

Representations to East Devon District Council's Regulation 19 Local Plan

McMurdo Ref 24010

Prepared on behalf of Mr Azim Lalani

22/1910/MFUL Devoncourt Hotel 16 Douglas Avenue
Exmouth Devon EX8 2EX

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Appendix 1 Site Plan

1. Introduction

1.1 We make representations to East Devon District Council (EDDC)'s Regulation 19 Local Plan on behalf of our client, Mr Azim Lalani, owner of the Devoncourt Hotel, 16 Douglas Avenue, Exmouth, Devon, EX8 2EX.

1.2 Planning application 22/1910/MFUL for:

“Demolition of the existing Devoncourt building and outbuildings, construction of 51 open market and 15 affordable residential apartments and new 65 bed hotel with access via Maer Road car park, associated car parking and landscaping works”

was refused at committee despite a recommendation for approval and is now subject of an appeal.

1.3 These representations relate to that site, which we respectfully ask is allocated for development in line with the above named planning application in emerging policy SD01.

2 Site and Surroundings

- 2.1 The Site is located on the southern side of the south western part of Douglas Avenue between that road and Maer Road within easy walking distance of the full suite of facilities.
- 2.2 On the Douglas Avenue side of the site, the built form presents as a collection of large buildings with many extending close to the road, presenting an elongated, haphazard form of development. Though Douglas Avenue is a wide avenue, this part of the site looks like the “rear” of a sizeable, poorly extended over time, building, at the end of its useful life, negatively impacting on the character and appearance of the area.
- 2.3 Currently, there are two vehicular access points to the site, both from Douglas Avenue. There are four pedestrian access points to the site: two from Douglas Avenue; one (as conveyed) from Maer Road; one as established over time from the Maer Road car park.
- 2.4 From the north, the site slopes gently to the south, through gardens, to where its southern boundary meets a green strip of land and the Maer Road car park beyond that; in the south western corner of it, there is a long established pedestrian access from the site to the Maer Road car park and a conveyed pedestrian access from the site to Maer Road.
- 2.5 Though the building is used as a hotel currently, the dominant use of the area is residential.
- 2.6 The Site is:
- in the Built Up Area Boundary of Exmouth, the district’s largest town;
 - in an area where the dominant use is residential;
 - within easy walking distance of the full suite of facilities.

3 Proposed Development

3.1 The proposed development is for:

- The demolition of the existing 51 bed Devoncourt Hotel;
- The construction of 51 open market apartments (1-3 bedroom) and 15 affordable residential apartments (1 and 2 bedroom);
- The construction of a 65-bed hotel (i.e. no loss of hotel bed spaces);
- The retention of one vehicular access from Douglas Avenue in lieu of two accesses from Douglas Avenue;
- The provision of a new vehicular access to service the new hotel via Maer Road car park across the green strip ;
- The provision of car parking and landscaping works (including a play area and areas of open space)

3.2 Access points are proposed from Douglas Avenue and Maer Road car park. If the new hotel cannot be serviced by motor vehicles from Maer Road car park, it will be serviced from Douglas Avenue in this manner. The two pedestrian links to the south of the site from Maer Road (as conveyed) and Maer Road car park (an established right) and will remain whatever the appeal decision.

3.3 At the northern part of the site, the existing four storey hotel would be replaced with three apartment buildings housing 51 apartments at a similar height (“northern apartments”).

3.4 On the southern part of the site, another apartment block containing 15 affordable apartments (“southern apartments”) would be constructed on the existing gardens of Devoncourt, together with the 65 bed hotel, gym, and restaurant.

4 Comments on Policies SP01 SP02 SP03 SP05

Support

4.1 Our client supports policies SP01 SP02 SP03 SP05 as far as they relate to Exmouth.

5 Comments on Policy SD01

Object

Reasons

Our client's site is in:

- in the Built Up Area Boundary of Exmouth, the district's largest town;
- in an area where the dominant use is residential;
- within easy walking distance of the full suite of facilities

and should form part of policy SD01, which allocates land in the built up area boundary of Exmouth, especially when it will deliver much needed housing and affordable housing.¹

Suggested Amendments Required

Add our client's land to the policy, effectively allocating as:

- *Land at Devoncourt Hotel Douglas Avenue Exmouth for 51 open market and 15 affordable residential apartments and a 65 bed hotel.*

¹ Exmouth is the area of greatest housing need in East Devon. Over 1,000 (one thousand) households are on East Devon District Council's housing register for 1 and 2 bedroom accommodation in Exmouth (i.e. not 1,000 in the district; 1,000 only in Exmouth).

6 Comments on Policy CF02 Loss of Community Facilities

Object

Whilst we support the sentiment of this policy, “community facilities” need to be defined tightly on such a restrictive policy.

Moreover, there needs to be an understanding that on occasion there could be justification for the loss of a community facility because that loss would lead to greater social and/or economic and/or environmental gains that would justify the loss.

Reasons

For such a restrictive policy, “community facilities” need to be defined tightly.

The tests do not include words effecting “unless it is proven that there would be other greater social and/or economic and/or environmental gains to justify the loss.”

Suggested Amendments Required.

Define “community facilities” and reconsult;

Add another “test” to include such words.

7 Conclusion

7.1 We trust our comments will be taken into consideration as the plan progresses.

Appendix 1 Site Plan



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