

Planning Policy Section (Local Plan Consultation)
East Devon District Council
Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

Our ref: SRS/508/12/1/Reg19(2)let

Date: 17th December 2025

Dear Sirs,

Re: East Devon Local Plan 2042 – 2nd Regulation 19 Consultation – Allocation GH/ED/80a: Land to the East of Axminster, Axminster, EX13 5PF

On behalf of The Crown Estate (TCE) we thank you for the opportunity to respond to this the 2nd Regulation 19 consultation for the East Devon Local Plan 2042.

TCE submitted duly made representations to the 1st Regulation 19 consultation at the beginning of 2025, with particular focus on its land interest, proposed allocation GH/ED/80a, part of Policy SD02 at Axminster.

TCE acknowledges the request to limit comments to the proposed changes that have been made to the Plan.

In reviewing the documentation for this 2nd Regulation 19 consultation, TCE is pleased to note that the allocation of its land under GH/ED/80a (SD02) remains as previously proposed and consequently, TCE remains supportive of the Plan in that regard. TCE acknowledges the additional reference in the policy to ensuring the integrity of the Beer Quarry & Caves SAC.

TCE has noted, however, that no revisions have been made to the policies and paragraphs that it made in its earlier 2025 representations. Consequently, TCE requests that its earlier representations (appended again for convenience and the avoidance of doubt) be carried forward, alongside this letter, to the Examination. TCE looks forward to having the opportunity to attend and speak at the Examination Hearing Sessions in due course.

Should you require anything further, please do not hesitate to contact the undersigned further.

Yours faithfully,

Sarah R Smith

[Sarah R Smith \(Dec 17, 2025 16:27:03 GMT\)](#)

Sarah R Smith

BA (Hons) MRTPI

Consultant - Town Planning

sarah.r.smith@rapleys.com

07787 527109

Encs. As Appendix - Representations to the 1st Regulation 19 consultation in February/March 2025

cc. Iona Cameron – The Crown Estate

Prestaller Farm, Axminster

East Devon Local Plan 2020-2042 Regulation 19
Consultation - Representations for The Crown Estate
31st March 2025
Our Ref: SRS/508/12/1/Reg19



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Quality Assurance

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2015.

We confirm that the undersigned is an appropriately qualified and experienced Chartered Planner experienced in the commercial property sector.

Created by: Sarah R Smith BA (Hons) MRTPI
Partner - Planning

Signature: *Sarah R Smith*
[Sarah R Smith \(Mar 28, 2025 10:04 GMT\)](#)

Checked by: Mike Orr MRTPI
Partner – Planning

Signature: *Mike Orr*
[Mike Orr \(Mar 28, 2025 10:12 GMT\)](#)

1 INTRODUCTION

1.1 These representations to the East Devon Local Plan 2042 Regulation 19 Consultation (February/March 2025) and relevant supporting documentation have been prepared by Rapleys LLP on behalf of The Crown Estate (TCE). Our representations are made in accordance with Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012.

The Crown Estate

1.2 The Crown Estate ('TCE') has a significant land interest at Axminster and Devon. TCE's wider landholding in the area also has the potential to deliver sustainable growth over the long term, and therefore TCE is submitting this land at Prestaller Farm for inclusion in the new emerging East Devon Local Plan for 225 homes and community facilities.

1.3 TCE is a national business with distinct attributes covering a diverse portfolio that stretches across England, Wales and Northern Ireland and they are one of the UK's largest landowners across land and the seabed with 200,000 acres of land and 12km of coastline. TCE seek to utilise this scale, the independent brand, investment and convening power to make a meaningful difference that creates lasting and shared prosperity for the nation, including making a positive environmental and social impact across their activity.

1.4 Across a portfolio of £15.8bn, TCE plan to help create thriving communities and renew urban centres that will support economic growth and productivity. They are working to be a leader in supporting the UK's path to net zero and stewarding the nation's natural environment and biodiversity. TCE is distinctly placed to invest and create positive and sustained impact.

1.5 By Act of Parliament, TCE is an independent commercial business with accountability to Parliament, and therefore it has the freedom to invest in places such as Axminster in the longer term. As a result, activities have generated £3bn in the last 10 years, all of which is returned to HM Treasury for the benefit of the nation.

1.6 The TCE purpose, is to create lasting and shared prosperity for the nation, and TCE is undertaking an ambitious strategy to:

- Be a leader in supporting the UK towards a net zero carbon and energy secure future;
- Help create thriving communities and renew town centres in London and across the UK;
- Take a leading role in stewarding the UK's natural environment and biodiversity; and
- Responsibly generate value and financial returns for the country.

1.7 TCE is committed to delivering sustainable and inclusive living, creating quality places that meet the needs of local people based on local knowledge and participation, embedding sustainability principles and pioneering new and sustainable approaches to housing through innovation to help local people and communities thrive.

1.8 The approach intends to deliver a positive legacy for both existing and new Axminster residents in the longer term. It includes delivering early enhancements to local biodiversity, positive social impact and value, open spaces and community infrastructure to create a sustainable community and help secure a successful future for Axminster.

1.9 A copy of the TCE Annual Report can be found here:
<https://www.thecrownestate.co.uk/about-us/annual-report>

Prestaller Farm, Beavor Lane (GH/ED/80a)

1.10 TCE own all of the allocation site identified in policy SD02 as GH/ED80a Prestaller Farm, Beavor Lane for 225 dwellings and a community hub for workspace, café/shop and meeting space. A site location plan and map showing the extent of TCE's ownership in this area are enclosed as Appendix 1 and 2.

1.11 The proposed allocation site in the emerging plan 2020-2042 is part of the existing East of Axminster allocation Policy 20 of the adopted East Devon Local Plan 2028 for circa 650 dwellings

and associated facilities, including the Axminster relief road. A hybrid planning application was submitted by TCE in April 2018 for the development of the TCE land within the allocation based on the principles of the Strategic Masterplan – this previous application remains undetermined to date principally as a result of issues of viability, funding of the relief road and nutrient neutrality.

1.12 More recently, the site was promoted and identified within the Regulation 18 Local Plan as a potential allocation for circa 225 dwellings as part of Site LP-GH/ED/70 and 80a within Strategic Policy 19. A Vision document was submitted in support of these earlier representations and is attached to these Regulation 19 representations as Appendix 3.

1.13 TCE welcomes the opportunity to participate in this Regulation 19 consultation and support the proposed allocation for the land at Beavor Lane. TCE will work with the Council, local community stakeholders and the neighbouring landowners, Persimmon Homes to successfully bring forward the land for much needed sustainable new homes and community spaces in Axminster.

2 PLANNING POLICY CONTEXT

2.1 These representations have regard to the relevant plan-making paragraphs within the NPPF (2023) and their consistency with the principles and policies set out. In particular:

- Paragraph 15 identifying that the planning system should be genuinely plan-led, and at paragraph 11 that strategic policies should as a minimum provide for objectively assessed needs for housing
- Paragraph 16 identifies the strategic priorities for Councils including the delivery of homes and jobs, that plans should be aspirational, shaped by effective early engagement, contain clear policies and no duplication of policies,
- Paragraph 22 notes plans should cover periods at least 15 years from adoption,
- Paragraph 24 emphasises the importance of planning strategically across administrative boundaries with a duty to cooperate on planning issues (effective cooperation) particularly relating to housing delivery.
- Paragraph 36 sets out the Test of Soundness.

2.2 This Representation considers the Plan as published against these tests, namely whether it will be:

(i) Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

(ii) Justified – the plan should be the most appropriate strategy, when considered against reasonable alternative, based on proportionate evidence;

(iii) Effective – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and

(iv) Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

3 VISION AND OBJECTIVES

3.1 TCE supports the principles of the Local Plan Vision set out in paragraphs 2.1-2.10 and its objectives as identified in Table 1 in the Plan. They are all reasonable and are in accordance with the principles of the NPPF (2023) and achieving sustainable development.

4 SPATIAL STRATEGY – POLICIES SP01, SP02 AND SP04

4.1 TCE supports the principles of the spatial strategy as set out in **SP01**, focussing development on the western side of the district (54%) whilst at the same time promoting an appropriate level of development at the 'main centres' (Tier 2 in the hierarchy) throughout the District (30%), including Axminster, and allowing limited development to meet local needs at 'service villages'/local centres and in the countryside (16%). The spatial strategy is not overly reliant on a single source of

delivery, providing flexibility for the market. This is consistent with the NPPF (2023) and the principles of sustainable development and is supported.

- 4.2 Local planning authorities are required to have a clear understanding of the housing need in their area, by preparing a Strategic Housing Market Assessment (SHMA). The EDDC Plan can be prepared under the December 2023 version of the NPPF by reference to paragraphs 234-236 of the NPPF 2024. This is because this Regulation 19 Plan was published prior to 12 March 2025 and its housing requirement meets at least 80% of local need (calculated using the standard method in the NPPF, December 2024).
- 4.3 The Standard Method requires EDDC to provide circa 1,188 dwellings per annum. The Plan proposes (Policy SP02) at least 20,909 over the 22-year plan period which represents 80% of the requirement – in this context, the Plan is considered to be justified. TCE supports the principles of **Policy SP02** in providing at least 20,909 dwellings over the plan period.
- 4.4 The development of a spatial strategy is a vital component of a Local Plan. Achieving more genuinely sustainable development in delivering growth is a key policy thrust of the East Devon Plan. The evidence base behind the Local Plan, including the Sustainability Appraisal, indicates consideration to varying development strategies prior to selecting the chosen option that appears in the Regulation 19 version.
- 4.5 In this context, TCE supports the spatial strategy and level of housing proposed within the plan, which is considered to be justified and effective and consistent with national policy.
- 4.6 TCE supports the general principles of the economic vision set out in paragraphs 3.20 – 3.24. Paragraph 3.29 notes that employment in Tier 1-4 settlements aims to meet local needs and improve self-containment – TCE supports this aim. The Plan goes on to say that new jobs will be required alongside new housing on larger development allocations – in the context of Axminster, the **Policy SP04** then allocates 1ha of E(g)(iii) to site GH/ED/80a, where (iii) is industrial use (which can be carried out in any residential area without causing detriment to the amenity of the area). Whilst TCE supports the principle behind the allocation, the reference to E(g)(iii) in Policy SP04 is at odds with the actual wording and requirement within SD02 - GH/ED/80a, which requires a community hub incorporating workspace, café/shop meeting space. TCE would prefer to see the reference in **Policy SP04** revised to reflect the requirement within SD02 - GH/ED/80a which reflects the Vision that TCE has for the development of the site – a wider E class definition would be more appropriate than the E(g) restriction.

5 AXMINSTER/SITE-SPECIFIC POLICY SD02 (GH/ED/80A)

- 5.1 Within this policy, land at Prestaller Farm, GH/ED/80a is allocated for 225 dwellings and a community hub which should provide opportunities for workspace, café/shop and meeting space. Access is required to be via Axmi_22 (land east of Lyme Road) to the south and there is a reciprocal provision within the Axmi_22 allocation as well. TCE supports the principle of the GH/ED/80a allocation, and the amount and use of development identified within the policy.
- 5.2 The policy also requires the incorporation of a site access road to a standard and location to enable potential future extension for a relief road link to Chard Road to the north. TCE acknowledges the desire for this, subject to viability considerations.
- 5.3 The policy also acknowledges the remainder of the land under TCE control that lies to the north of the Mill Brook but outside the allocation, noting that where necessary to meet the demands and needs of the development, part of it can be used for off-site open space provision and habitat/BNG mitigation purposes. This is welcomed and supported by TCE. A Vision Document provided in Appendix 3 provides more detail as to how the adjacent land owned by TCE could be developed for the benefit of Axminster achieving both sustainable development and increasing biodiversity as well as more opportunities for public open space.

6 OTHER POLICIES

6.1 **Strategic Policy OL01 – Landscape Features** – requires that development ‘would not harm’ the distinctive landscape. TCE supports a landscape led approach to master planning of its strategic development sites but is concerned that this policy is currently expressed as an absolute position and would ideally like to see further clarification as to what landscape design and mitigation would be acceptable within the Landscape Visual Impact Appraisal to be submitted as part of development applications. TCE note that the proposed allocation at Prestaller Farm, Axminster is outside of the protected national landscapes identified in Figure 14 of the Regulation 19 consultation draft plan.

6.2 The following policy revision is suggested –

East Devon Local Plan Landscape Mitigation Policy

1. Purpose and Scope

This policy ensures that all developments within East Devon safeguard and enhance the district's unique landscape character, biodiversity, and visual amenity, particularly in National Landscape Character Areas (previously Areas of Outstanding Natural Beauty AONBs). It applies to all new developments with potential landscape impacts.

2. Policy Principles

- a. **Landscape Character Preservation:** *Proposals must respect the East Devon Landscape Character Assessment and integrate harmoniously with the area's natural and built features.*
- b. **Mitigation Hierarchy:** *Developers must follow the mitigation hierarchy—avoidance, minimization, restoration, and offsetting—to address potential landscape impacts.*
- c. **Biodiversity Enhancement:** *Developments should aim for a net gain in biodiversity within or adjacent to the development area, aligning with the Environment Act 2021 and East Devon's Green Infrastructure Strategy.*
- d. **AONB Protection:** *Proposals within or near National Landscape Character areas, must demonstrate minimal harm to the area's special qualities.*

3. Assessment and Requirements

- a. **Landscape Impact Assessment:** *Applications must include a Landscape and Visual Impact Assessment (LVIA) that identifies potential impacts and mitigation measures.*
- b. **Mitigation Plans:** *Developers must submit detailed plans outlining how landscape impacts will be mitigated, including:*
 - **Planting Schemes:** *Use of native species to enhance ecological value and provide screening.*
 - **Topographical Adjustments:** *Measures to harmonize the development with the natural landform.*
 - **Green Infrastructure:** *Integration of features such as woodlands, watercourses as well as green roofs, living walls, and tree-lined corridors.*
 - **Ongoing Management:** *Proposals for the long-term maintenance and monitoring of landscape features.*

4. Design Standards

- a. *Developments must adopt sustainable design principles, prioritising materials and colours that blend with the East Devon landscape.*

5. Community Engagement

Developers are required to engage with local communities and stakeholders at an early stage to identify landscape concerns and incorporate feedback into their proposals.

6. Monitoring and Enforcement

- a. *East Devon District Council will monitor approved developments to ensure compliance with submitted mitigation plans.
Non-compliance will result in enforcement actions.*

7 CONCLUSIONS

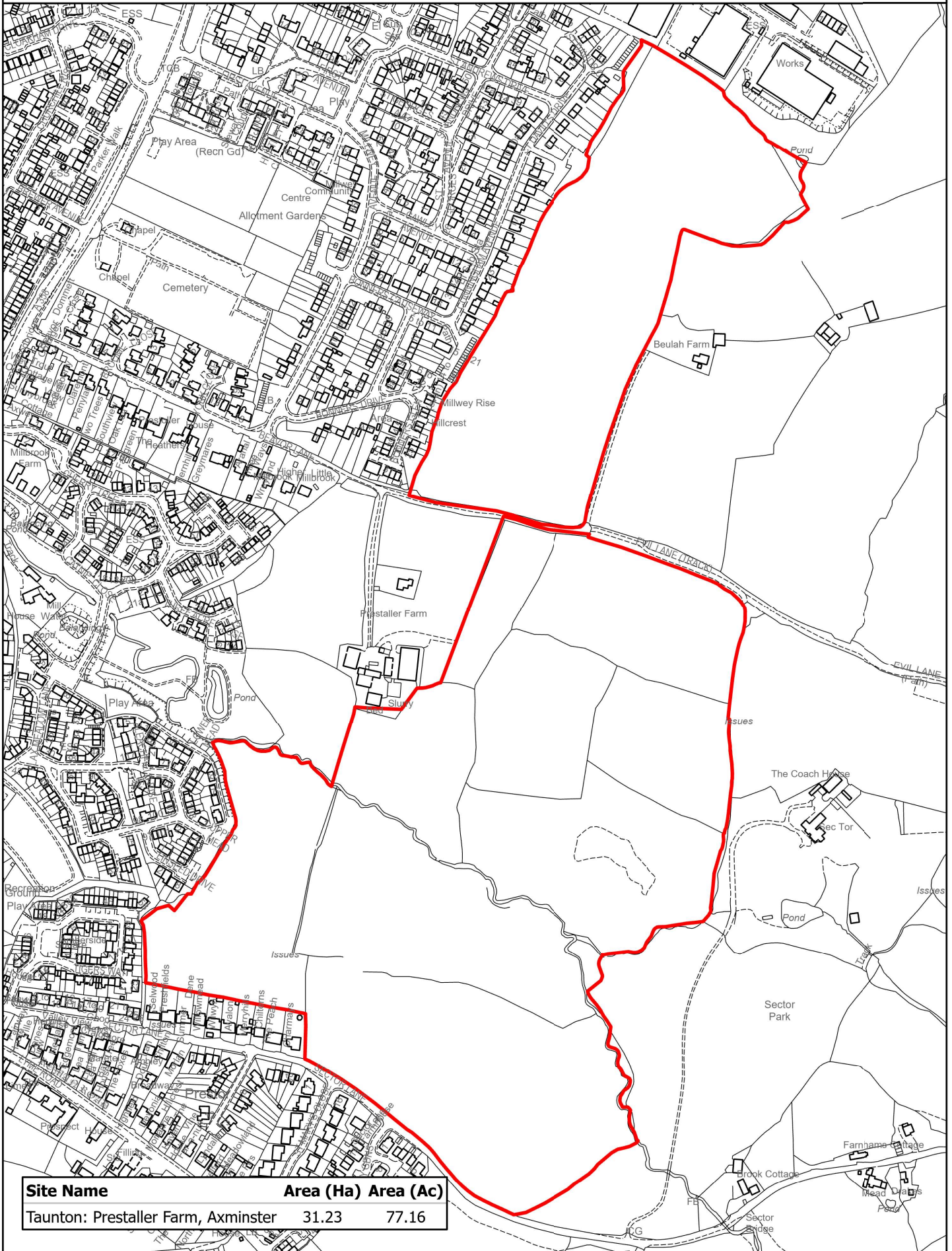
- 7.1 TCE specifically supports the Allocation Site SD02 - GH/ED/80a for the development of a residential extension to Axminster which will help provide much needed sustainable new homes in Axminster.
- 7.2 The spatial strategy and general vision for the Plan, specifically in relation to policies SP01 and SP02 is supported, but Policy wording of SP04 is not consistent with the site-specific allocation policy and therefore SP04 should be amended to reflect SD02 - GH/ED/80a.
- 7.3 At the appropriate time, TCE would be pleased to participate at the next stage of the Local Plan preparation and at Examination and would welcome an early opportunity to engage with the Council and local community stakeholders to further develop its vision for the site allocation.

Site Allocation Location Plan



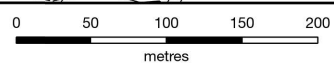
Taunton: Prestaller Farm, Axminster

Devon



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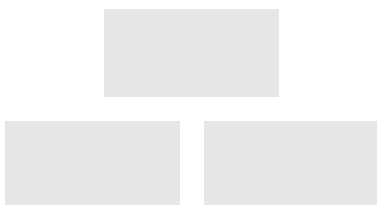
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Date: 10/11/2023
 Property Ref: N/A

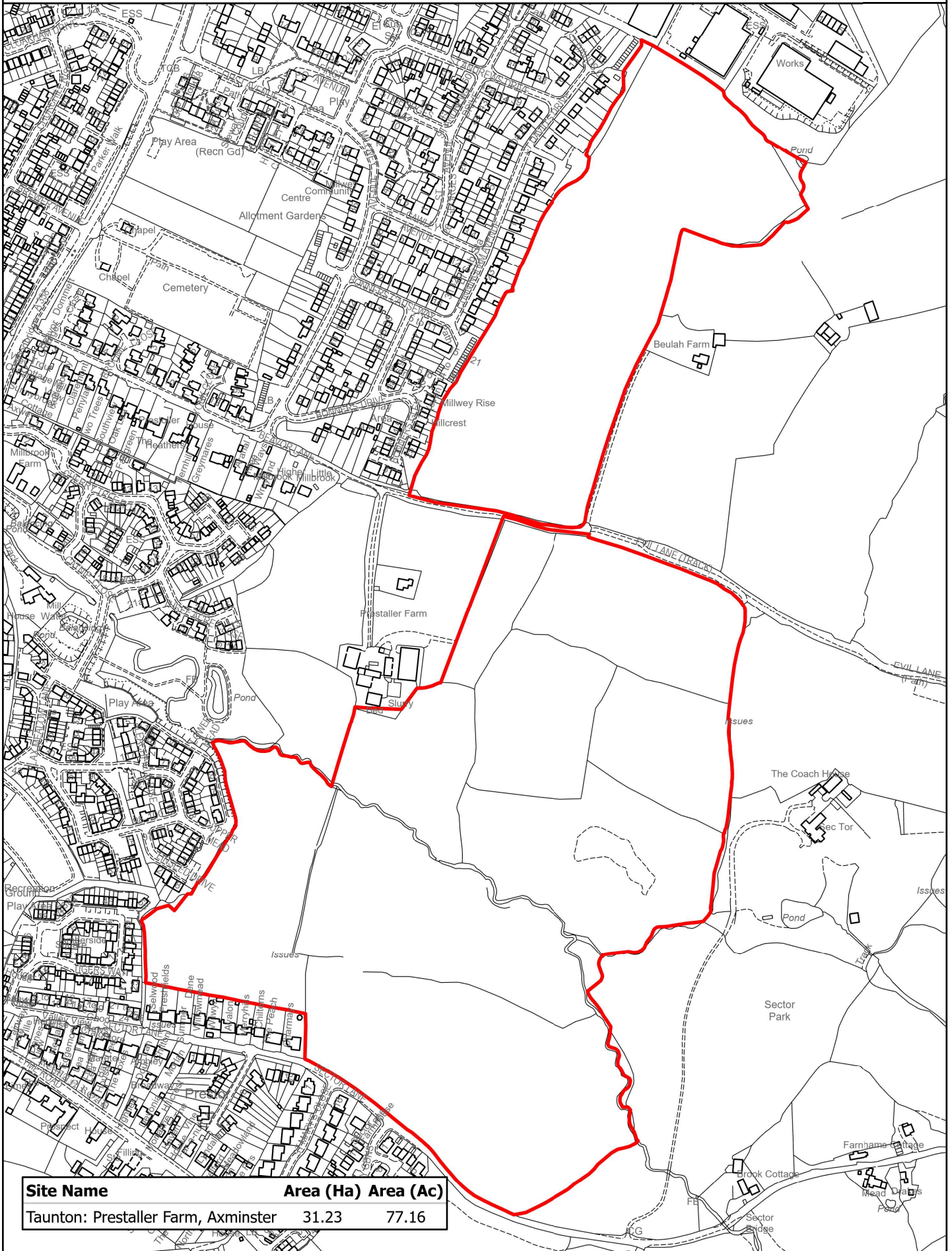
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Plan of The Crown Estate Landholding



Taunton: Prestaller Farm, Axminster

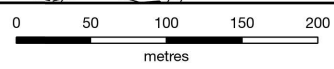
Devon



Site Name	Area (Ha)	Area (Ac)
Taunton: Prestaller Farm, Axminster	31.23	77.16

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 Author: CP QA: SS

1:5,000 @ A4



Date: 10/11/2023
 Property Ref: N/A

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Forms





East Devon Local Plan
Publication Stage (Regulation 19)
Representation Form

Ref:

**(For official
use only)**

Name of the Local Plan to which this representation relates: East Devon Local Plan 2020-2042

Please return to East Devon District Council, Local Plans Team, Blackdown House, Border Road, Honiton, EX14 1EJ, upload onto our consultation portal at <https://eastdevonlocalplanreg19.commonplace.is> or email to localplan@eastdevon.gov.uk by **31 March 2025**

This form has two parts:

Part A – Personal Details: Needs to be completed only once.

Part B – Your representation(s): Please fill in a separate sheet for each representation you wish to make.

Part A: Personal details

1. Personal details

Full name

Mrs Sarah R smith of Rapleys LLP

Are you acting as an agent for another party?

Yes

Organisation (where relevant)

The Crown Estate

Address line 1

120 Colmore Row

Address line 2

Address line 3

BIRMINGHAM

Postcode

B3 3AP

Email address

sarah.r.smith@rapleys.com

Part B – Representation

Please use a separate sheet for each representation

2. To which part of the East Devon Local Plan does this representation relate? Please write down the paragraph or policy number that your representation relates to.

Paragraph

Policy

OL01

Policies
Map

3. Do you consider that this part of the East Devon Local Plan is legally compliant?

Yes

No

3 (a). If yes, and you wish to support the legal compliance of this part of the East Devon Local Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

3 (b). If no, please give details of why you consider this part of the East Devon Local Plan is not legally compliant. Please be as precise as possible.

(Continue on a separate sheet if necessary)

3 (c). Please set out the modification(s) you consider necessary to make this part of the East Devon Local Plan legally compliant, in respect of any legal compliance matters you have identified at 4(b) above. You will need to say why each modification will make this part of the East Devon Local Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

4. Do you consider that this part of the East Devon Local Plan is Sound?

Yes

No

4 (a). If yes, and you wish to support the soundness of this part of the East Devon Local Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

4 (b). If no, please give details of why you consider this part of the East Devon Local Plan is unsound. Please be as precise as possible.

(Continue on a separate sheet if necessary)

4 (c). Please set out the modification(s) you consider necessary to make this part of the East Devon Local Plan sound, in respect of any soundness matters you have identified at 5(b) above. You will need to say why each modification will make this part of the East Devon Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

5. Do you consider that this part of the East Devon Local Plan complies with the Duty to Co-operate?

Yes

No

5 (a). If yes, and you wish to support this part of the East Devon Local Plan's compliance with the duty to co-operate, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

5 (b). If no, please give details of why you consider this part of the East Devon Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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8. If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.

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Paragraph

Policy

Policies Map

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Paragraph

Policy

OL01

Policies
Map

3. Do you consider that this part of the East Devon Local Plan is legally compliant?

Yes

No

3 (a). If yes, and you wish to support the legal compliance of this part of the East Devon Local Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

3 (b). If no, please give details of why you consider this part of the East Devon Local Plan is not legally compliant. Please be as precise as possible.

(Continue on a separate sheet if necessary)

3 (c). Please set out the modification(s) you consider necessary to make this part of the East Devon Local Plan legally compliant, in respect of any legal compliance matters you have identified at 4(b) above. You will need to say why each modification will make this part of the East Devon Local Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

4. Do you consider that this part of the East Devon Local Plan is Sound?

Yes

No

4 (a). If yes, and you wish to support the soundness of this part of the East Devon Local Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

4 (b). If no, please give details of why you consider this part of the East Devon Local Plan is unsound. Please be as precise as possible.

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4 (c). Please set out the modification(s) you consider necessary to make this part of the East Devon Local Plan sound, in respect of any soundness matters you have identified at 5(b) above. You will need to say why each modification will make this part of the East Devon Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

5. Do you consider that this part of the East Devon Local Plan complies with the Duty to Co-operate?

Yes

No

5 (a). If yes, and you wish to support this part of the East Devon Local Plan's compliance with the duty to co-operate, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

5 (b). If no, please give details of why you consider this part of the East Devon Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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8. If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.

(Continue on a separate sheet if necessary)

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East Devon Local Plan
Publication Stage (Regulation 19)
Representation Form

Ref:

**(For official
use only)**

Name of the Local Plan to which this representation relates: East Devon Local Plan 2020-2042

Please return to East Devon District Council, Local Plans Team, Blackdown House, Border Road, Honiton, EX14 1EJ, upload onto our consultation portal at <https://eastdevonlocalplanreg19.commonplace.is> or email to localplan@eastdevon.gov.uk by **31 March 2025**

This form has two parts:

Part A – Personal Details: Needs to be completed only once.

Part B – Your representation(s): Please fill in a separate sheet for each representation you wish to make.

Part A: Personal details

1. Personal details

Full name

Mrs Sarah R smith of Rapleys LLP

Are you acting as an agent for another party?

Yes

Organisation (where relevant)

The Crown Estate

Address line 1

120 Colmore Row

Address line 2

Address line 3

BIRMINGHAM

Postcode

B3 3AP

Email address

sarah.r.smith@rapleys.com

Part B – Representation

Please use a separate sheet for each representation

2. To which part of the East Devon Local Plan does this representation relate? Please write down the paragraph or policy number that your representation relates to.

Paragraph

Policy

Policies
Map

3. Do you consider that this part of the East Devon Local Plan is legally compliant?

Yes

No

3 (a). If yes, and you wish to support the legal compliance of this part of the East Devon Local Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

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(Continue on a separate sheet if necessary)

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Yes

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(Continue on a separate sheet if necessary)

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(Continue on a separate sheet if necessary)

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Yes

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(Continue on a separate sheet if necessary)

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Paragraph

Policy

OL01

Policies
Map

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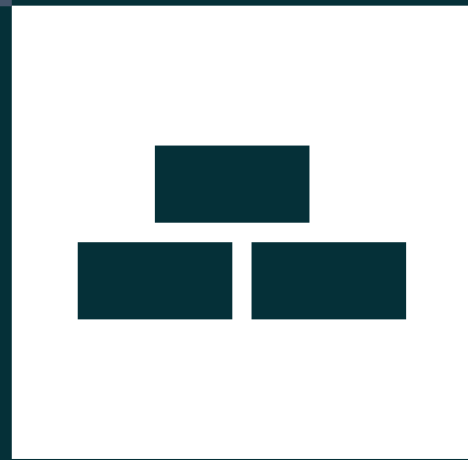
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For further details contact:

Sarah R Smith

07787 527109

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126 Colmore Row Birmingham B3
3AP

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