

East Devon Local Plan 2020–2042 Second Regulation 19 Publication Plan Consultation

Former Co-op Foodstore, West Street, Axminster

On behalf of The Co-op Group Food Limited

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1. INTRODUCTION

- 1.1. Pegasus Group is instructed by the Co-op Group Food Limited (Co-op) to make representations to the East Devon Local Plan 2022–2042 (EDLP) Regulation 19 Consultation (2025).
- 1.2. This representation is submitted in relation to the site controlled by Co-op which previously operated as a Co-op Foodstore. The site closed in December 2025 as the Co-op relocated to a new store on Lyme Street.
- 1.3. Co-op welcome the production of the EDLP, wish to support the Council in its preparation and want to bring the Council and in turn the Inspector up to speed in relation to the situation on the Co-op site.
- 1.4. Against this context, some of the evidence base, principally the retail evidence base, is becoming out of date and not reflective of ‘facts on the ground’. Aligned with this, modifications will be required to the Plan in relation to the site.
- 1.5. This representation also sets out some comments in respect of various policies, to ensure all relevant policies are fully supported by the necessary evidence so the Council can go on to prepare and adopt a sound Local Plan and deliver against its requirements.
- 1.6. To assist the Local Plan process, the main aim of this representation to ensure that the Local Plan is consistent with national policy, specifically addressing the tests in paragraph 36 of the 2024 NPPF.

Report Structure

- 1.7. The structure of these representations takes the following form:
 - Section 2 describes the site and the surrounding;
 - Section 3 reviews the evidence base;
 - Section 4 considers the Draft EDLP;
 - Section 5 provides a conclusion.



2. SITE AND SURROUNDINGS

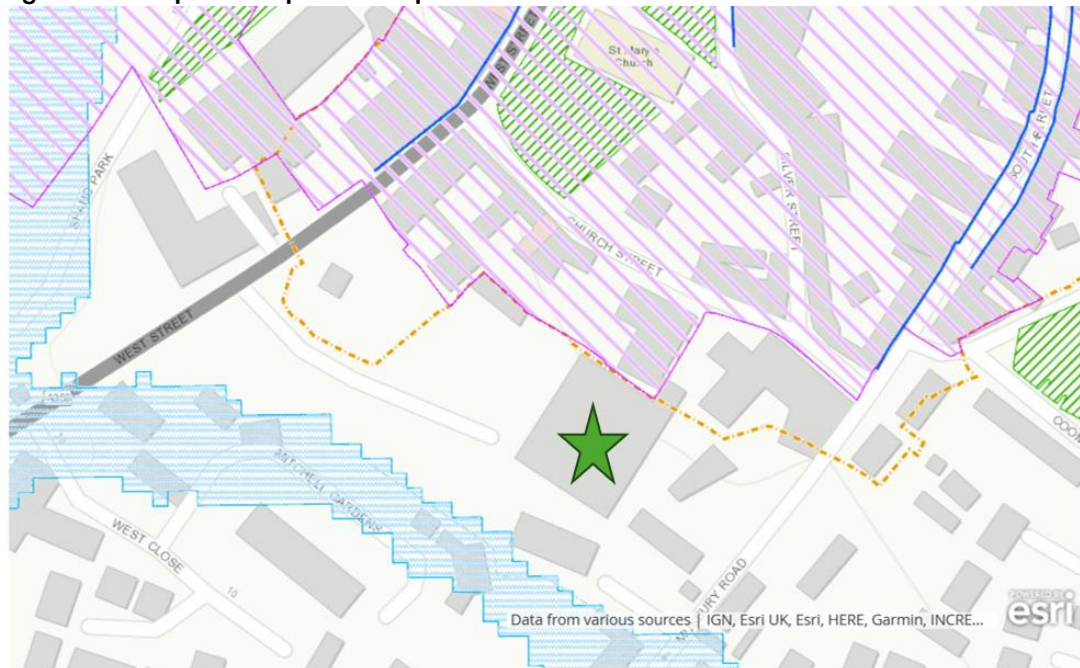
The Co-op

- 2.1. The Co-op is one of the world's largest consumer co-operatives, owned by millions of members. It is also:
- the UK's number 1 funeral services provider
 - a major general insurer
 - a growing legal services business
- 2.2. As well as having clear financial and operational objectives and employing 54,000 people, it is a recognised leader relating to social goals and community-led programmes. Co-op exists to meet members' needs and to stand up for the things they believe in.
- 2.3. The Co-op Group has its origins in the co-operative consumer societies started by the Rochdale Pioneers.
- 2.4. In 1863, independent co-op societies formed including the Co-operative Wholesale Society (CWS). They provided Co-op products to sell in hundreds of Co-op stores. More recently this was re-branded to The Co-operative Group (Co-op).
- 2.5. Co-op manages over 4,000 buildings across the UK. The Property team is responsible for buying, selling and looking after the buildings Co-op own.
- 2.6. The Team find the right places to open new food stores and funeral homes and make sure properties are:
- Safe
 - Well-maintained
 - Energy efficient
- 2.7. As such, the buildings Co-op operate from need to be fit for purpose and ultimately align with the overarching operational objectives.

Former Co-op Food, Axminster

- 2.8. The Axminster Site is located within the built-up area boundary of Axminster, but outside of the Town Centre Shopping Area and Conservation Area, according to the adopted Local Plan Policies Map.

Figure 1 – Adopted Proposals Map Extract



- Green Star – Former Co-op Building
- Purple Lines – Town Centre Area
- Blue Lines – Primary Frontage
- Orange dash – Conservation Area

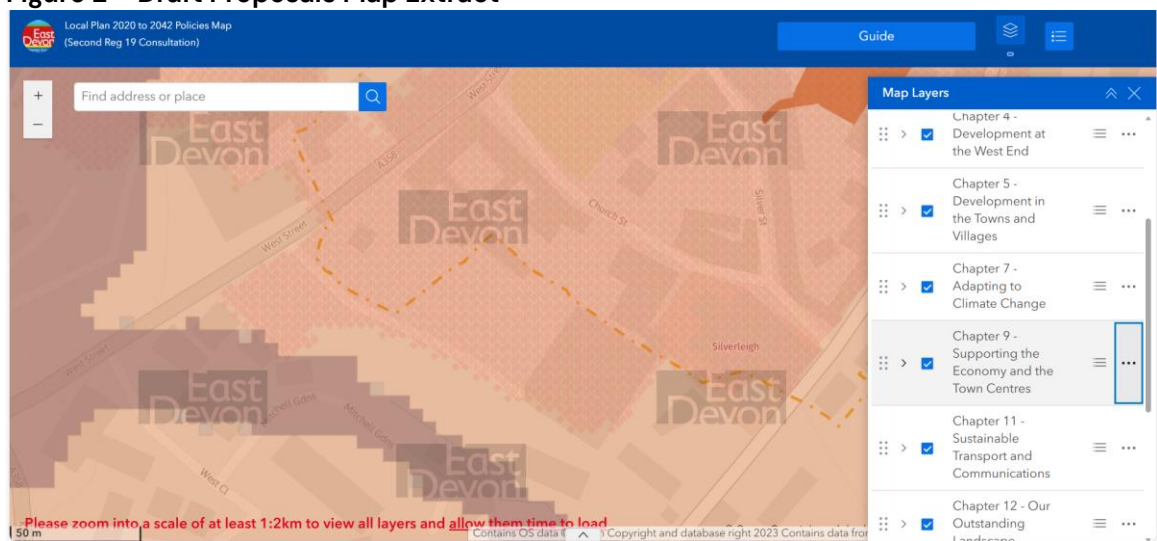
- 2.9. The Site is not within an area at risk of flooding and does not include any Listed Buildings. The Site is unallocated land in the Local Plan and is not subject to any other land use designations that would either protect the site for retail use or prevent the development of the Site for housing, in principle. Being located within the settlement boundary and currently adjacent to the town centre of Axminster, it is self-evidently a sustainable location for development.
- 2.10. As part of the 2022 Call for Sites, Co-op confirmed it was assessing its future options for this Site. As part of this, it submitted this Site to the Council for consideration for an allocation to help meet the Council's housing land supply. The preamble to the Call for Site submission form confirms that the Council, at the time, were particularly looking for small, brownfield residential sites that are sustainably located within or adjacent to settlement boundaries. This Site meets all these criteria (albeit the site area is less than 0.3 hectares).
- 2.11. Two options were included in support of the call for sites submission, together with a constraints and opportunities plan. Both are indicative to provide an estimation of the likely housing yield from the Site based upon the site area and constraints. The Site would be accessed from West Street as per the existing arrangement and no additional land take is proposed. The Site extends to 0.21 hectares.
 - **Option 1** includes 10 no. 3 storey, 3 bed houses with 11 parking spaces arranged with private amenity space for each house. A landscaped buffer is provided to the rear of the gardens to provide a buffer to the existing buildings to the south. 2

- **Option 2** provides 20 no. 1 and 2 bed apartments set over four storeys (11 no. 2 bed and 9 no. 1 bed apartments). 21 parking spaces are proposed along with a mix of communal and some private amenity space for residents on-site.

Current situation

- 2.12. The Co-op Food store closed in December 2025.
- 2.13. Despite informing the Council the Co-op was considering its options for the site and also submitting the site to be considered for alternative uses, the Council have proposed to add the former store into the Town centre boundary, as shown on the emerging Proposals Map extract below:

Figure 2 – Draft Proposals Map Extract



Pink brick – Primary Shopping Area
 Orange dash – Conservation Area

- 2.14. Co-op has relocated to a new store on Lyme Street. The new store is within the Town Centre and Primary Shopping Frontage and provides a total of 376sq m internal floorspace with 232sq m sales floorspace which is more appropriate to Co-op's operation and better reflects the demand for convenience provision in the centre.

3. EVIDENCE BASE REVIEW

- 3.1. Given the stage of the process of the EDLP, there is a reasonably well-developed evidence base to support the plan. An overview of this is provided below:

ECN-011 – Greater Exeter Town Centre and Retail Study Part One (September 2017)

- 3.2. This Study was jointly commissioned by East Devon District Council (EDDC), Exeter City Council (ECC), Mid Devon District Council (MDDC), Teignbridge District Council (TDC) in partnership with Devon County Council. The objectives of this study, as identified in the brief issued by the Councils, are as follows:
- A review of salient retail and town centre trends across the UK in order to set the context for developing a retail and town centre strategy in the GESP;
 - A series of town centre health checks covering all of the main town centres in the MDDC, TDC and EDDC administrative areas;
 - An updated survey of household shopping patterns covering an area which is sufficiently wide to gather data on convenience and comparison goods;
 - Assessments of quantitative and qualitative retail floorspace need for each of the main settlements in the ECC, EDDC, TDC and MDDC administrative areas
- 3.3. Axminster is covered in this Study, albeit the findings of this are now considered out of date and should not be used to inform decisions over the upcoming Plan period.
- 3.4. Nevertheless, and as context Axminster's health is covered in Section 6, Pg 118 onwards. It sets out at para 6.168 that *"the defined Town Centre Shopping Area covers West Street, Castle Street, Chard Street, Victoria Place, Lyme Street, Victoria Place, South Street and Church Street, along with the Tesco supermarket (and car park) at Shand Park. There is also a defined primary frontage which runs along West Street, Silver Street, Trinity Square, Chard Street and the southern end of Victoria Place"*.
- 3.5. The healthcheck is summarised at para 6.196 confirming that *"Axminster is a reasonably healthy town centre. The current land use profile identifies the town has an above average proportion of convenience goods retailers including a large Tesco supermarket and a number of independent convenience goods retailers. However, the centre only attracts under half of first choice main food shopping trips from the local area, and just over half of top-up food shopping trips"*.
- 3.6. There is no assessment of need within the part one study, despite the overview set out above claiming it would.

ECN-012 – Greater Exeter Town Centre and Retail Study Part Two – Retail Needs Assessment and Retail Strategy (December 2019)

- 3.7. It is clarified in the introduction that the part one Study did not cover needs, as initially anticipated, so this part two study sought to provide an assessment of the quantitative and qualitative retail floorspace need for each of the main settlements. This includes Axminster within East Devon District Council area.
- 3.8. It also makes recommendations regarding the various tiers of the ‘town centre’ hierarchy in the Greater Exeter area and a recommended strategy for each town.
- 3.9. It is also supported by a new shopper survey, although there is no date to confirm when this was undertaken and the raw results are not available for any detailed interrogation.
- 3.10. Specifically in relation to Axminster, the Part Two Study sets out:
- Para 3.12 – "Table 9g in Appendix II indicates that existing convenience goods stores attract £21.4m of expenditure which can be compared with a much higher benchmark turnover for these stores of £42.7m. This suggests a **significant over-supply of convenience goods floorspace in the town, to the tune of -1,780sq m net**. The stores contributing to this situation are the two largest stores in the town centre – Tesco and the Co-op store on West Street – which are both trading well below their respective company average performance levels" (Pegasus Emphasis).
 - Para 3.13 – "Table 10g indicates that the current study area derived turnover of the town [for comparison goods] is higher than the benchmark turnover of the town (which has been brought forward from the most recent East Devon retail study and updated to a 2019 base level). This suggests an indicative capacity of 930sq m net at 2019, rising to 1,167sq m net at 2024 and 1,546sq m net at 2029. We do not consider that there is an overriding need to plan for this modest uplift in comparison goods floorspace in Axminster bearing in mind the size of the town, the state of the comparison goods sector and the likelihood that any significant comparison goods in this part of Devon is likely to be directed towards Exeter."
- 3.11. Axminster was confirmed, at the time, of accommodating around 14,600sqm of floorspace.
- 3.12. In respect of the proposed hierarchy, it was recommended to be identified as a smaller centre.

ECN-007 – Evaluation of Town Centre and Retail Policy Boundaries and the threshold for the Sequential Test (September 2023)

- 3.13. This topic paper is prepared to consider the current retail situation in East Devon and seeks to justify the policies within the emerging Local Plan. Para 1.3 sets out that it provides an assessment of boundaries for town centre and retail policies and explains why the national sequential test threshold is inappropriate and a lower threshold is justified in East Devon.

- 3.14. For the avoidance of doubt, national policy does not include a threshold for sequential assessments, only impact assessments.
- 3.15. The topic paper confirms that the NPPF 2018 removed the expectation for local authorities to define primary and secondary frontages within their town centres. In light of this, it used the December 2023 NPPF definitions, which was the most up to date iteration of the NPPF at the time.
- 3.16. The definitions within the 2024 NPPF are largely unchanged, except for the addition of concert halls, hotels and conference facilities within the definition of main town centre uses.
- 3.17. The paper also sets out various reviews as to the role of town centres, including the report (parliament.uk) around high streets and town centres in 2030 which helpfully sets out a vision for town centres which will act as:
- Activity-based community gathering places;
 - Retail is a smaller part of a wider mix;
 - Green space, leisure, arts/culture, health & social care services, housing; and
 - Space for social & community interactions
- 3.18. The paper also references the Build Back Better High Streets Paper which identifies five priorities for centres, including *“Planning flexibilities around change of use; enabling vacant commercial premises to be demolished and a new development right to convert empty shops, restaurants and offices into homes”*.
- 3.19. To support the paper, town centre assessments were undertaken in September 2022 (Table 3, para 3.18). Town centre areas are covered from para 4.7 onwards and confirm that *“The policy approach advocated is one of defining Town Centre Areas to encompass broad central areas in towns where there is existing retail and commercial activity and potential to accommodate more activity”*.
- 3.20. Para 4.8 sets out that *“Primary Shopping Areas are the areas within the town centre where most retail activity is concentrated”*, going on to set out that *“Other uses, including residential, that would undermine the shopping and leisure function of the Primary Shopping Areas will be resisted as non-active use and ‘blank’ frontages will lessen the offer and appeal to visitors”*.
- 3.21. It also confirms that *“In most cases the town centres are relatively compact and are focussed around the concentration of retail/leisure uses. In these cases, the Town Centre Areas and Primary Shopping Areas will be the same and the boundaries will be concurrent.”* this appears to be the case for Axminster.
- 3.22. The survey results for Axminster are discussed on page 19 and the associated survey plans are provided thereafter. For ease, the area around the former Co-op store is extracted below:

Figure 3 – Extract from Axminster Assessment



Orange (adjacent to nursing home) – former Co-op Store

Yellow lines (pink lines on subsequent page – PSA) – TCA

- 3.23. At the point in time of the survey (September 2022), the Co-op store was occupied and correctly noted above as a foodstore. Accordingly, this Paper (September 2023) recommends that as part of the emerging development plan, the centre should be extended in the location of the now former Co-op.

Site Allocations – SAL 005 – Axminster (February 2025)

- 3.24. The Co-op site was assessed as part of the site allocations assessment paper. The site starts on Pg 11, identifying the site and then assessing its suitability for residential development. The site is acknowledged to be brownfield in nature.
- 3.25. Looking into the matters considered, it sets out that it *“may be difficult to extend primary provision to accommodate housing levels beyond those set out in current local plan”*. It’s a strange response to the development of a site within what is probably the most sustainable location of Axminster, especially as the site is proposed to be promoted through and seeks to be allocated as part of the plan process. In any case, the site is modest in scale, would not have such an impact on education capacity in the wider area. It is also noted that this comment has been made against all Axminster sites which have been carried forward to allocation and therefore should not be considered sufficient reason to disregard the residential potential of this site.
- 3.26. There does not appear any overarching technical reason why this site should be retained as a retail site and not allocated for housing.
- 3.27. The reason given that the site not been allocated is as following;

The site is located within the proposed town centre and primary shopping area, where development should enhance the range and quality of town centre, shopping and leisure facilities. Redevelopment of the site for housing would be incompatible with this as it would result in the loss of a supermarket.

- 3.28. The fact is that the site is currently outside of the defined town centre boundary. As set out above the proposed town centre boundary has been drawn in a location which can no longer be considered appropriate given the evidence on the ground. This is covered in detail throughout these representations.
- 3.29. In addition to this, the foodstore at the site has already been lost, and was earmarked for loss when the Council undertook their Call for Sites. It seems strange that the Council is seeking to protect the site as a foodstore and extend the town centre boundary when the Council's own evidence confirms that there is a significant over supply of convenience goods floorspace such that existing stores were significantly underperforming.

4. East Devon Local Plan 2020–2042 – Second Regulation Draft

- 4.1. The 2024 National Planning Policy Framework states that Local Plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social, and environmental priorities; and a platform for local people to shape their surroundings.
- 4.2. Paragraph 16 goes onto state that plans should:
- a) be prepared with the objective of contributing to the achievement of sustainable development;
 - b) be prepared positively, in a way that is aspirational but deliverable;
 - c) be shaped by early, proportionate, and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
 - d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
 - e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
 - f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in the Framework, where relevant).
- 4.3. Paragraph 32 states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This section will assess the emerging Policies of the Local Plan against national policy, especially in relation to paragraph 32 and the evidence discussed further above. The NPPF also expects that the evidence should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.
- 4.4. Given the stage of the process of the Local Plan, paragraph 36 is relevant as this identifies that Local Plans will be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:
- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 4.5. The relevant policies and supporting text relating to town centres are covered further below.

Strategic Objectives.

- 4.6. Co-op is in general support of the strategic objectives, certainly promoting significant development within Axminster (element C).

Policy SPO2 – Levels of future housing Development

- 4.7. The plan period is set to 2020 to 2042. As the Council will be aware, the NPPF¹ states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery.
- 4.8. Given the stage of the Plan preparation and the anticipated lead in times for the potential submission, examination and adoption of the Plan, in order to ensure that the Plan covers the full 15 years on adoption, the Plan period may need be extended until least 2043. This needs to be monitored against the EDLP's progression through these stages.
- 4.9. This Policy sets out that provision will be made for at least 20,909 dwellings (net) to be delivered in the plan area between 1 April 2020 to 31 March 2042.

Policy SP3: Housing requirement by Designated Neighbourhood Area

- 4.10. Axminster was designated as a Neighbourhood Area in October 2013, however no Neighbourhood Plan has been prepared.
- 4.11. This strategic policy establishes minimum housing requirements for the 42 currently Designated Neighbourhood Areas (DNAs), including Axminster. The table within the Policy sets out the requirements, for which 1,391 dwellings (minimum) are proposed to be directed towards Axminster to 2042. It reads like no homes are projected to be delivered through emerging/future neighbourhood plans within Axminster.

¹ NPPF December 2024 Paragraph 22

- 4.12. It would be expected therefore that allocations capable of delivering the full needs of Axminster are identified through this Plan, not waiting for any future Neighbourhood Plan to progress to identify and facilitate this.

Policy SPO5: Development inside Settlement Boundaries

- 4.13. It is confirmed that *“Within the settlement boundaries defined on the Policies Map development will be supported in principle. This does not mean that all development will be acceptable within settlement boundaries: proposals will be considered on their own merits having regard to other policies in this plan and any made neighbourhood plan”*.
- 4.14. Co-op do not consider that the second sentence is necessary, as it simply confirms the legal requirements to consider all policies within the Plan. This element is not included within all policies, so why this specific policy?
- 4.15. In order to be sound, the second sentence needs to be removed from this Policy.

Policy SD02: Axminster and its development allocations

- 4.16. Para 5.4 sets out the approach to development in Axminster. It is noted that proposed residential allocations are identified, totalling 1,086 homes. Some sites are also small, with the smallest looking to deliver just 6 dwellings.
- 4.17. In light of this, Co-op object to the wording of this policy. The proposed allocations provide for up to 1,086 dwellings which appears to fall short of the minimum housing requirement in Axminster (1,391 in Policy SPO3). There is also insufficient detail within Appendix I of HOU-003 to support the decisions of the Council. Furthermore, this evidence and certainly the trajectory needs to be fully updated to support the upcoming Examination in Public to ensure that East Devon can demonstrate a 5 year housing land supply at the point of adoption and sufficient homes across the Plan Period.
- 4.18. Currently, it cannot be considered positively prepared, and it is not considered compliant with the NPPF in this regard.
- 4.19. In addition, it does not include the Co-op site for alternative uses, despite it being submitted as a residential opportunity in 2022 and it now includes the vacant former Co-op foodstore.
- 4.20. Included in those sites that are proposed to be allocated is Axmi_23 – Websters Garage which is allocated for 10 dwellings as part of an unspecified 'mixed use' development. No specific requirement is set out for the provision of retail or commercial floorspace despite the fact that the site is located in the heart of the proposed TCA and PSA.
- 4.21. At the time it was assessed, there was an undetermined application for the redevelopment of part of the site to provide a convenience store with 9 no. dwellings above (ref. 22/2322/OUT), however this application was never determined and the site has since been occupied by the relocated Co-op store following the approval of planning permission ref. 24/O157/FUL for alterations and extensions to the existing building.
- 4.22. It is considered, therefore, that the potential for the site to come forward for residential development is therefore limited. The Axminster Site Selection Report (SAL-005) does not

set out how it is intended to reconcile the conflict with the current proposed wording of Policy SEO6 to deliver dwellings on this site, nor is it apparent why a different approach has been taken in the consideration of this site to the Co-op site. For Axmi_23, the reasons for allocating note the site's proximity to services and facilities as a positive consideration which is markedly different to the approach taken in the consideration of Axmi_16 (the Co-op site).

- 4.23. To ensure that this policy is positively worded and complies with para 36 of the NPPF, the full development needs should be addressed, the trajectory fully updated which will likely require the identification of more residential sites in Axminster.
- 4.24. As part of this, given the evidence of the Council confirms there are no technical issues it is just the draft plan's change to the town centre boundary, the Co-op site needs to be formally identified as a residential allocation, capable of accommodating at least 10 dwellings (but could contribute 20, if an apartment scheme is taken forward) towards the minimum housing requirements to be delivered in Axminster.
- 4.25. Given the immediate availability of the site, this could be brought forward at an early stage in the Plan Period, making an important contribution to help to address the identified shortfall of approximately 300 dwellings in Axminster.
- 4.26. However, if it is decided not to allocate the site, then it should be removed from the Primary Shopping Area to ensure that there is the maximum flexibility in policy to allow the site to come forward for housing as an unallocated site in the event that this is determined to be its best option for redevelopment in the future.

Policy HNO4: Accessible and adaptable Housing

- 4.27. This policy requires at least 50% of residential schemes to be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations. There is no flexibility in this requirement.
- 4.28. The PPG identifies the type of evidence required to introduce a policy requiring the M4 standards, including the likely future need; the size, location, type, and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, and the ability to provide step-free access.
- 4.29. The evidence supporting the Plan (HOU-002) seems to support the minimum need for only 17% of dwelling to be adaptable in Figure 59 of the 2025 Housing Need Assessment.
- 4.30. Co-op therefore considers that the Council have not yet provided sufficient evidence for this policy to be considered justified or consistent with national policy.

Strategic Policy SEO6: Town centre hierarchy

- 4.31. This sets out the retail hierarchy, although the hierarchy is not within the main body of the Policy, but within the supporting text. Although not a point of soundness, it is recommended that the hierarchy in para 9.32 is moved into the policy itself for clarity.

- 4.32. The opening paragraph of the Policy sets out the overall strategy for the centres. A further point of clarity should be added, as per the underlining below, so it is consistent with the NPPF para 9Ob and its Annex which confirms the uses appropriate in town centres, as set out below:

Tier one and two towns form focal points of activity in East Devon towns and will be the preferred location for the development of new retail, leisure and other Town Centre uses that attract and are used by people for commercial or community activities.

- 4.33. The supporting text similarly needs to be updated, specifically para 9.31, as it confirms “*that the NPPF promotes competitive town centre environments and growth management*”, but this also needs to include the support for diversification, to be consistent with NPPF para 90a.
- 4.34. This also needs to be reflected in Para 9.33, as it is not only shops that are crucial to maintaining vitality and viability of centres, but all uses within the centre.
- 4.35. Finally, the fourth paragraph of the Policy and the sequential text within para 9.33 needs to be deleted, as these elements are covered in Policy SE07.

Policy SE07: Town centre development, sequential approach and impact assessment

- 4.36. Put simply, this policy needs some significant re-writing to be considered sound, as it is not consistent with Section 7 of the NPPF. It is not positively prepared, it is not justified and it will not be effective in supporting the vitality and viability of defined centres.
- 4.37. Town Centre Areas (TCA) and Primary Shopping Areas (PSA) are defined within the EDLP for the tier one and two towns. As set out earlier, Co-op have significant issues with the definition of the town centre area and the primary shopping area for Axminster. In and around the former Co-op, there are a large number of residential dwellings included within the defined PSA and TCA.
- 4.38. In essence the PSA, as drafted, does not define where retail development is concentrated (our emphasis). The TCA, as drafted, does not accurately define the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. This is a requirement to comply with the NPPF.
- 4.39. This is most obviously displayed within the Council’s 2022 survey of Axminster, in and around Church Street. There is only one shop in a circa 160m run and the other town centre use within the run is a surgery. Town centre uses are not the pre-dominant land use and retail uses are not concentrated here.
- 4.40. Given the passage of time between the surveys and the drafting of evidence (Ref:ECN-007), the Co-op store no longer trades from this location. In order to reflect the actual position on the ground, this area of the town centre needs to be removed from both the TCA and PSA. In order to accurately reflect the area reflected by town centre uses concentration of retail development and Co-op have provided our view on the extent of the this in the attached at Appendix 1.

- 4.41. The second paragraph of the Policy seeks to arbitrarily constrain the acceptable uses within centres, limiting those uses to retail and leisure. This is not compliant with the NPPF Annex 2 which defines main town centre uses. The Council should focus on supporting a wide range of town centre uses across the centre, to capture the benefits that flow from this such as street level activity, pedestrian movements, and vitality and viability improvements, as opposed to constraining main town centre uses within the defined centres. As such Co-op recommend that this second paragraph is amended as follows:

Proposals for **main town centre** development (as defined in the Annex to the NPPF) within the Town Centre Areas (and excepting Cranbrook which is subject to the policies of the Cranbrook Plan), as defined on the Policies Map, will be permitted. ~~where they improve the quality and/or broaden the range of retail and leisure facilities, enhance the role of the town centres as sustainable shopping and leisure destinations and strengthen their vitality and viability.~~

- 4.42. Within the second paragraph, the first sentence is broadly acceptable, subject to correctly defining the PSA.
- 4.43. The third sentence needs deleting, as this seeks to restrict residential uses within the PSA. This is relevant, as if the Council do not intend to correct the PSA to properly reflect the concentration of retail uses, this could constrain development. It is also a curious approach against a context where the Council are currently seeking to include many residential dwellings within the proposed PSA – most obviously and as raised before along Church Street.
- 4.44. This also feeds back to sentences two and three in the second paragraph which seeks protect the PSA for predominantly retail and leisure uses. Just on this point, Para 90f of the NPPF is relevant, which states that:

Planning policies should: recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

- 4.45. Therefore, there is no support in the NPPF for a more onerous 'test' for residential uses within centres. It is recommended that the middle sentences of the second paragraph are amended to state:

Development proposals for other town centre uses within the Primary Shopping Areas will only be permitted where the majority of the total ground floor units are facilitating retail or leisure uses. Unless it can be demonstrated that there is no longer a retail or leisure demand, other town centre uses (**including residential**) will not be permitted on the ground floor within the Primary Shopping Areas. ~~Unless it can be demonstrated that there is no demand for any town centre use residential uses will not be permitted on the ground floor within the Primary Shopping Areas.~~

- 4.46. Co-op note the need for a marketing exercise, with the detail enclosed within footer 78 on Pg 185. Co-op do not have any particular concerns on the requirements at this stage, but do reserve the right to make comments in due course.
- 4.47. In relation to the support text to the Policy, there will be a need to make various consequential changes including:

- Para 9.37 – supporting wider town centre uses in town centre locations and accepting residential uses can be acceptable;
- Para 9.39 – reflecting the NPPF's support for residential uses as appropriate in town centres

Policy DS02: Housing Density and Efficient use of Land

- 4.48. Co-op generally support the requirement to make the best use of land by maximising the number of homes and density of development. This is best achieved in highly sustainable locations, such as town centres.

Policy PBO5: Biodiversity Net Gain (BNG)

- 4.49. It is noted that this policy seeks a 20% net gain in biodiversity for major developments. Non-major developments are only expected to deliver the mandatory requirement of 10%.
- 4.50. The supporting text refers to ENV-025 – Nature Recovery Declaration (2023), but this does not provide any justification or evidence to pursue a 20% gain in BNG. It appears to address the need to prepare a Local Nature Recovery Strategy (LNRS), which reads to be a legal requirement of the Environment Act (2021).
- 4.51. PPG² states that *"Plan-makers should not seek a higher percentage than the stator objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified."*
- 4.52. Without any evidence to support the 20% position, this policy as worded does comply with NPPF para 36 as it is not positively prepared as it will place a significant burden on development which is not justified and is not aligned with wider legislation in the form of the Environment Act 2021.

Policy Strategic Policy PBO6: Local Nature Recovery Strategy (LNRS) and Nature Recovery Network (NRN)

- 4.53. This policy sets out a series of statements relating local nature recover and also BNG. Given the wording of Policy PBO5, PBO6 does not appear to be particularly effective, they should be deleted as a policy.
- 4.54. As set out above, Local Nature Recovery Strategies are a legal requirement from the Environment Act 2021. There is no need to repeat their requirements within the emerging Development Plan and the NPPF notes at para 201 that *"Planning decisions should assume that these regimes will operate effectively"*.

² Paragraph: 006 Reference ID: 74-006-20240214



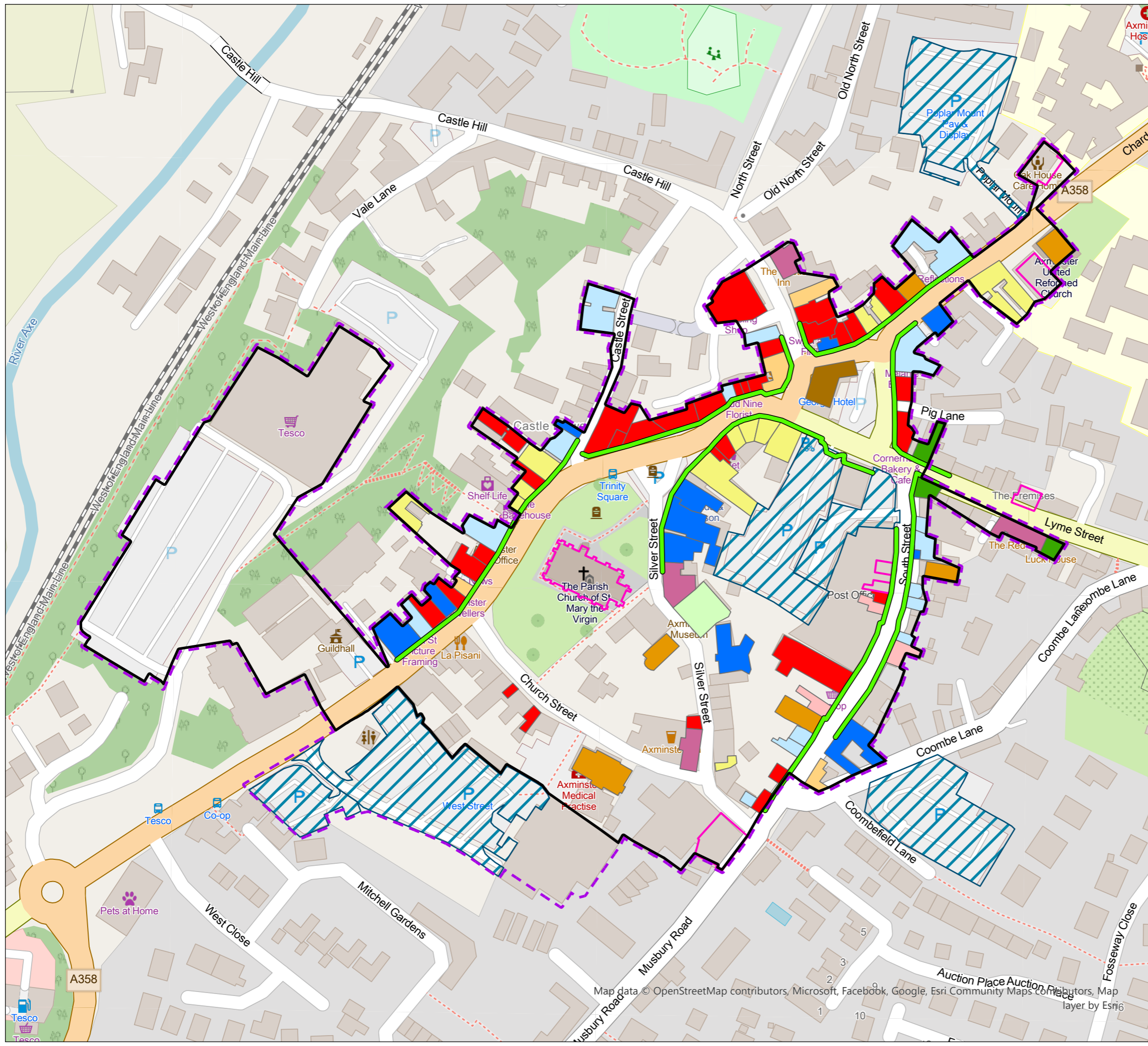
5. CONCLUSIONS

- 5.1. Pegasus Group have prepared this representation to the Submission Local Plan (Regulation 19) consultation (2025) on behalf of Co-op Estates.
- 5.2. Co-op welcome the production of the EDLP and wish to support the Council in its ongoing preparation.
- 5.3. Co-op have previously prepared representations to the East Devon Local Plan in relation to the site. The Council have been made aware that Co-op were considering the future of the store and have subsequently taken the decision to close the store in Axminster. In light of this, the evidence base is therefore not sufficient up to date to reflect this and the implications this would have.
- 5.4. Following this, the EDLP, as prepared, would not be considered sound. But it is the view of Co-op that modifications, as suggested in the representation above and updates to the evidence base could ensure a sound local plan can be delivered.
- 5.5. Co-op trust that the Council will find these comments useful as it continues to progress its Local Plan and would be happy to discuss these issues in greater detail in order to assist the Inspector and the Examination in Public
- 5.6. Co-op and Pegasus Group would also like to be kept informed of all forthcoming consultations on the Local Plan and any associated documents.



Appendix 1 – Suggested PSA and Town Centre Boundary

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- KEY**
- Suggested Town Centre Boundary
 - Council Proposed Town Centre Boundary
 - Primary Shopping Area
- Town Centre**
- Use**
- Overnight Accommodation
 - Shops
 - Charity Shops
 - Services
 - Professional and Financial Services
 - Restaurants and Cafes
 - Pubs
 - Takeaways
 - Leisure
 - Community / Health / Day Nurseries
 - Vacant Units
 - Other
 - EDDC Car Parks

REV	DATE	DESCRIPTION

TOWN CENTRE PLAN
AXMINSTER, EAST DEVON LOCAL PLAN REPS

THE CO-OPERATIVE

DATE	SCALE	DRAWN	APPROVED
26/01/2026	1:1700@A3	EN/EH	PR
SHEET	REV	N	O
-	A	▲	50M

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Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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