

Mr P Twamley  
Planning Policy Section,  
East Devon District Council,  
Knowle, Station Road,  
Sidmouth,  
EX10 8HL

Date: 17/10/2018

Letter ref: CP/00257

Dear Mr Twamley,

### Exmouth Neighbourhood Plan Submission Document

We are writing on behalf of our client Exeter Trade Frames Ltd who are based in Exmouth and control the land shown on the attached plan, which is currently subject to an appeal (ref: APP/U1105/W/18/3201622). We welcome the opportunity to make representations on the submission version of the Exmouth Neighbourhood Plan (NP).

**Policy EE2** states applications for a change of use from an employment use to residential, leading a to a reduction of employment, will only be supported if the existing site is no longer economically viable and the site has been marketed at a realistic price for a minimum of one year.

We support that change to Policy EE2 which requires a minimum of one year of marketing instead of two for applications for a change of use from employment use to residential which is more consistent with the Local Plan. However, the supporting text (paragraph 15) refers to the Doyle Centre as a potential example of where the redevelopment of employment generating sites for housing has undermined the intention to prioritise the maintenance and creation of new employment opportunities.

The Doyle Centre site was previously used as a day centre falling within Use Class D1 (non-residential institution) of the Town and Country Planning (Use Classes) Order 1987 (as amended).

It was not used for purposes falling within Class B of the Use Classes Order or similar uses classified under planning legislation as 'Sui Generis' uses. It should not therefore be identified as an employment site within the paragraph 15 of the NP because it has never been one.

We therefore request that this negatively worded reference to the site be removed from the NP.

Bullet point 1 of paragraph 15 states that a change of use from employment generation uses to residential should not be allowed unless '*the change of use applicant can demonstrate through a viability assessment that no viable employment use can be identified for the site*'.

There is no requirement within the Local Plan or national planning policy for the applicant themselves to undertake a viability assessment, indeed previous marketing and viability information can be used in support of an application regardless who it was undertaken on behalf of. We therefore suggest that this text is reworded to remove the reference to the applicant.

Bullet point 3 of paragraph 15 states that a change of use should not be allowed unless 'the premises has been offered to any community development organisation at market value'. This does not form part of policy EE2 or Strategy 32 of the Local Plan. Strategy 32 includes a requirement that options for retention of the site or premises for its current or similar use have been fully explored without success. It is therefore considered that this requirement should be removed from paragraph 15.

It is also pertinent that the Doyle Centre site effectively lies to the rear of supported living housing on Norton Place which adjoins the site to the south. The vehicular access to the site is provided via Norton Place along a road which runs between the existing supported living housing to the south and the boundary of the site. Traditional employment uses, certainly B2 and B8 uses, would significantly harm the amenity of these vulnerable residents through noise, disturbance and the type of traffic that would need to use Norton Place to access the site. Such uses would be incompatible with the adjoining supported living housing. Existing housing also adjoins the site at close proximity to the west and north-west.

We support the increase to the affordable housing requirement threshold within the NP area to sites of more than 10 dwellings in line with the Local Plan policy, as set out on **Policy H2**.

We trust that these comments will be taken into account. If you require any further information, please do not hesitate to contact us.

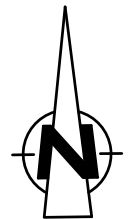
Yours sincerely,

**CATHERINE KNEE**

Principal Planner



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Proposed Residential Development at Land  
Adjacent to Salterton Road, EXMOUTH

**ara**  
architecture

Location Plan

Job No 7487 - LP

Scale 1:1250 @ A4

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