight metres away from the canal rather than just three metres, in line with main river allowance.</p> <p>There appears to be no mention of the maximum height of the buildings in this area. We should like to see a maximum of four storeys; although, considering the importance of sunlight in terms of existing residential properties (not just the proposed newbuilds), it makes sense that the heights of the newbuild properties should be no more than those of the existing neighbouring developments (unlike the no more than two stories higher than adjacent buildings specified). Importantly, in this regard, it should be noted that shading of Exeter Canal by five- or six-storey buildings will put the canal in shadow for much of the day which, as well as impacting users (e.g., walkers, kayakers and</p>	<p>Comment noted. The Council considers that a minimum 3 metre setback is appropriate at the Canal basin and will allow for widened public access.</p> <p>Comment noted. Code L03 and the accompanying plan show maximum building heights for different areas of Water Lane, including the Canal and Canal Basin, stating that alternative arrangements (as defined on the plan and legend) will only be acceptable based on robust justification. In such cases, the buildings must be of exceptional quality. For the Canal Basin zone, four storeys is identified as the maximum height subject to the above caveats. Code L18 require buildings to generally be no more than two storeys higher than existing neighbouring development and the Council considers that this is appropriate, particularly given that the code also</p>

Name	Organisation	Comment	Response
		<p>rowers), has the potential to create a detrimental impact on its ecology.</p>	<p>requires development to respect the amenities of existing residents.</p>
		<p>Central Zone</p> <p>There needs to be a specified set back e.g., from canal (see under Canal Basin).</p>	<p>Comment noted. The Central Zone is not adjacent to the Canal, therefore a setback measurement is not necessary.</p>
		<p>Active Streets</p> <p>Although the Design Codes' approach to access and egress appears reasonable, the overall Mobility Strategy is not feasible in the short or medium term: additional access/egress is required (not just the Haven Road/Alphington Road junction) and should be approved prior to the planning consent. Haven Road must not be a primary route, as multiple leisure and hospitality venues will result in pedestrian crossings. We are also concerned about the impact on traffic flows at the Alphington Road/Haven Road junction - especially regarding access to businesses, and access by emergency vehicles. Importantly, the plan must consider how visitors who have to rely on cars (for whatever reason) will get to and park at the new developments, the area's existing facilities, and one of Exeter's major tourist attractions – the historic Quay. (The plans themselves do not clearly differentiate between primary and secondary routes; both appear in the same colour).</p> <p>The minimising and consolidation of car parking required by developers to use as a tool 'to enable higher densities', will be detrimental to residents of existing properties in the area (which currently operates a paid Residents' Parking system due to already being a recognised problem area).</p>	<p>Comment noted. Water Lane is to be redeveloped as a low-car neighbourhood, in part to avoid unacceptable impacts upon the Alphington Road junction. The restrictions on general road access described by the SPD accord with this Vision and are supported by Devon County Council as local highways authority. Haven Road (from its junction with Water Lane) will not be a primary route – in accordance with DCC's LCWIP, code A03 notes Haven Road is not suitable for general vehicle access for new development. Car access to the area will still be required to support tourism, leisure activities and the planned new primary school and to serve existing residents and businesses etc. The SPD's Mobility Strategy does, however, seek to minimise the need to travel by car to Water Lane, which will enable car parking provision to be similarly minimised.</p> <p>Comment noted. Code A11 has been amended to state that parking and access rights for existing residents and landowners will be safeguarded.</p>

Name	Organisation	Comment	Response
		<p>Existing residents must be given assurances that they will continue to be able to park in the current parking zones, and that the DCC parking controls need to continue to be carried out in both existing and new Residents' Parking areas.</p> <p>Given the demise of Co-car, a new car club provider needs to be found, and guaranteed.</p> <p>How will the strategy cope with electric cars?</p> <p>LTN (Local Transport Note) 1/20, the government's definitive national standard for cycling infrastructure design in the UK, must be mandated and enforced. Cycle infrastructure must be built in tandem with development phases; current infrastructure cannot cope. We are pleased to see that adequate storage appears to have been considered for bikes and kayaks etc. however, bike lockers are needed for existing streets. It should be noted that any cycle storage provision needs to be adequate for e-bikes, cargo bikes, and child carriers, and include electric charging points.</p> <p>The compulsory purchase of large areas of land (e.g., Water Lane) means that roads can be moved. Therefore, the location of the main 'through route road' should be changed from the canal side to the railway side, and another route into Marsh Barton considered. It is best practice for major roads to be kept away from residential zones.</p>	<p>Comment noted. The Council will continue to work to secure active travel providers for Water Lane and the wider city.</p> <p>Comment noted. Code Q07 requires development to explore proposals to include electric charging infrastructure for vehicles. Codes A09 and A10 require the primary and secondary mobility hubs to include EV charging.</p> <p>Support noted and comment noted. LTN 1/20 will be followed at Water Lane (e.g. see codes A02, A05, A07 and A21). Code A90 requires the primary mobility hub to include secure cycle parking and code A12 states that proposals should explore opportunities to provide secure cycle parking for existing residential areas. Code A09 has been amended to refer to child carriers and charging points.</p> <p>Comment noted. Water Lane is proposed as a low-car neighbourhood and there will be no 'major roads' running through it.</p>

Name	Organisation	Comment	Response
		<p>Spaces for People and Wildlife</p> <p>ECC must ensure a biodiversity 'net gain' on all planning applications, and ensure it is delivered. A green corridor should be created along the canal to protect biodiversity and net gain, providing a continuous protected green lung into the centre of the city. Furthermore, for the health and wellbeing of each and every existing and potential resident of the area, all trees must be retained – with none being cut down; work should be carried out to ascertain the ratio of trees to people.</p>	<p>Comment noted. The Council will apply the planning policy on biodiversity net gain in accordance with National Planning Policy Framework and emerging Exeter Plan requirements. Code S04 requires all development proposals where relevant to preserve, restore and create wildlife habitats, corridors and networks (etc.) and this will include along the Canal. Code S07 is clear that existing trees should generally be retained and any removal (for example, because they are dead, dying or diseased) must be clearly justified and compensated for by the planting of new trees. Code S05 encourages developers to achieve specific Urban Greening Factor scores, which could be met at least in part through the planting of new trees accompanied by an operation and management plan to ensure their long-term health.</p>
		<p>Additional observations</p> <p>There is a need to consider people's abilities (e.g., disability and age).</p> <p>CIL/Section 106 funds need to be spent in the local area for the benefit of the local community.</p>	<p>Comment noted. This is very important and is considered in a number of codes. A non-exhaustive list includes: code W06 on housing mix, which requires developers to explore how to deliver housing for older people; code L20 which encourages development to include accessible and adaptable dwellings and requires it to include wheelchair accessible housing; code A05 which, as part of the general requirements for the design of streets and junctions, requires that proposals adopt an inclusive approach which considers the needs of vulnerable users from the outset; and code A10 which requires secondary mobility hubs to be accessible for those with disabilities. Code A09 on the primary mobility hub has been amended to do likewise.</p> <p>Comment noted. The tests for S106 Agreements set by planning legislation are that they be necessary to make a</p>

Name	Organisation	Comment	Response
		<p data-bbox="562 596 1039 624">Heat and Power: Connect to incinerator.</p> <p data-bbox="562 740 1240 804">Infrastructure needs to be delivered in advance; can it be proved that sewers can cope?</p>	<p data-bbox="1296 237 2033 588">development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. The consequence of these tests is that financial contributions secured in a S106 Agreement are generally spent in the local area of the development. Money collected through the Community Infrastructure Levy is used to help provide a wide range of infrastructure needed as a result of new development. Around 15 % of the Council's CIL receipts are spent on neighbourhood projects via the Exeter City Fund.</p> <p data-bbox="1296 632 2033 732">Comment noted. The SPD has been amended to highlight the opportunity for local energy networks to be created, with the EfW facility being a potential source of energy.</p> <p data-bbox="1296 775 2033 978">Comment noted. Section 2.4 has been amended to stress the importance of infrastructure phasing. The Council will continue to work with South West Water to ensure that the sewage system is able to accommodate development at Water Lane. Additional text has been added to page 47 setting out the sewage infrastructure improvements needed.</p>
-	Local residents from the Haven Banks area	Need to consider people's abilities (e.g., disability and age).	Agree, this is considered in a number of codes. A non-exhaustive list includes: code W06 on housing mix, which requires developers to explore how to deliver housing for older people; code L20 which encourages development to include accessible and adaptable dwellings and requires it to include wheelchair accessible housing; code A05 which, as part of the general requirements for the design of streets and junctions, requires that proposals adopt an inclusive approach which considers the needs of vulnerable users from the outset; and code A10 which requires secondary mobility

Name	Organisation	Comment	Response
			hubs to be accessible for those with disabilities. Code A09 on the primary mobility hub has been amended to do likewise.
		CIL / Section 106 funds need to be spent in the local area for the benefit of the local community.	Comment noted. Under planning legislation, Section 106 Agreements must be necessary to make a development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. Consequently financial contributions secured in a S106 Agreement are generally spent in the area local to the development. Money collected through the Community Infrastructure Levy is used to help provide a wide range of infrastructure needed as a result of new development. Around 15% of the Council's CIL receipts are spent on neighbourhood projects via the Exeter City Fund.
		Heat & Power: Connect to incinerator	Comment noted. The SPD has been amended to highlight the opportunity for local energy networks to be created, with the EfW facility being a potential source of energy alongside other sources.
-	-	Cycle paths must always be segregated from walkways, as to do otherwise is unsafe for partially sighted/blind people.	Comment noted. Code A02 has been amended to clarify that segregation of users will be sought in accordance with Local Transport Note 1/20 and where space in the carriageway allows.
		Kerbs must be designed to be safe for partially sighted/blind people.	Comment noted. Code A05 (general requirements for design of streets and junctions) requires proposals to adopt an inclusive approach that considers the needs of vulnerable users from the outset, ensuring that everyone regardless of age and ability can easily get around.
		Talking bus stops should be considered, to assist partially sighted/blind people.	Comment noted. Code A05 has been amended to stipulate that bus stops must be inclusive.
		Taxis must be able to get through bus gates to ensure that partially sighted/blind people are not disadvantaged.	Comment noted. The SPD does not code for the design/operation of bus gates.

Name	Organisation	Comment	Response
		<p>Affordable homes must be included in all development at Water Lane. This is vital for young people and people with disabilities, who often have low incomes.</p>	<p>Comment noted. The Council already has a planning policy which seeks 35% affordable housing from developments of 10 or more homes, contained in the Exeter Core Strategy. This will continue to be applied, until it is replaced by a similar policy in the new Exeter Plan. Code W06 requires development at Water Lane to provide a mix of housing which caters for a broad demographic and takes account of local needs, including for affordable housing. The mix should include homes suitable for young people. Code L19 sets out accessibility standards for new homes at Water Lane, which applicants will be encouraged to meet, and requires wheelchair accessible homes to be provided as part of the housing mix.</p>
-	-	<p>Strategic overview/ General points</p> <ol style="list-style-type: none"> 1. There is much to welcome in the document, thank you for your work on this. This response focuses on areas that can be enhanced or improved in the policy. 2. The SPD for the redevelopment of this site is welcome and the goal a good starting point. However, <ul style="list-style-type: none"> o The goal should begin with a strong statement of commitment to addressing the climate emergency, the requirement to be a net zero carbon development and its implications for adaptation and resilience over the long term. This commitment is missing from the 2040 vision. o The goal makes no references to and recognises the value of the site's place and role in relation to the wider city and its social and community value. 3. 2040 Vision Please refer back to our previous submission 	<p>Support noted.</p> <p>Support noted and comment noted. Codes within section 4.2 of the SPD specifically seek to ensure that that development at Water Lane focuses on Net Zero and climate resilience. The amended Vision talks about Water Lane being a cherished destination 'for everyone in Exeter' and reflects the site's importance in terms of culture/heritage, nature and connections to the rest of the city.</p>

Name	Organisation	Comment	Response
		<p>on the local plan draft for our comments on the Vision, which remain unchanged.</p> <p>4. Community Engagement:</p> <ul style="list-style-type: none"> ○ With regards to the early community engagement, there was little area-wide advertising of the citizens panel with a number of participants drawn by sortition to augment the community stakeholders. Nor any publicity about this process. ○ Local ward councillors were not given a briefing on this process and there was only one opportunity for local ward members to formally contribute to the process or be aware of the timetable other than through the public engagement processes. ○ The Civic Society, resident group and community stakeholder groups should be commended for their efforts to encourage and facilitate community engagement and careful consideration should be given to their responses and the Water Lane Prospectus . 	<p>Comment noted. It is not the SPD's role to alter the 2040 Vision. For continuity, it is important that the principles and requirements of the SPD reflect the 2040 Vision.</p> <p>Comment noted. Early community engagement is not a statutory requirement when preparing SPD, but the Council considered early engagement to be important for the Water Lane SPD given its urban and site-specific nature. The early engagement process resulted in the involvement of a good number of local residents, community organisations and businesses via three Citizens' Panel workshops and a drop-in session. Members were briefed on the SPD at a Member workshop and separate Planning Member Working Groups in June and September 2023 and June 2024. The Civic Society's (etc.) input was very much appreciated and has been taken into account in the final SPD.</p>
		<p>2.2 Water Lane placemaking principles</p> <p>1. "Memorable places - A true waterside community The Canal and River define the cultural identity of, and life in, Water Lane."</p> <ul style="list-style-type: none"> ○ The Canal and River need to be considered and acknowledged for their place in the wider green space setting. That is what makes them special. The green spaces deserve recognition in their own right; the land was formerly farmland, and a large portion were orchards. The Heritage Harbour and historic Canal - both their history and their role as working infrastructure need proper recognition. 	<p>Comment noted. The Canal, River and green spaces within and adjoining Water Lane are among the many factors that shape the area's character. Code M01 requires applicants to demonstrate a comprehensive analysis and understanding of the local and city-wide context to development, and how this has shaped their proposals. The River and Canal and Riverside Valley Park are specifically mentioned as requiring consideration in this analysis. The amended Vision and page 19 of the SPD (which sets out Water Lane's development opportunities) have been amended to refer to the Canal Basin's Heritage Harbour status.</p>

Name	Organisation	Comment	Response
		<p>2. "Outstanding Quality - Exeter's flagship development Water Lane is an award-winning development known nationwide as an exemplar outstanding quality, low carbon neighbourhood."</p> <ul style="list-style-type: none"> o Needs to be net zero by 2050* if not 2030 (*to meet the requirements of the Act). "Low carbon" is not defined, nor sufficient. o The coordination of plans and phasing with other proposals must ensure that developers are expected and do contribute to the core infrastructure required for the development in a timely and sufficient manner, before or as the residential elements are built. <p>3. "Welcoming Neighbourhoods - A new exciting neighbourhood People living in Water Lane are personally invested in the community and feel a strong sense of belonging."</p> <ul style="list-style-type: none"> o Needs to include community ownership and assets otherwise its harder to achieve this. Some references are made to this in the SPD, which is welcome and should be strengthened. o The proportion of types of properties which encourage more transient living should be kept to a minimum in order to create this strong sense of belonging. St David's ward has a high turn-over of population already so the housing options should enable affordable long-term living. 	<p>Comment noted. Code Q02 is clear that development proposals should support Exeter's ambition to be net zero by 2030. It is not the SPD's role to define low carbon.</p> <p>Comment noted. Section 2.4 has been amended to stress the importance of infrastructure phasing.</p> <p>Comment noted. Code Q17 has been amended to clarify the approach to managing and maintaining areas and infrastructure at Water Lane if these are not adopted.</p> <p>Comment noted. It is important that Water Lane is developed as a long-term and stable mixed community. Code W06 requires development to provide a mix of housing that caters for a broad demographic and takes account of local needs and states that housing typologies that are dedicated to a narrow demographic, such as co-living, must not dominate the area. The 2022 Exeter Local Housing Needs Assessment identifies that co-living housing offers opportunities for groups such as recent graduates to establish</p>

Name	Organisation	Comment	Response
		<p>4. "Liveable Buildings - Responsive density and height Compact development and taller buildings are provided in the right places and in a way that is responsive to context and local heritage."</p> <p>o What does responsive mean? The density levels means that most of the SPD area will be tall buildings. This terminology should be more specific.</p> <p>5. "Active Streets - A low car and healthy neighbourhood it's easy to move around on foot, by bike and by public transport within Water Lane and to get to the rest of the City."</p> <p>o It would be good to start with a strong statement about what active streets are for, people of all abilities and their relationship to the wider community.</p> <p>o The statement should set out the transport hierarchy in a positive way.</p> <p>6. "Spaces for people and wildlife - Connecting with the Canal, River and Valley Park Abundant planting in streets and spaces together with green walls and roofs create a rich and joined up natural network."</p>	<p>themselves in Exeter as an alternative to living in HMOs. Codes including M03, M06, L06, C01 and C06, alongside heritage and design policies in the Exeter Local Plan First Review and Core Strategy and emerging policies in the Exeter Plan, will help to ensure that development is respectful of the city's character/historic character.</p> <p>Comment noted. "Responsive" may be interpreted as "considerate of", or "sympathetic to". Code L03 and the accompanying plan show 'maximum' building heights of up to 4, 5, or 6 storeys for the entire site, stating that alternative arrangements (as defined on the plan and legend) will only be acceptable based on robust justification. In such cases, the buildings must be of exceptional quality and must be responsive to (i.e., must be considerate of /sympathetic to) context and local heritage.</p> <p>Comment noted. The introductory text to this section of the SPD has been amended to provide this statement. Code A01, which sets out the mobility hierarchy) is considered to be supportively worded.</p> <p>Comment noted. "Spaces for People and Nature" are not an afterthought, but one of the seven Liveable Exeter principles that will drive all development, including at Water Lane. The codes within the SPD will help to ensure that development at</p>

Name	Organisation	Comment	Response
		<p>o 'Spaces' for nature sounds like an afterthought - and an add on rather than green infrastructure playing an important role for nature, wellbeing and addressing the climate and nature crisis.</p> <p>o 'Spaces' for people - is this meant to be in relation to nature? It doesn't sell a compelling vision for the role of people in the neighbourhood or the place we want people to call home.</p> <p>o The regulating plan should set out the green infrastructure plan.</p> <p>7. "Connected Culture - A dynamic maker community Water Lane provides opportunities for cultural attractions and creativity, building on the diverse community of businesses, and industrial heritage."</p> <p>o This is good and could be strengthened by the inclusion of social and community ownership and enterprise.</p> <p>8. "The City-wide ambition: 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"</p> <p>This site is one which is visible from many areas of the city including the surrounding hills. Insufficient consideration has been given to the views from the surrounding hills - e.g., Alphington, and the impact that this high-rise development will have on its immediate and distant context. Very tall buildings could overly dominate the valley parks and have a very detrimental effect on views of and along Exeter's iconic river and canalside.</p>	<p>Water Lane includes urban and natural greenspaces that are attractive and well-connected and well used for recreation, active travel and for supporting wildlife. The regulating plan shows key spaces for people and wildlife.</p> <p>Comment noted. Social and community ownership/management of cultural attractions (etc) would be allowed for under code Q17 (which e.g., refers to local government and maintenance of spaces and infrastructure, such as via a Community Interest Company).</p> <p>Comment noted. Code M05, as amended, requires all development proposals to map and analyse views to and from the site and consider how to best retain existing and create new glimpsed views. It requires development to retain and consider the key views shown on the accompanying Views Framework Plan, but notes that there may be others to consider and that these should be agreed with the Council at an early stage, informed by a Landscape and Visual Impact Assessment.</p>
		<p>There needs to be a policy in relation to community development and community ownership of assets. This is</p>	<p>Comment noted. Community ownership/management of areas/infrastructure/buildings would be allowed for under</p>

Name	Organisation	Comment	Response
		<p>casually mentioned but in order for that to be achieved then needs to be years' worth of work to develop that and if it will need to be going into building an organisation capable of taking on a new building and meeting such a need. If this is to happen, it might be appropriate for it to happen nearby, not actually on site, for example at the customs house. So, these suggestions need to be for thought through otherwise opportunities will be lost.</p> <p>The views of St Leonards church are mentioned. However, there are no references made to the views across to Haldon Hills from Colleton Crescent and also views from outside the city to this area, particularly from the perspective of Alphington or the conservation areas.</p> <p>Page 6 says that the regeneration should aim to connect to a heat supply from the Marsh Barton energy from waste facility. Properties should be built to a Passivhaus or BREEAM Excellent standard requiring little external heat input. Any energy supply from the Marsh Barton incinerator should be for hot water heating only. Reliance on both water and heating from one supply from the incinerator is too great a risk for communities and the experience from Cranbrook has been poor. The incinerator does not operate 365 days a year and will increasingly close on a high number of days each year in order to be repaired etc. And there is no provision for alternative supply should</p>	<p>code Q17 (which e.g., refers to local government and maintenance of spaces and infrastructure, such as via a Community Interest Company).</p> <p>Comment noted. Code M05, as amended, requires all development proposals to map and analyse views to and from the site and consider how to best retain existing and create new glimpsed views. It requires development to retain and consider the key views shown on the accompanying Views Framework Plan, but notes that there may be others to consider and that these should be agreed with the Council at an early stage, informed by a Landscape and Visual Impact Assessment.</p> <p>Comment noted. The text on page 11 (previously page 6) is a quotation from the Exeter Core Strategy. A local energy network sourced from the EfW is one option that could help to deliver net zero development at Water Lane. However, there may now be other options. The SPD must amplify adopted planning policy in the Exeter Local Plan First Review and Exeter Core Strategy and also cannot set requirements for building standards that exceed those set by the Government. Within these constraints, the codes in section 4.2 of the SPD seek to ensure that development minimises energy use and carbon emissions. The SPD seeks to ensure that development at Water Lane meets the Council's net zero ambitions.</p>

Name	Organisation	Comment	Response
		<p>there be a breakdown. District heating from the incinerator is not a long-term sustainable solution.</p> <p>The principle around spaces for people in wildlife seems to consider wildlife and nature as an afterthought. There needs to be a really strong green infrastructure framework which is set out specifically within the document. The design code is really weak on this. The abundant planting in streets and spaces to create a joint up natural network doesn't place enough emphasis on what the natural network will do and what standard it is expected to achieve. So, it should be a natural network which provides a strong green infrastructure and connects well to the neighbouring areas, including the Valley Park Canal and the river in order to provide dense opportunities for nature to thrive.</p> <p>There is very little talking about how the new community will relate to its neighbours, be their opposite or adjacent in the Haven Banks area, and of course to the new development in Marsh Barton and Alphington.</p> <p>In regard to the built form or zones, the Canal basin doesn't highlight the Heritage Harbour status of the area which is the significant oversight.</p> <p>The existing solar farm should be used to have ground source heat pumps installed underneath it to make better use of the land use.</p>	<p>Comment noted. "Spaces for People and Nature" are not an afterthought, but one of the seven Liveable Exeter principles that will drive all development, including at Water Lane. Code S01 provides a clear green infrastructure plan for Water Lane. Code A02 is clear that open space must be integrated into the wider green/blue infrastructure network. Code S03 requires all development proposals to include a GI plan setting out how development will link to existing green infrastructure and contribute to the delivery of Exeter's Green Infrastructure Strategy.</p> <p>Comment noted. Water Lane will be a new neighbourhood and development will largely provide for the needs of that neighbourhood rather than the wider area. This is reflected in the SPD. However, the document does also talk Water Lane in its wider context – for example, in terms of active travel connections to the wider area (codes A27-A30).</p> <p>Comment noted. The Vision and page 19 of the document (which sets out Water Lane's development opportunities have been amended to refer to the Canal Basin's Heritage Harbour status.</p> <p>Comment noted. This type of proposal could accord with the Council's net zero vision and would be assessed against adopted planning policies.</p>

Name	Organisation	Comment	Response
		<p>The infrastructure delivery plan as it stands is not sufficient to cover the proposed infrastructure necessary to deliver this SPD it needs its own dedicated infrastructure delivery plan including staging and this should be appended to the SPD and updated on an annual basis. The SPD should include elements of community engagement setup, opportunities for community ownership of new organisations to help with running and delivering the infrastructure and community ownership.</p>	<p>Comment noted. The SPD is only able to identify the infrastructure required under existing adopted planning policy for the Water Lane area – i.e. the Exeter Local Plan First Review and Exeter Core Strategy. An Infrastructure Delivery Plan is being prepared for the new Exeter Plan and this will include an itemised and costed list of the infrastructure required to support the redevelopment at Water Lane. Community ownership/management of areas/infrastructure/buildings would be allowed for under code Q17 (which e.g., refers to local government and maintenance of spaces and infrastructure, such as via a Community Interest Company).</p>
-	NHS Local Planning Authority Engagement	<p>Purpose The NHS LPAE team have reviewed this proposed SPD from a healthcare perspective (primary, secondary, and community) and the following provides an overview of the extracted key points for NHS Devon ICB and RDUH to comment and/or to consider a response/next steps to this consultation.</p> <p>Appendices-5 Engagement summary Extract "Key institutions including Exeter College, University of Exeter and the RDUH Hospital" There was no specific mention of the engagements that have taken place with primary care (GP services). Should NHS Devon ICB be added to the key institutions.</p>	<p>Comment noted. NHS Devon ICB was not engaged during early work on the SPD, but was consulted during the statutory consultation phase.</p>
-	Sport England	<p>Sport England support the principles within the document and its reference to Active Design. We have made some key suggestions below which would make the draft guidance more effective in delivering the NPPF objective of</p>	<p>Support noted. So that Active Design is considered in all planning applications, reference to the Active Design Principles will be added to the appropriate policy in the emerging Exeter Plan.</p>

Name	Organisation	Comment	Response
		<p>promoting healthy communities through good design. The Council may consider that all applications for Water Lane must go through the “Active Design Checklist” that has been prepared alongside the Active Design guidance. The checklist can be used to assess whether applications have included an appropriate level of detail against each of the Active Design principles.</p>	
-	<p>McMurdo Land Planning and Development Ltd (MLPD) 24001 On Behalf of McMurdo Client Group</p>	<p>Whilst our client group fully supports many elements of the SPD, whether it makes it into policy leading to delivery of much needed development or not, the difficulties faced by the City are as conveyed in our representations to the emerging Local Plan, because the context is as follows.</p> <ol style="list-style-type: none"> 1. The Local Plan and its policies are “out of date”. The SPD is too little too late in this plan period and can be “hung” from out of date and emerging policy only because the current higher tier policies have failed. The shortfall/undersupply of housing land in Exeter city has been caused by the longstanding failure of the Council to apply the current local policies holistically and correctly, releasing land sequentially under AP2 and H1. 2. Under scrutiny, the Council’s Annual Monitoring Report (AMR) shows that on an annualised need of 600 dwellings per annum (so 600 dwellings per annum in a 20-year plan period means that ECC must deliver at least 12,000 houses in the 20-year plan period ending in 2026), ECC acknowledges that it has underdelivered by more than 2,500 houses to date (pro rata). C1,500 houses delivered over considerable time on a brownfield site will not touch the sides of such a shortfall. 	<p>Support noted and comments noted. The majority of comments made are strategic and relate to the Exeter Plan, rather than to the SPD. The respondent has made similar comments in response to the Full Draft Exeter Plan consultation. The Council will respond to these comments in the Full Draft Exeter Consultation Statement in due course.</p> <p>As regards the SPD, Water Lane is a longstanding site allocation and it is appropriate that the Council should prepare and SPD to guide it’s high-quality redevelopment. The SPD aligns with policies KP6 of the Exeter Local Plan First Review and CP17 of the Core Strategy and national planning policy. Development at Water Lane will contribute towards meeting the City Council’s current housing requirement, currently of 642 homes per year. In accordance with current adopted policy and in line with national planning policy, the Council will seek 35% affordable housing on all housing developments of 10 or more homes at Water Lane, subject to viability. The Water Lane site allocation proposed in the emerging Exeter Plan requires existing levels of employment floorspace to be provided on the site. The Council is currently able to demonstrate a housing land supply equating to just under Viability evidence to support site allocations in the new Exeter Plan is being prepared, including Water Lane. Developer/landowner interest in bringing land at</p>

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		<p>3. ECC has delivered less than 25% of total housing as affordable housing meaning significantly less than 20% as a total expected and required in the plan period. (Set against a 35% policy requirement). In other words, 2,500 houses shy in the plan period has “cost” Exeter C 800 affordable dwellings in the plan period, in a city where the house price to earnings ratio is one of the worst in England (and getting worse). Planning policies (including this SPD) must prioritise securing appropriate, viable levels of affordable housing within the plan period. The catch all viability phrasing in the SPD shows that the Council is not prioritising the delivery of affordable housing.</p> <p>4. The Council cannot demonstrate a 5-year housing land supply and does not have enough employment land. The SPD does not address these issues whether it becomes policy or not.</p> <p>5. And the Council is failing in its Duty to Cooperate with other Councils. The SPD does not address this issue whether it becomes policy or not.</p> <p>Exeter City Council – Employment Land Authority Monitoring Report Authority Monitoring Report (exeter.gov.uk)</p> <p>6. At 5.7 Employment 5.7.1 of the above-named report, we can see that Exeter’s existing employment land supply is currently being reviewed. The total area of employment land is around 350 hectares and the majority, in the region of 315 hectares, falls within the classification of established employment areas. Of the remainder, around 15 hectares</p>	<p>Water Lane forwards for development is now being shown. This in itself indicates that Water Lane is a viable development prospect.</p>

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		<p>are located within other existing employment areas, around 7 hectares consists of undeveloped allocation land, and approximately 5 hectares of land contains sites with planning permission for planning use classes B1, B2 and B8.</p> <p>Exeter Employment Study 2022 Demand and Supply</p> <p>7. At xvi. in the above-named document, we can see that there is insufficient employment land currently available within Exeter to accommodate the forecast demand for up to 83 Ha over the Local Plan period and at xvii. we can see that within the first five years of the plan period, there is insufficient land to meet the demand for industrial sites.</p> <p>8. At xviii we can read that the employment strategy “recommendations emerging from the report are:</p> <ul style="list-style-type: none"> • Where appropriate, existing, and established employment sites should be retained for employment use. If premises are no longer fit-for-purpose, then redevelopment of employment premises on site should be encouraged. • Sites and premises outside of the established employment areas that are no longer suitable for employment use can be considered for change-of use. • Where appropriate, sites with planning permission and allocations for future employment development should be protected for employment use.” <p>Greater Exeter Economic Development Needs Assessment – East Devon District Council (EDDC)’s Response to Exeter’s Employment Land Need and the Exeter Employment Study</p>	

Name	Organisation	Comment	Response
		<p>9. EDDC says: “The City of Exeter is the main office location in Greater Exeter. However, it has insufficient employment land to meet its forecast demand for both offices and industrial development between 2020 and 2040. Delivery should be encouraged on all currently identified sites and conversion of redundant retail units should be considered. There is limited scope for more employment land in the city, above that already identified, so some of the demand for employment land stimulated by the city’s economy will need to be accommodated in its hinterland, in adjoining local authority areas. The Liveable Exeter initiative sets out proposals to replace some industrial sites with mixed-use development, including residential as well as employment space. This, along with the lack of potential employment sites emphasises the need to accommodate new employment development in its hinterland.”</p> <p>10. And at 3.3: “The Exeter Plan is being developed at a similar timescale to our Local Plan and a number of Policies were consulted upon... In response to the Exeter Policy EJ2: Retention of employment land, this Council suggested that the policy was not sufficiently robust in protecting jobs and employment sites, especially where existing employment sites are to be allocated for housing and mixed-use development. Some existing employment sites are allocated for housing and mixed-use development under Policy H2 allowing the loss of employment land to some, or perhaps substantial levels, of non-job uses without clearly referencing where or how commensurate new job provision, especially of the job types that might be lost, will be accommodated. To illustrate this with just one (big)</p>	

Name	Organisation	Comment	Response
		<p>example, Marsh Barton supports a significant number of businesses and jobs and many of these are of a nature that do not typically sit comfortably alongside residential uses. So, it would be difficult to integrate some existing businesses and job types into redevelopment schemes.”</p> <p>11. And at 3.4: “There are clear cross-boundary issues arising from the Exeter Plan proposals, noting two in particular: 1. Employment sites in Exeter provide jobs for people that commute from outside of the city into the city for work purposes; and 2. If jobs and business premises are lost as a result of development under Policy H2 then we would expect to see the need for relocations and allied to this provision of additional land to accommodate any net new jobs.”</p> <p>12. And at 3.5: “In EDDC’s response to the Exeter Plan, it was recommended that the City Council should undertake more detailed assessment of the implications of the proposed housing sites in the plan in respect of impacts on employment. The main evidence supporting the employment proposals of the Exeter Plan is the Exeter Employment Study acknowledges that there is insufficient employment land supply in Exeter to meet the city’s current and future demand (a deficit of up to 71 hectares of land based on accommodating a forecast of up to 21,000 new jobs to 2040). The employment study suggests that once sites in East Devon (and Teignbridge) are factored into the supply forecast, Exeter’s demand can be accommodated. Not only have sites beyond the city boundary not been discussed with the local authorities but the Exeter Employment Study does not appear to factor</p>	

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		<p>into its analysis the demands on East Devon sites that may be generated from East Devon generated growth and development. In particular we would highlight potential East Devon specific trajectories for employment growth and the demands that these may place on employment land. It is essential that potential double counting is avoided – sites in the West End of the District cannot simultaneously meet both Exeter’s and East Devon’s future strategic requirements.”</p> <p>13. Despite all of this clear evidence showing existing and future shortfalls in housing and employment land, ECC’s present position on policy making appears to be that it has decided to try to meet its own housing and employment land needs on brownfield land in its jurisdiction without reliance on other Councils. Whilst our client group would like to support the Council in its aim, unfortunately, they do not believe that this is close to being achievable, or deliverable. The Local Plan with no viability evidence to guide it, proposes to deliver 85% of its needs on brownfield land on sites such as Water Lane. The SPD for Water Lane has no viability evidence to guide it.</p> <p>14. ECC recognises that there are many brownfield sites being carried over from the existing Core Strategy (and previous Local Plan) like Water Lane which have not been delivered. Regrettably, this raises further concerns regarding the deliverability of brownfield sites like Water Lane with or without a SPD. Whilst there are obvious implications for the compatibility of uses, (i.e., industrial vs. residential) in terms of, for example, amenity impacts affecting the future of existing businesses, there is no clear</p>	

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		<p>strategy for viably, implementing mixed use in existing “heavy” employment areas such as Water Lane, including no clear strategy in the SPD. Looking at how long it has taken to even get Water Lane to a SPD stage, it is short odds on that there would be very lengthy lead in times to assemble, clear, and remediate brownfield land for residential led mixed use developments. Assembling such land for redevelopment involves, as a minimum, successful negotiations with owners, head lessees, sub lessees, planning permission, legal agreements, geo technical work, site clearance and a thorough understanding of the uses near the site that is earmarked for mixed use development.</p> <p>15. Whilst brownfield redevelopment is a cornerstone of sustainable development and is an admirable aim that our client group fully supports, viably delivering the vast majority of housing (including affordable housing; please see above) and employment numbers required in the plan period largely on brownfield land in a city where employment land values are already close to residential land values, would stifle development, and worsen the documented (including in Council papers) undersupply of housing and employment land in the city and sub region. It is reasonable to conclude therefore that greenfield land will need to be released in the city and in adjacent Council areas to help meet Exeter’s housing and employment land needs.</p> <p>Conclusion</p> <p>Our client group fully supports many of the laudable aims of the SPD. But whether it makes it into policy leading to</p>	

Name	Organisation	Comment	Response
		<p>delivery or not, the difficulties faced by the City are as conveyed in their previous representations to the emerging Local Plan, which they will reiterate in their next consultation responses.</p> <p>We thank you for the opportunity to comment and you will see that we have copied EDDC to be open and transparent because some of what we say herein relates to policy making at that Council.</p>	
-	Exe Water Sports Association (EWSA)	<p>I am writing on behalf of Exe Water Sports Association (EWSA) which occupies a large complex of premises and land along Haven Road. We note in your 'Liveable Water Lane Planning Consultation' there is no mention of the water borne activities that take place on the canal and River Exe in your proposal, unless we have missed something.</p> <p>EWSA's water-sports clubs, including Exeter Rowing Club, the oldest sporting club in Exeter, Exeter Canoe Club, Exeter British Sub Aqua Club and Exe Caliber Dragon Boat club have over 600 active members enjoying the wonderful environment offered along the canal and River Exe....and their connection to the city is evident by their club names.</p> <p>EWSA's aspiration is for continual development of its membership by encouraging more residents from Exeter, and beyond, to improve their lifestyles and health and well-being by participating in active, outdoor water sports in this fantastic location. Easy access to these activities for residents of Water Lane would surely be a positive contribution to the planning proposal?</p>	<p>Comment noted. Codes M04 and W05 are intended to ensure that water-related uses are promoted on the River and Canal, for example: through the provision of internal and external space for such activities; by requiring developers to engage with users of the Canal and River and the City Council at an early stage to understand their aspirations and requirements and define how these can be supported; by requiring development to allow sufficient space to safeguard the function of the working harbour, ensure good access to the Canal for water-related uses and ensure use of the Canal can increase in the future; and by requiring the provision of at least one craning point in the area that enables larger vessels to access the water.</p> <p>Code W02 has been amended to show 62 Haven Road as a site for residential-led development, with an opportunity for water-related uses fronting the canal basin (e.g., at ground level). The buildings and facilities used by the water sports clubs are, in planning terms, both community and sport facilities. As such, they are protected against loss by policy CP10 of the Exeter Core Strategy (under which the Council would expect any planning application to redevelop these buildings and facilities to provide or contribute towards the</p>

Name	Organisation	Comment	Response
		<p>Will you please advise if the development plan will, at some point in the planning process, include proposals for the buildings and associated facilities currently enjoyed by the water sports clubs?</p>	<p>provision of new and improved buildings and facilities) and policy L7 of the Exeter Local Plan First Review (under which the loss of sporting facilities which serve a local area will not be permitted if this would harm sports opportunities in the area). These two policies are proposed to be replaced by policy IC3 of the emerging Exeter Plan, which states that existing services and facilities that meet community, social, health...cultural, leisure and recreation needs will be protected, unless it can be demonstrated that they are surplus to requirements or sufficient/improved provision is to be provided. It also states that proposals to provide new or improved community services and facilities will be supported. Therefore, the water sports clubs' buildings and facilities are afforded a significant amount of protection under both the existing and emerging development plan.</p>
-	Historic England	<p>Thank you for consulting Historic England on this emerging SPD/Design Code document for Water Lane. As the Government's statutory adviser on the historic environment, we are keen to ensure that the conservation, enhancement and enjoyment of the historic environment are taken into account in the preparation of plans and associated guidance. We are largely supportive of the purpose of the SPD/Design Code to provide a positive framework for regeneration of part of the city of Exeter, while taking account of the character and historic features within and around the area. However, in seeking to do so we are concerned that the evidence base on which the document is founded is not yet sufficiently robust. More specifically, while we support increased development densities and change/innovation in this area, we also wish to ensure that these are sympathetic to local character and</p>	<p>Support noted and comment noted. The Council has undertaken further technical work to assess the impact of proposed maximum heights upon key views/heritage assets. Based on the evidence provided by this assessment, Historic England considers that the SPD is unlikely to result in significant effects on the historic environment that would trigger the need for Strategic Environmental Assessment. A proportionate Heritage Impact Assessment is being prepared for all sites proposed for allocation in the emerging Exeter Plan, including Water Lane, and this will be published in due course. The SPD has not been amended to code for materials and details. However, as new code (L29) has been added to clarify that matters that will be considered at detailed planning application stage will include material and detail, as</p>

Name	Organisation	Comment	Response
		<p>history including the surrounding built environment and landscape setting (see NPPF paragraph 130c, and National Model Design Code</p> <p>Part 2 Guidance Notes B.2.iii Height). We therefore consider the guidance/codes in this document relating to building heights and densities should be based on a robust evidence base that considers the character of the city, key views and associated heritage impacts (or opportunities for enhancement). Below we provide brief comments on the content of the SPD/Design Code along with conclusions and key recommendations in relation to the evidence base.</p> <p>The Design Code does not currently contain information on proposed building materials. We consider that it would be beneficial to include this for two reasons. Firstly, to provide a strategic steer on a preferred palette of materials that responds to local character, for example including use of red brick or local stone. Secondly to ensure that the built form, including roof scape, is recessive in views from Exeter to the surrounding countryside, and vice versa. There is an opportunity here to conserve and enhance built character, the settings of heritage assets, and the relationship between the city and its rural setting.</p> <p>Associated Strategic Environmental Assessment (SEA) Screening</p> <p>The current uncertainty around the status of the document either as a future SPD (i.e. guidance) or part of the Plan (i.e. policy) and its relationship with adopted and emerging</p>	<p>well as a range of other detailed matters (e.g., articulation, composition, windows).</p>

Name	Organisation	Comment	Response
		<p>policies, presents some difficulties when responding to the associated SEA Screening consultation. We have provided a separate but complementary letter of response to that consultation.</p> <p>4.3 Memorable places We note and welcome the following aspects of the Future Vision for Water Lane: ‘The industrial and maritime past of the harbour and Canal Basin, as a trading hub, is celebrated through an enterprising community spirit.’ ‘Standing on the waterfront, you can fully appreciate Exeter’s panorama with the Cathedral and church spires amongst clusters of trees and buildings.’</p> <p>4.6 Liveable buildings In the section on Responsive density and height, we note that the Future Vision for Water Lane includes the following: “The area has a high density of buildings, yet they have a human scale and never feel overbearing thanks to the variation in height and location of taller buildings in the right places.’ We consider that the SPD/Design Code needs to be supported by an evidence base that demonstrates that this aspiration can be achieved. See our comments on L03.</p> <p>Built form and scale The text in this section indicates that ‘important aspects which will affect the acceptability of proposed height and massing include: The setting of the Riverside Valley Park</p>	

Name	Organisation	Comment	Response
		<p>and the Quay, and key identified views within section M05'. While we generally agree with this statement, we have commented in relation to code M05 about the lack of clarity (and completeness) of the evidence base to support the key views diagram.</p> <p>Recommendations A 2021 study by LDA Design for Exeter City Council made the following recommendations: "that analysis is undertaken to inform design guidance relating to building heights across the city centre and adjoining Conservation Areas in order to protect the setting of heritage assets, including near and long-distance views of the Cathedral." We support this recommendation and promote the consideration of all proposed strategic site allocations in this work, including Water Lane. Priorities for the historic environment are:</p> <ul style="list-style-type: none"> - A robust evidence base relating to important views into, out of, and across Exeter including historically significant views (e.g., views of/from the Cathedral and City Walls). This would ideally form part of a wider study into building heights and densities, to inform both site allocation policies and more general development management policies; and/or - That proportionate HIA is carried out to inform the parameters of this SPD (and the associated site allocation in the Draft Local Plan) and to understand its potential impacts on the historic environment. <p>This research may, to some extent, have happened already in which case it would be useful for this information to be</p>	

Name	Organisation	Comment	Response
		<p>presented alongside the Plan/SPD. For example, to what extent have proposals in this SPD been informed by a robust understanding of the historic environment evidence base (e.g., characterisation studies, the National Heritage List, Historic Environment Record, and Conservation Area Appraisals)?</p>	
-	Devon Wildlife Trust	<p>Thank you for the opportunity to respond to this consultation. Devon Wildlife Trust limits its responses to issues affecting biodiversity and the environment.</p> <p>General comments</p> <p>Policy within the document needs to specify that site design must buffer existing vegetation corridors including the railway line to the west and the canal to the east. This is to allow the continued movement of species within these existing wildlife corridors, safeguarding the value of the vegetation for wildlife in the future. It is imperative that the built environment is not constructed directly adjacent to these corridors, which would lead to the attrition of their value over time. In addition, it is important to note that when buildings are constructed too close to wildlife corridors, light spill has the potential to disturb the movement of wildlife along the corridor. Policy needs to be included within the document which states that this must be considered in the site design. A lighting strategy or assessment which concludes that light spill will not impact on ecological corridors must be included within each application. Any mitigation measures must utilise permanent physical barriers such as hedge banks.</p>	<p>Comment noted. Code S04 requires all development proposals to preserve, restore and create wildlife habitats, corridors and networks and any other features of ecological interest, which will help to ensure that existing vegetative corridors are safeguarded. S04 also requires these corridors to be strengthened. Code Q09 requires development proposals to minimise light pollution and, where possible, contribute to the improvement of local environmental conditions. This will allow the impact of light spill upon ecology to be considered at the design stage.</p>

Name	Organisation	Comment	Response
		<p>Throughout the document, references to planting should include the terminology ‘appropriate, native, wildlife friendly, hardy and robust’.</p> <p>The Water Lane development is an opportunity to demonstrate that the highest standards in building design can be achieved. We would urge the council to make it a requirement that new housing associated within the scheme is carbon neutral/positive.</p> <p>The development will result in a significant increase in dog walking in the surrounding areas of green space including along the Canal and within Riverside Valley Park. This has not been considered within the document. Consideration should be given to the provision of a designated dog exercise area in order to alleviate the additional recreational pressure on the surrounding green space.</p>	<p>Comment noted. The SPD has been amended accordingly. Code S08 is specific to planting and requires it to be resilient, predominantly of benefit to wildlife, healthy and robust.</p> <p>Comment noted. The SPD must amplify adopted planning policy in the Exeter Local Plan First Review and Exeter Core Strategy and also cannot set requirements for building standards that exceed those set by the Government. Within these constraints, the codes in section 4.2 of the SPD seek to ensure that development minimises energy use and carbon emissions.</p> <p>Comment noted. The Council is not aware of evidence to demonstrate the need for a designated dog exercise area arising from development at Water Lane. However, as with all development in Exeter, developers at Water Lane will be required to mitigate the impact of development upon the Exe Estuary Special Protection Area through payment of a Habitat Mitigation Contribution, top sliced from the Community Infrastructure Levy payment. The mitigation measures that this money can be spent on are set out in the South-east Devon European Site Mitigation Strategy and include the creation of Suitable Alternative Natural Greenspace Sites (SANGs) as alternative locations for recreation, such as dog walking.</p>
		<p>1.2 Planning policy framework</p> <p>This section makes reference to the National Planning Policy Framework. However, reference to NPPF policies</p>	<p>Comment noted. Section 1.2 of the SPD references the statement in the NPPF that sustainable development includes making sufficient provision for the conservation and enhancement of the natural environment; and it</p>

Name	Organisation	Comment	Response
		<p>relating to wildlife are absent. It is essential that development considers the existing biodiversity value of the site and surrounding habitats from the conception of proposals to ensure that wildlife is properly considered throughout the design process. This will ensure that ecological networks are provided throughout the built environment, which are of benefit to both nature and the establishing community of residents, providing the community with everyday contact with nature. Section 1.2 should be updated to include reference to the following policies:</p> <p>NPPF para. 174 “Planning policies and decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”</p> <p>NPPF para. 180 “When determining planning applications, local planning authorities should apply the following principles: d) opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”</p>	<p>acknowledges that the NPPF is complemented by planning practice guidance for a broad range of topics, one of which is wildlife. Code S04 requires development proposals to demonstrate a thorough understanding of the ecological baseline and the opportunities for biodiversity enhancement; and to be supported by an ecological survey undertaken during early concept stage to inform the biodiversity net gain and open space strategy and shape the overall layout.</p>
		<p>Section 1.3 This states that ‘By 2040 Exeter will be a global leader in addressing social, economic and environmental challenges’, however the seven outcomes proposed by the 2040 Exeter Vision (of which there only appear to be five) do not contain reference to the environment. It is essential that</p>	<p>Comment noted. The additional two outcomes in the 2040 Exeter Vision have been added to page 12. Code S02 of the SPD reiterates the proposed policy in the emerging Exeter Plan that residential proposals should provide a range of open space in accordance with Fields in Trust benchmark guidelines and requires all new open space to be located to</p>

Name	Organisation	Comment	Response
		<p>strong commitment to developing liveable cities with access to green space for all should be included within these outcomes. We urge Exeter City Council to commit to delivering high quality accessible green space for all Exeter citizens within 15 minutes' walk of their homes.</p> <p>Liveable Exeter Principles</p> <p>Spaces for people and wildlife states that 'Exeter's urban and natural spaces are attractive and well-connected environments well used for recreation, active travel and for supporting wildlife'. We urge the Council to adopt higher aspirations that to merely 'support' wildlife. A change of terminology here such as 'enhance' or 'enrich' would provide a better outcome for development.</p> <p>The text which accompanies 'Liveable Buildings' should include reference to the requirement for buildings to be constructed to high environmental standards. This is again required in reference to Liveable Buildings in section 2.2.</p>	<p>ensure easy access. It also sets a range of quality requirements for the open space.</p> <p>Comment noted. The Liveable Exeter Principles have only recently been adopted by the Council and cannot be amended via consultation on the Liveable Water Lane SPD.</p>
-	Environment Agency	<p>Thank you for your consultation of 23 October 2023 in respect of this supplementary planning document. Our general advice in relation to the Supplementary Planning Document (SPD) along with specific comments on different chapters of the document are set out below.</p> <p>General Advice</p> <p>Redevelopment of the Water Lane area represents an important opportunity to create a community that is resilient to a changing climate and secures significant environmental improvements. The draft Liveable Water Lane SPD does include elements which will be important in achieving this. However, we consider there are some matters which need to be more strongly represented in the</p>	

Name	Organisation	Comment	Response
		<p data-bbox="562 237 913 264">SPD than they are at present.</p> <p data-bbox="562 309 1272 517">The SPD only refers specifically to climate change once, when discussing the Exeter vision for 2040 which includes addressing climate change. The climate emergency will result in profound changes, and it is essential that the SPD illustrates the ways in which redevelopment of the area will ensure a community that is adapted to our future climate.</p> <p data-bbox="562 922 1272 1161">The SPD makes no specific reference to the need to deliver a strategic flood evacuation route serving the Water Lane area. The provision of a strategic access route is fundamental to the delivery of a safe, sustainable and flood resilient community for the future. The SPD should refer to the work that is being undertaken to identify a potential route.</p> <p data-bbox="562 1209 1272 1378">Despite the past industrial uses in the area the SPD has not acknowledged that previous uses will have left a legacy of contaminated land. Given proximity to the water environment redevelopment will need to ensure sites are remediated and the risk of pollution eliminated. For clarity</p>	<p data-bbox="1296 309 2029 874">Comment noted. Climate change is specifically referred to in several places within the Code, including: the 'Outstanding Quality Future Vision for Water Lane'; the supporting text on page 39 which references the Council's net zero plans; code Q05 on Passive and Climate Responsive Design; code Q12 which encourages development proposals to calculate the impact on climate change from carbon emissions and demonstrate that embodied carbon has been minimised; code Q13 which requires development proposals to be resilient to climate change; code A13 which requires safe access and egress to be designed to take climate change into account; the 'Spaces for People and Wildlife Future Vision for Water Lane; code S07 in relation to Trees; and code S08 in relation to Planting. However, the Vision will be updated to refer to Water Lane becoming a catalyst for net zero and climate resilient regeneration across the city.</p> <p data-bbox="1296 922 2029 986">Comment noted. Code A13 refers to the need for a strategic safe access and egress route during times of flooding.</p> <p data-bbox="1296 1209 2029 1378">Comment noted. Section 1.1 of the SPD identifies contamination as one of the challenges that development at Water Lane will need to address. The Constraints and Opportunities Plan (page 145) notes that details of land contamination will be identified through planning application</p>

Name	Organisation	Comment	Response
		<p>this should be noted in the document.</p> <p>In addition, much of the area is underlain by a combined sewer network which takes both foul and surface water drainage. During periods of intense rainfall these systems can be overwhelmed and discharge untreated sewage via Combined Sewer Overflows to the water environment. Climate change is expected to increase the frequency and intensity of such rainfall events which will increase pressure on these systems. Simultaneously increasing the residential population of the area will result in increased foul flows to the sewer further stressing the combined system. Redevelopment of Water Lane therefore represents an important opportunity to remove surface water from the system and reduce the risks of both water pollution and sewer flooding. This should be acknowledged in the SPD.</p>	<p>processes. Applicants will be expected to comply with planning policy on dealing with contaminated land in accordance with the Government’s Planning Practice Guidance and policy EN2 of the Exeter Local Plan First Review (Contaminated Land).</p> <p>Comment noted. Codes Q02, Q10, Q13, A25, A26, S02 and S06 require Water Lane to incorporate sustainable urban drainage. Code S06 is specific to Sustainable Urban Drainage and requires this to be used for drainage wherever possible. The Future Vision for Water Lane on page 124 sets out that the site will be designed to help manage heavy rainfalls.</p>
		<p>Chapter One – Liveable Exeter Summary The Liveable Exeter Principles (pages 10 & 11) are noted. However, none of the principles specifically refer to the need for communities to be adapted and resilient climate change. This is a key principle which must underpin redevelopment of the Water Lane area, which will be at increasing risk of flooding as a result of climate change. The climate emergency should therefore be more prominent within this SPD.</p> <p>The ‘spaces for people and wildlife’ principle does refer to</p>	<p>Comment noted. The Liveable Exeter Principles have only recently been adopted by the Council and cannot be amended via consultation on the Liveable Water Lane SPD.</p>

Name	Organisation	Comment	Response
		<p>supporting 'a thriving wildlife'. For wildlife to thrive it is essential that development helps support nature recovery; creating new connections and places for wildlife to thrive. The SPD should consider how redevelopment of the area can help contribute to nature recovery and achieving the Lawton Principles of 'bigger, better, more joined up' ecological networks.</p>	
		<p>Chapter Two – Water Lane Today We note that the opportunities and constraints map (page 17) does not include flood risk, sewerage infrastructure or contaminated land as constraints. These are constraints which should be clearly acknowledged.</p>	<p>Comment noted. The Environment Agency has confirmed to the Council that the latest flood risk mapping for Water Lane is not yet available. The text to support the Constraints and Opportunities plan (page 145) explains this and notes that flood risk is a significant constraint. The Constraints and Opportunities Plan also notes that details of land contamination will be identified through planning application processes. Applicants will be expected to comply with planning policy on contaminated land and flood risk in accordance with the NPPF and Planning Practice Guidance, policy EN2 of the Exeter Local Plan First Review (Contaminated Land) and policies CP12 and CP17 of the Exeter Core Strategy. The Council will continue to work with South West Water to ensure that the sewage system is able to accommodate development at Water Lane. Additional text has been added to page 47 setting out the sewage infrastructure improvements needed.</p>
		<p>Chapter Three - Water Lane Principles The requirements for Water Lane under the 'Outstanding Quality' heading seek strategic consolidation of infrastructure (including flood risk) that doesn't compromise positive place-making. We would, however, caution that flood infrastructure must not be compromised. Climate adaptation and resilience means that place-making needs to be reimagined for the 21st</p>	<p>Comment noted and agreed. It is assumed that these comments relate to Chapter 4 of the SPD.</p>

Name	Organisation	Comment	Response
		<p>century; that traditional approaches to matters such as street scene, ridge heights, ground floor uses and levels may not achieve long-term resilient and sustainable places.</p> <p>Nonetheless, we welcome the 'Outstanding Quality' requirements which seek to ensure flood mitigation measures are well integrated with the overall design and positively contribute to place-making, and that measures contribute to a safe, resilient and future proofed local environment. The identification and delivery strategic flood evacuation route to serve residents of the Water Lane area will be a crucial element in achieving a safe, resilient and future proofed local environment. It will help to ensure that redevelopment is safe over its lifetime and helps to reduce risks to existing residents. The SPD should acknowledge the work that is currently being undertaken in this regard.</p> <p>We note that more detailed requirements will be set out within the Design Code in consultation with this Agency. We welcome this and look forward to working with you on the flood resilience elements of the Design Code for Water Lane.</p> <p>Regarding the section on 'Liveable Buildings', it is noted that the requirements include zero carbon or carbon negative buildings. Whilst this is important from a climate mitigation perspective, there is no reference to climate resilient buildings such as houses which are adapted to deal with periods of extreme heat.</p> <p>The section on 'Spaces for People and Wildlife' includes</p>	<p>Support noted. The conclusions of the Strategic Flood Risk Level 2 and Access and Egress Study will enable the Council to ensure that development at Water Lane provides a safe, resilient and future proofed local environment in terms of flood risk. Page 99 of the SPD has been amended to refer to the Study.</p> <p>Support noted.</p> <p>Comment noted. Code Q13 is specific to resilience. It requires development proposals to: consider regenerative building design and landscaping that is resilient to climate change over the development's lifetime; and to design infrastructure that is resilient to climate change.</p>

Name	Organisation	Comment	Response
		<p>some positive requirements, including connections to the Exe Valley Park, the urban greening factor, multifunctional spaces supporting flood mitigation and carbon sequestration, on site Biodiversity Net Gain (BNG) and drawing the waterfront character further into the site using positive place-making features like sustainable drainage systems (SuDS) and rain gardens. The SPD should build on these requirements. For example, the SPD should explore how delivery of BNG at Water Lane will help to optimise nature recovery opportunities and create linkages to and between existing habitats. At present the framework plan for spaces (page 44) shows east-west green connections which are important but does not show any enhancement in green space along the riparian corridor adjacent to the Exeter Ship Canal. Whilst it is recognised that such spaces will be multifunctional it is important that prioritising 'active travel' in these corridors shouldn't compromise the opportunity to deliver meaningful ecological network enhancements.</p> <p>The use of SuDS and rain gardens can bring significant multifunctional benefits in terms of more natural flood risk management, ecological enhancement, and improved water quality. For example, removal of surface water flows from the existing combined sewers in the Water Lane area and redirecting them to these features would be a tangible environmental benefit whilst freeing up capacity in the sewer for the inevitable increase in foul flows from new development.</p>	<p>Comment noted. Code S04 is worded to allow on-site biodiversity net gain to be used to support nature recovery strategies. Code S13 seeks to protect and maximise enhancement of the Canal in view of its role as a County Wildlife Site connecting the Riverside Valley Park and Exe Estuary.</p> <p>Comment noted. Codes Q02, Q10, Q13, A25, A26, S02 and S06 require Water Lane to incorporate sustainable urban drainage. Code S06 is specific to Sustainable Urban Drainage and requires this to be used for drainage wherever possible. The Future Vision for Water Lane on page 124 sets out that the site will be designed to help manage heavy rainfalls.</p>
-	-	<p>Firstly, while the development is envisioned for low car usage and seems to be aimed at the young professional market, it is essential to acknowledge that in the current</p>	<p>Comment noted. It is important that these needs are balanced. However, due to its highways access constraints, Water Lane must by necessity be a low car development. The</p>

Name	Organisation	Comment	Response
		<p>housing crisis people very often remain in smaller homes when they have families. Lifestyles change and are not lived in isolation from others, and accordingly, adequate provision for car parking spaces for residents and visitors, delivery services, taxis, and other vehicles is imperative to avoid detrimental impacts on pedestrian and bike access which is so key to the liveability of the area. Balancing the needs of different community members is crucial to the success of the project and this includes access for vehicles.</p> <p>I was alarmed to see recent plans for the redevelopment of the tenpin bowling site featuring fairly small flats for rental only, many of them built for flat share. I propose that alongside affordable and social housing, a significant percentage of the flats should be available for sale, to foster community engagement and provide residents with property ownership security. Additionally, implementing limits on Airbnb holiday lets and second homes would help preserve the local community's vibrancy.</p> <p>It is essential to ensure that the flats are built to a decent and aspirational size. Space standards reminiscent of post-war council housing were much better than we have today. All homes built should similarly be suitable for long-term living to a standard that all on the planning committee would find acceptable for themselves and their own families. This would contribute to creating a liveable and sustainable environment for the long term and help provide a model community.</p>	<p>SPD will assist the Council and its partners to deliver a neighbourhood where cycling and walking are the (safe) mode of choice, whilst allowing adequate provision for car parking.</p> <p>Comment noted. It is important that Water Lane is developed as a long-term and stable mixed community. Code W06 requires development to provide a mix of housing that caters for a broad demographic and takes account of local needs and states that housing typologies that are dedicated to a narrow demographic, such as co-living, must not dominate the area. The Government has recently consulted on a proposed change to planning policy that could give local planning authorities greater control over the creation of short-term holiday lets. Exeter City Council is awaiting the outcome of that consultation.</p> <p>Comment noted. The Council requires new homes to meet the Government's Nationally Described Space Standards. Co-living flats should meet the same standards, allowing for space that is provided in communal areas.</p>

Name	Organisation	Comment	Response
		<p>Preserving the existing Water Lane community is also of utmost importance. A key part of the community is the business district surrounding it which offers opportunity for varied work. Incorporating affordable business units would allow local entrepreneurs to serve the community with reasonably priced shops and small businesses. This inclusivity would be vital for preventing the displacement of the current mixed community. It would be awful if this new community were to end up like the waterside flats in Exmouth which are extraordinarily expensive, served mainly by tourist shops and barely inhabited throughout the year.</p> <p>Additionally, the new development must incorporate essential facilities such as medical services, schools, a library, parks, and new additional allotments. Additionally, access to affordable grocery shops, like those on Alphington Road, is critical for the well-being of the community. Improving pedestrian and bike access to these areas (Iceland, The Range, Aldi), as well as integrating existing roads like in the Ebrington Road area, would ensure a seamless and safe connection to new facilities. Pedestrian and cycling routes to Aldi along Alphington Road are currently woefully inadequate to take increased traffic from the water lane area. Being able to cross the railway bridge would make a huge difference to residents on both sides of the divide.</p>	<p>Comment noted. The SPD include a number of codes specific to the provision of employment space at Water Lane. For example, code W01 identifies 'employment' as one of the land-uses that must be provided for at Water Lane; code W07 requires development proposals to incorporate space for employment uses that are compatible with residential uses; and code C03 requires proposals to accommodate affordable workspace space suitable for creative and digital businesses and the Regulating Plan indicates 'Employment Opportunity Areas' within the site.</p> <p>Comment noted. It is important that Water Lane provides a range of services and facilities to meet the needs of residents, businesses and visitors etc. Code W01 sets out a range of uses that should be provided, including within the new neighbourhood centre. These include education (a primary school), healthcare, food and drink, leisure and community facilities. Codes elsewhere in the SPD expand upon these requirements. The Council is not seeking to provide allotments at Water Lane, but code S10 states that allotments can be provided through financial contributions for new allotment sites near Water Lane.</p>
-	South West Water	<p>SWW are happy to see the holistic consideration and inclusion of policies relating to positive water efficiency. The inclusion of policies Q02, Q03, Q05, Q10, Q13, W09 and S06 is supported by SWW in relation to requiring sustainable management of water resources.</p>	<p>Support noted.</p>

Name	Organisation	Comment	Response
		<p>One area SWW would like to see Exeter City Council go further in the inclusion of policy setting out expectations relating to the disposal of surface water. The use of rainwater harvesting (Q10), water storage (Q10) and SuDS (Q02, Q05, Q10, Q13, A21, A22 and S06) is fully supported by SWW. In terms of the practicalities of development, where the sole use of SuDS is unviable for the disposal of all surface water run-off, SWW suggest the inclusion of wording within policy to highlight the need to follow the established Surface Water Disposal Hierarchy as described within PPG (ref id: 7-056-20220825) and Devon County Council guidance (para 6.3, Sustainable Drainage System - Guidance for Devon - Flood Risk Management). In practice, and for the avoidance of uncertainty, this would involve the discharge of excess surface water that cannot be managed through SuDS to the Canal, as the nearest suitable watercourse.</p> <p>In terms of the proposed policies relating to the use of SuDS, the inclusion of multifunctional green streets is supported by SWW. The use of multifunction green infrastructure within water management strategies provides numerous benefits including water quality, nutrient neutrality, slow the flow, and many others; both social and environmental.</p> <p>We believe it would be beneficial to expand on the practical expectations for implementing policies like Q05 where it is stated that 'Development proposals must consider opportunities to utilize passive and climate responsive design approaches, and natural resource</p>	<p>Supported noted and comment noted. This level of detail is not considered necessary for the SPD and will be considered at planning application stage</p> <p>Support noted.</p> <p>Comment noted. Code Q05 has been amended accordingly.</p>

Name	Organisation	Comment	Response
		<p>systems on-site'. SWW read this policy to require proposals to consider water harvesting and recycling systems, as well as methods like using deciduous trees to provide seasonal solar gain regulation; however, clarity on the Local Authority's expectations for proposals would remove potential confusion for developers when in the early stages of developing proposals.</p> <p>It is anticipated that targets for increasing sustainable water consumption will be required in the future. As such, Exeter City Council may wish to explore implementing more ambitious water consumption targets than the 110 litre/person/day stated within the Building Regulations optional requirement G2. Alternatively, wording within draft policy Q10 could be modified to include phasing along the lines of 'Development proposals are encouraged to achieve a minimum water efficiency that requires an estimated water use of no more than 110 litres per person per day, or subsequent water efficiency targets promoted by the water industry or in building regulations.' Doing so may assist in "future proofing" draft policy against subsequent updates to best practices.</p> <p>Regarding the provision of necessary infrastructure for water and sewerage services, there will need to be network reinforcements to supply the whole of the Water Lane development. This will require upgrades to the water infrastructure with a new water main being required along Water Lane, Willeys Avenue and Alphington Street connecting into the trunk main at Exe Bridge. There will be capacity in the existing network for the first parcel of the development and once water infrastructure upgrades start,</p>	<p>Comment noted. Code Q10 has been amended accordingly.</p> <p>Comment noted. The Council will continue to work with South West Water to ensure that the sewage system is able to accommodate development at Water Lane. Additional text has been added to page 47 setting out the sewage infrastructure improvements needed.</p>

Name	Organisation	Comment	Response
		<p>it will take circa 24 months to design and construct these upgrades. From a wastewater network perspective, the site is not expected to create any difficult challenges for the disposal of its waste flows. However, there will be a need to carry out further assessment of Tan Lane Sewage Pumping Station, where the development flows will be conveyed, in order to understand the impact of growth caused by Water Lane and other future developments in the area, including the proposed redevelopment of Marsh Barton in the draft Exeter Local Plan, so that the risk of any increase in spill performance from the overflow at the pumping station is reduced. Any need for investment will be captured and delivered as reinforcements are required.</p>	
-	Devon and Cornwall Police	<p>I appreciate I have fed back some of the below previously and note that some designing out crime principles have been included within the SPD for which I am grateful. However, given the importance of the development and that designing out crime and reducing the opportunity for crime and anti-social behaviour (ASB) is vital to the success of such schemes and ensuring a safe environment in which to live and work. Would it be possible and practical to have a design code relating solely to designing out crime / Crime Prevention Through Environmental Design (CPTED) principles and ensuring that all development considers and embeds such principles?</p> <p>The principles are relevant to all forms of development, residential, commercial, public open space, car parks, retail etc. and are summarised below:</p> <ul style="list-style-type: none"> • Access and Movement: Places with well-defined and well used routes, with spaces and entrances that provide for 	<p>Comment noted. The SPD has been amended with the addition of a new code about designing out crime. The code makes specific reference to the CPTED principles.</p>

Name	Organisation	Comment	Response
		<p>convenient movement without compromising security.</p> <ul style="list-style-type: none"> • Structure: Places that are structured so that different uses do not cause conflict. • Surveillance: Places where all publicly accessible spaces are overlooked; have a purpose and are well managed to prevent creating areas which could attract criminal activity, the antisocial to gather or for unacceptable behaviour such as dumping and dog fouling etc. to go unnoticed. • Ownership: Places that promote a sense of ownership, respect, territorial responsibility and community. • Physical Protection: Places that include necessary, well-designed security features. • Activity: Places where the level of human activity is appropriate to the location and creates a reduced risk of crime, fear of crime and a sense of safety at all times. • Management and Maintenance: Places that are designed with management and maintenance in mind to discourage crime, fear of crime and ASB. <p>The principles above have shown to reduce the opportunity for crime and ASB and also reduce the fear of crime and ASB. If they could be included as a Design Code or perhaps within the Outstanding Quality / Building Performance Standards / Welcoming Neighbourhood sections or embedded as much as possible as you see appropriate, it would be appreciated.</p>	
		<p>Two aspects that I did have some concern about having commented on an Outline planning application for the area, was a 'canopy footway' / sheltered shop fronts and substantial undercroft parking. Caution should be taken with both as such spaces can be prone to lacking sufficient surveillance opportunities and attracting unwanted</p>	<p>Comment noted. The inclusion of a designing out crime code in the SPD will enable the Council to require consideration of these matters from the outset of the planning application process.</p>

Name	Organisation	Comment	Response
		<p>congregation, rough sleeping and ASB. There is evidence of this within Exeter's city centre and attempts should be made to avoid similar issues. Underground / undercroft parking must be secure and not too prevalent, with unauthorised access prevented, and sheltered / recessed spaces / shop front / residential entrances should be avoided.</p>	
-	-	<p>Comments in attachment!</p>	<p>Respondent did not upload an attachment. ECC have made contact to request the attachment, but a response has not been received.</p>
-	-	<p>Why should we believe that 'consultation' is not a huge waste of time and money, given your track record over years:</p> <ul style="list-style-type: none"> -£10m of wasted public money on Exeter Living' -Huge overruns on St Sidwell's Point when there were other places to swim and failure of plans for the surrounding area -Pusillanimous response to fraudulent use of Section 21 for Rosebarn Park affecting over 70 families. <p>Loss over years of great tourist opportunities, from the 17 span bridge over the River Exe, destruction of the amazing Southgate and support for the lamentable Cranbrook Estate- a monument to corporate greed and failed building.</p> <ul style="list-style-type: none"> -Constant lies about student numbers that only the Exeter Digest revealed through Freedom of Information requests. -Gridlock. -A City Centre fit only for a gulag and University self-interest <p>You can take it that I am not a fan and believe that all those involved in these fiascos should tender their resignations. You're just lucky that people are too tired, stressed and supine to deal with you properly.</p>	<p>Comment noted. In preparing the final version of the Liveable Water Lane SPD, the Council has taken into account all of the consultation responses received. Where considered appropriate, the SPD reflects the input of consultees.</p>

Name	Organisation	Comment	Response
-	National Highways	<p>Thank you for consulting National Highways on the Liveable Water Lane Supplementary Planning Document (SPD) – Development Framework and Design Code (October 2023).</p> <p>National Highways has been appointed by the Secretary of State under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The Water Lane site is centrally located in Exeter and considers roads which are part of the Local Road Network for which Devon County Council is highway authority. However, the SRN skirts Exeter’s boundary, including the A30 and M5, which has the potential to be affected by growth proposals within the city.</p> <p>We endorse the SPD principles, which are in accordance with National Highways guiding planning policy document, DfT Circular 01/2022, which identifies in plan-making local authorities should facilitate high quality places and ensure that developments optimise the potential of sites to support local facilities and sustainable transport networks. This too forms a component of developing a ‘vision-led’ approach to transport planning which sets an outcome communities want to achieve and provides the transport solution to deliver those outcomes. National Highways strongly supports development that reduces reliance on the private car.</p> <p>We are in ongoing conversations with Exeter City Council on transport evidence relating to the emerging Exeter Plan, which considers the Water Lane site (acknowledging this is a pre-existing allocation in extant policy for Exeter). It is</p>	<p>Comment noted. The Council will continue to work with and consult National Highways England on all planning policy documents and relevant planning applications, to ensure that they meet with National Highways’ requirements.</p>

Name	Organisation	Comment	Response
		<p>noted that the active street proposals are supported through a parking ratio, with an indicative average of 1:5 parking to dwelling ratio quoted. We anticipate the approach in this SPD will be further considered between us as the transport evidence is refined, ensuring implication on transport networks is understood and appropriate matters are secured in policy.</p>	
	<p>PCL Planning / Waddeton Park Ltd</p>	<p>I write in reference to the consultation on the draft “Liveable Water Lane: Development Framework and Design Code SPD” and the opportunity to make representations on behalf of our clients, Waddeton Park Ltd.</p> <p>On behalf of our clients, PCL Planning Ltd have previously set out relevant concerns regarding the overall strategy of the emerging Exeter Plan and its approach towards delivering a sufficient supply of housing to meet identified needs. We have previously set out that a Plan reliant on sites that are undeliverable will not have been positively prepared and will not be effective.</p> <p>The Plan-led approach in Exeter has already been jeopardised by an inability to manage land supply through the Development Plan (by a significant shortfall of around 2,000 new homes against minimum delivery target). This has resulted in the delivery of much needed new homes being progressed through lost appeals, outside of a plan led context. This failure to plan to provide sufficient housing has been compounded by a misplaced focus on a range of non-viable/non deliverable areas/sites. The consequence of course being the widening of the gap between the most vulnerable in our society who cannot access housing and those already decently housed who will</p>	<p>Comment noted. The majority of comments made are strategic and relate to the Exeter Plan, rather than to the SPD.</p> <p>As regards the SPD, Water Lane is a longstanding site allocation Exeter’s development plan. Development at Water Lane will contribute towards meeting the City Council’s current housing requirement. Developer/landowner interest in bringing land at Water Lane forwards for development is now being shown. This in itself indicates that Water Lane is a viable development prospect. The SPD has been amended to give greater emphasis to the importance of collaboration and joint working. For example, the section about collaboration (in the context of delivering a successful neighbourhood) has been moved forwards in the SPD to appear at section 2.4; and codes relating to the delivery of key infrastructure (e.g., W04 – primary school) have been amended to stress the need for collaboration to resolve delivery matters. Deliverability, phasing and viability work by the Council and stakeholders to support the delivery of development at Water Lane is ongoing. Details of this work do not need to be included in the SPD.</p>

Name	Organisation	Comment	Response
		<p>benefit from increasing house prices (underpinned by a continuing supply).</p> <p>We have previously outlined the Council's poor track record of facilitating the redevelopment of brownfield sites, with Water Lane being one example of this. Having been allocated for housing in the Exeter Local Plan covering the 1995-2006 Plan period, it was further identified in the Exeter Core Strategy adopted in 2012 and is now again proposed to be allocated in the emerging Local Plan. Despite this the site has still not come forward.</p> <p>Delivery and implementation matters have consistently been overlooked by the Council when dealing with difficult brownfield regeneration sites like Water Lane. Instead, a 'design-led' approach is taken which fails to be cognisant of those critical matters relating to implementation. If there is no route map or plan for delivery of such sites addressing critical matters of site assembly and impacts on existing businesses then visions, masterplans, design frameworks and codes will remain paper exercises and fail to deliver outcomes on the ground.</p> <p>All of these concerns remain very relevant to the draft Water Lane SPD. Whilst the substantial visioning, design content and ambition is laudable, it says everything that out of a document that runs to 154 pages the 'Delivery' section is covered in just 2 pages. From the outset of the draft SPD it is recognised that Water Lane is a complex site, containing a variety of land uses including business premises and utility infrastructure alongside a range of others. However, the document fails to deal with any</p>	

Name	Organisation	Comment	Response
		<p>deliverability and viability issues.</p> <p>Like the emerging Local Plan before it, the SPD does not tackle matters of site assembly/decanting of existing uses/costs and timescales involved in both site assembly and remediation. Nor does it recognise the resulting viability challenges from the heavy tax burden on new residential development (including CIL, S106 and other planning requirements) compared to existing use values. These are significant but very realistic risks to delivery and should be fully explored and recognised in the SPD. In not doing so it fails to meet the objectives of the current allocation of Water Lane in the adopted Core Strategy (Policy C17) which requires a “comprehensive approach to the delivery of development...”</p> <p>Instead the “Delivery” section sets out an ad hoc application by application approach to delivering individual sites and the assessment of viability, with no comprehensiveness or viability assessment of the proposals as a whole. Without this there is no way of knowing if there is any basis of realism for the ambitions for the site or the extent of parameters of deviation that are likely to occur.</p> <p>Q17 identifies that co-ordination will be left to individual landowners and/or promoters and the need for development proposals to demonstrate their co-ordination with other sites. Whilst the SPD alludes to the role of the Council in supporting this co-ordination, this appears to be through the development management process and the overseeing of design principles rather than a more</p>	

Name	Organisation	Comment	Response
		<p data-bbox="562 236 1189 300">fundamental role in ensuring the right conditions for delivery are in place.</p> <p data-bbox="562 347 1272 699">We have set out previously in our representation on the emerging Local Plan, that the Council’s view of large scale brownfield sites as being single entities is flawed. Water Lane, as is the case with many of the large regeneration schemes is not a site – it is an area which is in multiple ownerships. They are not assembled sites ready for development. It cannot be assumed that owners are realistically interested in bringing them forward for development (as opposed to ‘banking’ a fallback position in case of current business/tenant failure).</p> <p data-bbox="562 746 1267 1018">There is no evidence to suggest that the Council has the resources and expertise to carry out such a challenging land assembly exercise nor indeed does the SPD suggest that the Council consider this to be a role they should play. However without there being a strategy that properly considers these matters the opportunity to bring Water Lane forward in a comprehensive and effective manner will continue to not be realised.</p> <p data-bbox="562 1066 1272 1378">There is no evidence in the SPD that any serious attempt has been made to assess the obstacles to delivery that clearly exist (such as evaluating the existing landownership and leasehold interests that exist and the embedded values therein), costs of redevelopment and remediation, costs of superstructure construction, programmes for business closures or the decanting of existing uses (and if the latter is to be pursued where, and at what cost, are relocation sites available?). These are all matters that have been</p>	

Name	Organisation	Comment	Response
		<p>raised previously through a variety of different consultation exercises but remain unaddressed in terms of forming a coherent strategy.</p> <p>Indeed the SPD confirms the continued deferral of these important matters in the “Delivery” Section on page 133 which states: “There are several different landowners, developers and infrastructure providers within the Water Lane area and at time of writing, there is no master developer for Water Lane. This brings with it challenges for ensuring a coordinated and timely delivery of the infrastructure and public realm needed to deliver a cohesive neighbourhood. Exeter City Council will be leading the collaborative process required and are expecting all stakeholders to fully engage with this process. A joint delivery and phasing plan will be required at some point in the future once all infrastructure requirements for the whole area are fully understood.”</p> <p>The lack of a delivery strategy clearly undermines the confidence in Water Lane coming forward. As mentioned above its non-delivery despite having a positive policy basis to encourage redevelopment now spans plan periods of nearly 30 years and two previously adopted local plans. With no consent or comprehensive strategy in place this is likely to be repeated for the next (emerging) plan period. During that time the businesses that have operated and continue to operate from this area have provided an important source of jobs for members of Exeter’s community. This needs to be recognised.</p> <p>Whilst the SPD includes significant reference to community</p>	

Name	Organisation	Comment	Response
		<p>and stakeholder engagement and identifies that this included local businesses, the exercises appear to have been focussed on visioning matters rather than practical delivery matters. Clearly the need to fully engage with and understand landowner and local business intentions and options will need to be a fundamental part of any delivery strategy for Water Lane.</p> <p>In terms of housing mix the SPD focusses on the provision of flatted development and apartment living. Whilst that approach may be appropriate for the Water Lane site it does need to be recognised that this in itself will raise deliverability issues, particularly in respect of delivery within an effective timescale.</p> <p>If schemes are to be delivered via the market, there is a limit to the number of apartments that the housing market can absorb and the more unpredictable development finances in relation to flatted development alongside remediation costs is likely to raise viability issues. This may then put into doubt some of the key planning requirements expected through the SPD, including affordable housing. Without recognising these risks and having a coherent delivery strategy there will be a slow take up of development opportunities and a perpetuation of under delivery of housing in the city with again those in most need for affordable housing losing out.</p> <p>As set out above we have consistently raised concerns regarding the lack of a robust and deliverable plan for the delivering of housing in the city. We will continue to make representations urging the Council to take a more balanced</p>	

Name	Organisation	Comment	Response
		<p>view towards what makes an effective Development Plan and the need to make provision for a range of sites and a broad mix of dwelling types in order that all sectors of the market can be 'fed' at a rate that it can 'absorb', and that a concentration of a particular type of site and types of development coming forward simultaneously is to be avoided.</p> <p>The Water Lane SPD justifies our earlier reticence regarding the Council's approach towards site selection in the emerging Local Plan and the limited success over many of years of facilitating redevelopment of large-scale brownfield sites. Despite having been allocated for many years without coming forward on the basis of significant challenges (i.e., multiple site ownership, difficult site assembly, decanting of existing uses, costs of remediation etc), the SPD fails to get to grips with these challenges or indeed acknowledge some of them at all. Instead, it takes the assumption of a bare site and sets out a visioning and design led approach towards creating a utopia rather than recognising the delivery and implementation challenges that will be faced along the way.</p> <p>It is vitally important that these challenges are recognised, fully understood and responded to in the overall strategy for Water Lane. This is alongside recognising that there are significant risks in "putting all the eggs in one basket" and to identify a range of sites to meet a variety of housing needs. Otherwise, another plan period will pass by characterised by non-delivery, appeal losses and an ineffective and undermined Development Plan.</p>	

Name	Organisation	Comment	Response
		<p>Thank you for the opportunity to comment. I would be very grateful if you could please keep me informed of the outcome of these representations and the progress of the SPD via the email address: planning@pclplanning.co.uk.</p>	
-	University of Exeter	<p>The University of Exeter welcome the Liveable Water Lane SPD and is pleased to have the opportunity to provide comments on its content.</p> <p>The University recognises that Water Lane represents a key strategic brownfield redevelopment opportunity for the city and is supportive of the ECC's aspirations to support the delivery of a new sustainable neighbourhood.</p> <p>The Illustrative Development Framework (Section 3.2) identifies land known as Grace Road Fields as a wildlife, nature and renewable energy opportunity.</p> <p>Design code principle S15 explains that proposals for Grace Road Fields should be developed in collaboration with the Council and other stakeholders to ensure a comprehensive strategy for the future use of the site. Acceptable uses of the land include a new energy centre and solar farm.</p> <p>Officers will be aware that the University are in discussions with Exeter City Council regarding the provision of a new energy centre in this location as part of its plans to develop a city-wide heating network.</p> <p>The University is supportive of supplementary planning guidance that prioritises the delivery of a new energy centre and related infrastructure for the benefit of the</p>	<p>Support noted. Provision of an energy centre at Grace Road Fields would be in line with the illustrative development framework and land uses identified in code S15.</p>

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		University, other organisations, and institutions within the city.	
-	Exeter Cycling Campaign	<p>Thank you for giving the Exeter Cycling Campaign the opportunity to comment on the proposal for the redevelopment of the southern Water Lane area. This is a significant project, which has the potential to be an exemplar sustainable urban development for Exeter. The Exeter Cycle Campaign is supportive of the approach to mobility within the scheme, and we have highlighted some of the key aspects below:</p> <ul style="list-style-type: none"> ● Embedding 15 minute neighbourhood principles with access to a good range of services and amenities within easy walking and cycling distance. ● The ambition for a low-car scheme, with restricted vehicle access streets, and future adaptability of parking spaces to reduce reliance on the private car. ● Proposals for a mobility hub for e-bike, cargo bike and electric car hire to reduce reliance on the private car. ● The ambition for people focused streets which are pleasant to walk and cycle through with less space for vehicles and more opportunities for planting, social and community space. ● Proposed 20mph speed limit. <p>This is an outline application with all matters reserved other than the main access and mix and quantum of uses. Our comments have therefore focused on the proposed access arrangements with high-level comments where further detail will be provided at the reserved matters stage.</p>	Support noted. The consultation comments relate to live outline application 23/1007/OUT, but are also relevant to the SPD.

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		<p>Recommendations (in blue below) about this development centre on wider connectivity, cycling and walking within the site, and the provision of cycle parking. We would ask that these concerns are seriously considered and addressed. Thank you.</p> <p>Illustrative Access and Movement Plan Figure 6.5, Water Lane, Planning Design and Access Statement, August 2023 (check pdf)</p> <p>1. Cycling and walking connections to the site Overview The transport assessment recognises that the site is well located to the existing local pedestrian and cycle network but also that the quality of routes varies. The ambition of a low-car development on this scale, with high levels of active travel, will only be realised if walking and cycling connections to the site are frequent and of good quality. There is also the opportunity to improve strategic walking and cycling routes which run through or near the site.</p> <p>Tan Lane Underpass Tan Lane and the railway underpass through to Marsh Barton form part of route E15 within the draft Local Cycle Walking and Infrastructure Plan (LCWIP). The intention to open up a second archway under the railway to enable a cycle and pedestrian route through to Marsh Barton is welcomed. However, the onward connection, through the signalised section of Tan Lane, south to Exton Road needs to be considered at the same time. Currently the narrow width of the carriageway and the narrow raised pavement</p>	

Name	Organisation	Comment	Response
		<p>with railings creates an intimidating and inaccessible environment for cycling and walking.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> ● 1.1 Provide developer contributions towards improving Tan Lane up to Exton Road to provide a safe onward cycling and walking route. This may require the pavement being made level with the carriageway and railings removed and/or widening of the road. <p>Gabriel's Wharf Underpass</p> <p>The existing railway underpass is very poor, with blind corners and limited headroom requiring many users to duck. The proposed alignment of Foundry Lane appears as though it crosses over the route of the underpass at a higher level which could create an even more unpleasant route with a longer tunnel. This link is important as one of the few crossings of the railway.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> ● 1.2 Proposals should be put forward as part of the application to improve this important link for walking and cycling, including providing adequate head room, lighting and lines of sight to create a convenient, attractive, and safe link. This should include developer contributions where necessary. <p>Water Lane North</p> <p>The proposal for the northern section of Water Lane to become a linear park with pedestrian and cycle priority is welcomed as this will provide an important route for future residents and workers to and from destinations to the</p>	<p>Comment noted. Code A30 requires development proposals to support improvements to key off-site active travel links. Tan Lane and Exton Road are identified in the code as one of these key links. Code A29 requires the second underpass at Tan Lane to be opened up, including to allow for improved active travel use.</p> <p>Comment noted. Code A30 requires development proposals to support improvements to key off-site active travel links. The Gabriel's Wharf underpass is identified in the code as one of these key links. Code A29 states that the link should be improved to achieve a convenient, attractive, safe, step-free crossing over or under the railway.</p>

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		<p>North and West including St Thomas, St David's Station the University and the city centre via Exe Bridges. Currently there is no continuous footpath along this section of the road.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> ● 1.3 Suggest that a continuous footpath should be made for this section of Water Lane to enable a safe walking route from the new development for the period prior to its transformation into a linear park. ● 1.4 Ensure the whole length of Water Lane, including sections adjacent to the proposals site, is developed in a coherent way to create clear direct routes for people cycling along the length of the route, and avoid disjointed sections. <p>Canal Path</p> <p>The illustrative access and movement plan notes potential pedestrian improvements to the canal towpath between Gabriel's Wharf and Cotfield Street. The proposed route E14 within the draft LCWIP is routed via this section of canal path, which provides a more direct and convenient route than the current signposted route for cyclists via Cotfield Street. This section of path is currently very narrow, which not only presents a barrier to cycling but also to other users with mobility scooters, pushchairs etc.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> ● 1.5 Provide developer contributions towards improving and widening this section of Canal Path to accommodate a wider range of users and form part of the new cycling route E14. 	<p>Comment noted. Code A30 requires development proposals to support improvements to key off-site active travel links. The entirety of Water Lane North (outside the allocation) is shown as a key existing and proposed active travel route that could be improved under code A30. Code A02 has been amended to clarify that segregation of users (e.g., along Water Lane) will be sought in accordance with Local Transport Note 1/20 and where space in the carriageway allows.</p> <p>Comment noted. Code A28 requires developers to explore options to widen the towpath to accommodate cycle use alongside an increase in pedestrian use.</p>

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		<p>Alphington Road Railway Bridge There is currently no footpath under the railway on the eastern side of Alphington Road. This is a key desire line from the development, and neighbouring residential area, to the nearest supermarket, Aldi on Alphington Road. The transport assessment notes there was a fatal accident with a pedestrian at this location in 2018.</p> <p>Recommendation: <ul style="list-style-type: none"> ● 1.6 Provide developer contributions towards creating a footway on the eastern side of Alphington Road under the railway. </p> <p>Potential New Canal Bridge The illustrative access and movement plan notes a potential new canal bridge to improve pedestrian and cycle connectivity, connecting from Gabriel's Wharf to the River Valley Park. Improving active travel connections to the river Valley Park is welcomed.</p> <p>Recommendation: <ul style="list-style-type: none"> ● 1.7 Ensure any proposed bridge is effectively linked with routes within the park including direct cycling connections to national cycle route 34. </p> <p>Disused Railway Line The disused railway line running through Marsh Barton towards Alphington Sainsbury's provides a great potential future active travel route. The route would provide access to services and amenities within Marsh Barton for</p>	<p>Comment noted. Code A30 requires development proposals to support improvements to key off-site active travel links. Alphington Road is identified in the code as one of these key links.</p> <p>Comment noted. Code A27 has been amended to state that the bridge should link to route E22 of the LCWIP.</p>

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		<p>Lane south of Cotfield Street towards the new 'Water Square' at Gabriel's Wharf. Water Lane has the potential to become a new active travel spine through the wider area of development, and the design of this section should create a direct and coherent link between the northern and southern sections of Water Lane. A shared surfaced route for this short section has the potential to create an indirect route broken by side streets, which would not be suitable for higher cycle volumes.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> ● 2.2 Ensure cycle infrastructure creates a direct and coherent route along Water Lane. Consider on carriageway cycling if vehicle movements are low enough to support this (as LTN1/20) or segregated cycleways with priority over side streets. <p>Water Lane South</p> <p>The transport assessment and illustrative access and movement plan describe a cycle priority route on the southern section of Water Lane set back from the canal behind existing mature trees. This section forms part of route E14 within the draft local cycle walking and infrastructure plan (LCWIP). The existing cycle route within the carriageway is direct and clear with very little vehicle traffic. The route shown is 'wiggly' and could be seen as less direct and coherent than the current route.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> ● 2.3 Retain the cycle route on the canal side of the existing trees to continue to provide a direct and coherent 	<p>Comment noted. Code A17 has been added to the SPD to seek clear and coherent cycle provision along Water Lane. – question for LDA. This includes enabling on-carriageway cycling through planning for low traffic volumes. Code A02 has been amended to clarify that segregation of users (e.g., along Water Lane) will be sought in accordance with Local Transport Note 1/20 and where space in the carriageway allows.</p> <p>Comment noted. Code A17 notes that this route is an important active travel connection where walking and cycling should be prioritised. It will be important that the Canal is lit</p>

Name	Organisation	Comment	Response
		<p>route. Provide upgraded lighting to this section of the route in line with the draft LCWIP.</p> <p>Tan Lane Tan Lane forms part of route E15 within the draft LCWIP, and links new developments in south west Exeter with the city centre via Marsh Barton. It is also a key desire line for future development in Marsh Barton to the quay and the city centre. The transport assessment and concept site access plan below show a segregated pedestrian/cycle route linking from the railway underpass to the junction with Water Lane. It is unclear from the description whether the route is shared, but it appears that cycle and pedestrians are segregated on the plan. It's also not clear from the plan how cycles join/ leave the carriageway at the junction with Water Lane and Willey's avenue.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> ● 2.4 Provide a continuous segregated cycle route, separated from pedestrians, from the railway underpass to the junction with Water Lane in line with LTN 1/20 guidance including minimum widths. Ensure the cycle route has priority over the side access to Smith's Court. Develop the design of the junction of Tan Lane, Water Lane and Willeys Avenue to ensure a clear route from the carriageway to the segregated cycle lane, in line with LTN 1/20 junction guidance. <p>3. Cycle parking The transport assessment notes that cycle parking will be provided throughout the development in line with adopted standards. Given the ambitious low-car nature of the</p>	<p>for safety reasons, but as explained in code S13, the lighting solution must avoid impact on bats and other wildlife.</p> <p>Comment noted. Code A30 requires development proposals to support improvements to key off-site active travel links. Tan Lane and Exton Road are identified in the code as one of these key links. Code A02 has been amended to clarify that segregation of users will be sought in accordance with Local Transport Note 1/20 and where space in the carriageway allows.</p>

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		<p>scheme and central accessible location it is likely that a higher percentage of future residents will want to own a bike than average, and a higher quantum of cycle parking than current ECC standards should be provided.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> ● 3.1 Increase target cycle storage levels to meet best practice as LTN 1/20 design standard, including one residential cycle parking place per bed (section 11.3 and Table 11-1). ● 3.2 As more detailed designs are developed cycle parking provision should be designed to accord with best practice as LTN1/20 to accommodate a wide range of cycle types, users and functionality. <p>The Exeter Cycling Campaign is supportive of dense, brownfield, low-car developments and we're eager that this development is a success. The concerns we have raised here will mean this scheme can meet its aspiration to become a trailblazing development where cycling and walking are the travel modes of choice for many residents. This development, along with others within the Wider Water Lane area, will set the standard across the city for other low / no car developments. In particular, it will shape how the developments at Water Lane and Marsh Barton are designed. It is important therefore to set the bar high in terms of quality and ensure the city's key strategies of Liveable Exeter, Exeter Vision 2040, the emerging Exeter Plan and Water Lane Supplementary Planning Document are fully realised in this development. The cycling campaign is happy to engage with the applicant as more detailed</p>	<p>Comment noted. Code A12 requires cycle parking to be provided in line with current government best practice.</p>

Name	Organisation	Comment	Response
		designs are prepared to ensure the active travel vision is realised.	
-	East Devon District Council	<p>We would not want to comment on many matters of detail in your proposals. However, we do wish to express concerns around the way in which you have failed to address, from our review, the need for employment and job provision. On the 9 January 2024 the Strategic Planning Committee of East Devon District Council received a report in respect of the Exeter City local plan – Draft Plan (Regulation 18) consultation. East Devon District Council raised significant concerns around the potential failure of your local plan to address and accommodate full city-wide quantified levels of employment generating uses in the city over the life span of your local plan.</p> <p>We note that the Greater Exeter Economic Development Needs Assessment, in paragraph 10.2.6, (as on your web site and as referenced in your local plan – paragraph 15.10), reports a “requirement of 43 – 57 ha of industrial land over the Plan period” in the city. We also note the requirement for “8-30 ha of office space”. From our review of your local plan it is not clear, however, how or where these or other appropriately quantified and justified levels of employment land will be accommodated within the city and therefore how levels of net new job generation will be provided for in Exeter. This should specifically include jobs (new and existing) in not just transformational sectors but also in essential traditional, long-established and mainstream work sectors that underpin the economy.</p> <p>We raise these concerns in the context of the SPD as Water Lane is a long-established employment area in the city that</p>	<p>Comment noted. The future employment strategy for Exeter will be provided for in the Exeter Plan, informed by ingoing Duty to Cooperate discussions with stakeholders including East Devon. The SPD amplifies existing policy in the adopted Exeter Local Plan First Review and the Exeter Core Strategy. The Local Plan First Review highlights that appropriate uses at Water Lane may include “more environmentally acceptable” employment uses (as part of mixed-use redevelopment) and this is reflected in the wording of code W07, which also encourages proposals to provide existing levels of employment floorspace.</p>

Name	Organisation	Comment	Response
		<p>has in the past and continues to support considerable levels of essential employment uses. Many of the jobs accommodated in the Water Lane area are needed to support the public and their needs as well as the economy more widely – however, many are for uses and in sectors that may not be good neighbours to residential uses and new residential developments.</p> <p>In your local plan policy for Water Lane - Reference 15 (Strategic policy) – you advise of “the retention of existing levels of employment floor-space in phases up to 2040”, however, it is unclear how or if this can be achieved or secured in practice and we note that you reference floor space levels rather than job numbers and also you fail to reference the type of employment sectors that will be accommodated. In the SPD you advise, however, of the Water Lane area accommodating “more environmentally acceptable” employment uses and under - W01 - General land use and activity – you advise of accommodating “employment uses compatible with residential”.</p> <p>As you do not quantify overall employment land/job needs (including for all sectors and job types) in your draft local plan (or cross-reference to relevant evidence) we have significant concerns that your proposals for Water Lane will exacerbate potential problems of job retention and provision in the City of Exeter and we are unaware of how or where in the city any jobs displaced from Water Lane will be accommodated.</p> <p>You show on page 52 of the SPD (W02 - Land use plan) a small area that is shaded and referenced as “Employment</p>	

Name	Organisation	Comment	Response
		<p>opportunity area (W07)". But we cannot see any quantified references in the document to what this means in practice, nor indeed to amounts or levels of employment uses that may be accommodated elsewhere in the Water Lane area. Nor can we see information on the numbers of jobs or make up of existing jobs or the physical extent of land currently in employment uses. We would emphasise the apparent smallness of this employment opportunity area and unless (perhaps) you envisage very high-density job uses (high staff to floorspace ratios such as may be achieved for some multi-story office-based activities) then we would suggest a potential significant under [1] provision of employment use is set out in proposals and also a lack of provision for a full range of job types.</p> <p>We would suggest that a thorough review of the SPD (specifically in the context of local plan considerations around job provision and any review the local plan may require) is undertaken before proposals are progressed. Based on past and current uses of the Water Lane area for job generating activities we would see this as a very good area for employment activity to serve the city and a wider surrounding area. That is not to say that it might not be a good location for other and altogether different uses and activities (which we believe you are promoting). But if you are to actively promote these alternatives then it should be undertaken within the context of demonstrating how you will ensure you will meet and deliver full Exeter city employment needs, for all job types, within the city boundary. This should include net new jobs that may be created in the future and any displacement resulting from redevelopment at Water Lane or anywhere else.</p>	

Name	Organisation	Comment	Response
-	Exeter Port Authority	<p>Thank you for the opportunity to comment on the initiative to develop the areas within the proximity of the Exeter Ship Canal and the Water Lane area. Whilst I fully appreciate the need of find more space for housing in the area, there has to be an awareness that Exeter City Council has a statutory responsibility to maintain navigation through the Exeter Ship Canal and as part of that responsibility there is a need to keep clear areas around the water for logistical and other reasons detailed below for the service to continue. It should be noted also that the canal is a working stretch of water, vital to local trade and cannot simply be a backdrop to residential housing.</p> <p>Gabriel's Wharf</p> <p>Firstly, Exeter Port Authority objects to the potential loss of Gabriel's Wharf as a facility to lift vessels from the water. Gabriel's is of enormous value operationally because of the ground make up and space associated. There is no other ECC owned location along the canal where vessels over 20 tonnes can be lifted clear of the water.</p> <p>Without having the capacity to lift the heaviest of vessels that visit the canal the Exeter Port Authority would have to limit the size of vessels that enter the canal to less than 20 tonnes which is unacceptable, particularly as the Port of Exeter has now been granted Heritage Harbour status and the Exeter Port Authority is looking to once again attract vessels of considerable size to the Basin and Quays.</p> <p>The importance of Gabriel's was brought into sharp relief in October of 2022 when a large (65 tonnes) former fishing trawler sank whilst alongside at the wharf. The costs of the</p>	<p>Comment noted. It is important the SPD enables the Council to fulfil its statutory responsibilities in respect of the Ship Canal. Amendments to the document have therefore been made, as set out below.</p> <p>Comment noted. Code W11 has been amended to state that Gabriel's Wharf is required to safeguard a craning point and vehicle access for articulated lorries and a crane.</p>

Name	Organisation	Comment	Response
		<p>environmental clean-up and lift out/disposal of the vessel was over £160K, had the capability of lift out at that location not been available and the vessel sank at any other mooring in the canal the costs would have been far higher. It was fortuitous that the vessel sank there and not elsewhere. It is a statutory obligation for the Council to maintain an effective oil-spill pollution plan and Gabriel's Wharf is an important component in that plan. Gabriel's Wharf is a working quay and is important as an emergency facility for the good of the Council and the wider community, without it the Council would not be able to offer the same level of service.</p> <p>Secondly, the Exeter Port Authority objects to any withdrawal of dedicated road access (and storage/vehicle turning space) for the access of large articulated vehicles and cranes (up to 300 tonnes capability) to access the quay for the lifting of vessels to and from the water for all the reasons outlined above.</p>	
		<p>Canal bank maintenance</p> <p>The development of the site may need the canal tow path to be blocked off whilst the construction of any development is done south of Gabriel's as far as the Solar farm. This will mean that any canal bank repair work needed to be done in an emergency will be extremely difficult to do. This might be overcome by developers putting in sheet piling along that stretch of the canal to shore up the canal bank on the West side thus negating the need for any repair work to be done. Similarly, any closure of the canal tow path however temporary will have detrimental effect on the operational effectiveness of the</p>	<p>Comment noted. Closure of any part of the towpath during the construction phase of development will need to be carefully controlled, to minimise impacts upon the operation of the Canal.</p>

Name	Organisation	Comment	Response
		<p>canal operatives when canal convoys or passages by commercial vessels are done. The nature of the work involving a passage by craft up and down the canal requires the team of operatives to move quickly by vehicle to the next bridge or lock once a vessel has passed through the obstacle to be at the next crossing ready to swing the gates or bridge to allow the smooth passing of the boat before closing the same to move onto the next location. By having access along the tow path restricted and having the team to go by road around the different places will add considerable time to any passage, meaning that the Stuart Line cruises might not be able to go ahead whilst the construction on the site is being done because the ships' master needs to be able to enter and leave the canal on the same tide; because of the length of the trip and the time it would take to get all the gates/bridges and locks open in time then the tide would be missed thus stranding up to 200 passengers in the wrong place so that operation is unfeasible.</p>	
		<p>Proposed new bridge across the Exeter Ship Canal</p> <p>Exeter Port Authority object to any added bridge crossing of the canal. Any potential new bridge would add extra time to the already tight timetable of managing staff time and resources when vessels are transiting along the waterway. Any added bridge would slow the operation down; would need to be electrically operated and if not, have sufficient air-draught to the same height as the M5 motorway bridge (10.3m). Any extra bridge of lower height would also render useless any proposed slipway at Gabriel's because there would be nowhere for craft to go. To illustrate, any small craft entering the water at Gabriel's</p>	<p>Comment noted. Code A27 has been retained in the SPD because Devon County Council have advised that there is a need for a new pedestrian and cycle crossing of the canal to increase permeability, support active travel and improve access to the River Valley Park from the Water Lane area. The need for a crossing is identified in the Local Cycling and Walking Infrastructure Plan adopted by the County Council in 2023. However, it is important that the new crossing does not hinder canal operations. The SPD is clear that the crossing will need to be informed by feasibility work, including engagement with canal stakeholders. The need to ensure the continued navigation function of the canal will be taken into account in this work.</p>

Name	Organisation	Comment	Response
		<p>would not be able to go further down the canal if a near bridge were installed and could only go a short distance to the left of only 500 metres to the next bridge upstream at the King's Arms gates. Furthermore, any extra bridge would mean that more pontoons would have to be installed either side of the bridge for transiting craft to tie up to whilst waiting for the bridge to be opened. These extra pontoons might have to be up to 50 metres in length each side. The canal at this location is not wide and restricting the channel further would pose an unacceptable hazard to navigation. It may well be possible to tunnel under the canal with drainage pumps etc. but a new bridge across would hinder canal operations and not needed.</p>	
		<p>Risk of fire on board vessels</p> <p>Unfortunately, there is a chance that vessels alongside any quay might catch fire. Any development anywhere along the canal must leave adequate space between the water and buildings so that a fire appliance can be not only driven through but have enough space for the firefighting crew to work in dealing with a fire, particularly in areas where boats may be moored close to a residential area.</p>	<p>Comment noted. It is important that emergency vehicles are able to access Water Lane. Codes A15, A19, A20, A21, A23, A25 and A26 require the main routes (Water Lane, the Neighbourhood Street, Haven Road/Maritime Court, Foundry Lane, Michael Browning Way), Green Streets and Green Lanes to include sufficient space to accommodate emergency vehicles.</p>
		<p>Overshadowing of the water</p> <p>Creating shadows across water can affect navigation, particularly if ships' masters cannot see ahead into darkness created by overshadowing buildings, this is evident in other areas of mixed residential and industrial waterways in other parts of the country.</p>	<p>Comment noted. The Council is satisfied that the maximum building heights coded for in the SPD will not affect navigation of the canal.</p>
		<p>Venturi effect of wind across the water in restricted areas</p>	<p>Comment noted. The Council is satisfied that the maximum building heights coded for in the SPD will not affect navigation of the canal.</p>

Name	Organisation	Comment	Response
		<p data-bbox="562 236 1274 443">High rise building projects on both sides of a restricted waterway can have a detrimental effect on boat handling and navigation. A 'venturi' effect is created by any apparent wind accelerating between high buildings that straddle the waterway thus increasing that wind speed hindering boat operations.</p> <p data-bbox="562 488 1274 762">In conclusion, the Exeter Ship Canal and surrounding infrastructure are an integral part of the Waterways service that the Council has ownership of and needs to be preserved for the good of the people of this city. As mentioned earlier, the success of the waterways depends on retaining space around the water to maintain the statutory obligation of keeping the canal navigable and safe for all to use.</p>	