
Stage 1 Desktop Planning Strategy Report

Tier 1 – Desktop intelligence

Land to the north of Corefields, Sidford, Sidmouth, EX10 9SG

Client: **Sample Client**
Reference: 999-DEMO-2026 -PFCO-REP-PlanningAdvisor-R01
Date: 10 May 2026
Revision: R01

1 Executive Summary

VERDICT

Executive Verdict: PAUSE — Tier 2 route testing required before detailed design, submission or significant consultant spend — 9-dwelling site-led route is desktop-supportable but blocked by the major-development test for the East Devon National Landscape (NPPF Chapter 15 — see LVIA for the specific paragraph anchor); do not progress to full design or submission until Tier-2 strategic options + LPA pre-app confirm a defensible route. TIER-1 DESKTOP REPORT — LIMITATION & SCOPE NOTICE: This Tier-1 desktop report is suitable for early client-side decision-making and consultant briefing. It is NOT a formal submission document and must be verified or replaced by the relevant qualified specialist report where required by the LPA or statutory consultees. The overall pack recommendation set out in the cover letter is the controlling instruction; this report is one input within that recommendation. Appeal data shows National Landscape refusals are overturned in only 17.5% of cases, underlining the weight of this duty. Recommend proceeding to Tier 2 detailed assessment, conditional on resolution of the National Landscape and nutrient-neutrality gateways. The site lies within a Natural England SSSI Impact Risk Zone. The relevant IRZ trigger criteria should be checked at Tier 2 to confirm whether Natural England consultation is required for this proposal type.

Report	Planning Strategy Advisory Report
Site	Land to the north of Corefields, Sidford, Sidmouth, EX10 9SG
Client	Sample Client
Issue date	10 May 2026

Detail follows in this report. Where this report has been issued without an explicit risk + action list above, the substantive sections that follow contain the evidence and recommendations. For a one-page strategic summary, refer to the Client Decision Pack.

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2 How to Read This Report

This section explains how the report is structured, how risk ratings are presented, and what action you should take based on the findings.

2.1 Reading Order

We recommend the following reading order:

1. **Executive Summary.** A one-page overview of the key findings and overall risk rating. Start here if you are short on time.
2. **Main body sections.** Detailed analysis of each topic area, presented in a logical sequence from site context through to recommendations.
3. **Recommendations.** Specific actions required before, during, or after the planning process.
4. **Limitations and Disclaimers.** Important caveats on the scope of the assessment and the conditions under which the findings are valid.

2.2 Report Structure

Every technical section of this report follows a consistent structure:

- **Context.** What the section covers and why it matters to the development proposal.
- **Data and Evidence.** The factual information drawn from public datasets, authoritative public data sources, and client-supplied information.
- **Analysis.** Our professional assessment of what the data means for the site.
- **Risk Rating.** A traffic-light classification (where applicable) summarising the level of concern.
- **Recommendation.** What action, if any, is required.

2.3 Traffic-Light Key

Risk ratings throughout this report use a three-colour system:

LOW	Low risk. No significant constraint identified. Standard design measures are sufficient. No specialist investigation is likely to be required.
MEDIUM	Moderate risk. A constraint or data gap has been identified that requires attention. Further investigation, a design response, or a planning condition may be needed.
HIGH	High risk. A significant constraint or issue has been identified. Specialist investigation, a specific design solution, or early engagement with the relevant statutory body is strongly recommended before submission.

2.4 What to Do Next

1. Review the Executive Summary for an overview of all findings.
2. Focus on any items rated **MEDIUM** or **HIGH**; these require action before or during the planning process.
3. Check the **Recommendations** section for a prioritised list of next steps.
4. Review the **Update Triggers** section to understand when this report should be refreshed.
5. Contact Site Intelligence if you have questions about any finding or wish to commission follow-up specialist work.

Limitations of Liability

This report has been prepared for the sole and confidential use of **Sample Client** ("the Client") in connection with strategic planning advice in connection with the proposed development at Land to the north of Corefields, Sidford, Sidmouth, EX10 9SG. It may not be relied upon by any other party, or for any other purpose, without the express prior written consent of PF & Co Holdings Ltd (trading as Site Intelligence).

We accept no duty of care or liability to any party other than the Client. Any other party who chooses to rely on this report (or any part of it) does so entirely at their own risk.

The total liability of PF & Co Holdings Ltd in connection with this report and the services provided shall be limited to **professional indemnity insurance with a £1,000,000 limit per claim; total contractual liability capped at three times the fee paid for the relevant Report (Business Terms and Conditions clause 17.2)**. This limitation applies to any and all claims arising from or in connection with our instruction, whether in contract, tort (including negligence), for breach of statutory duty, or otherwise.

Scope of Instruction

This report provides strategic planning advice on the matters set out in our agreed instructions. To preserve professional defensibility, we have explicitly **not** been instructed to provide, and this report does not constitute, advice on the following specialist disciplines:

- **Highways capacity and traffic impact.** The Client should commission Transport Statement / Transport Assessment by a chartered traffic engineer.
- **Quantitative flood-risk modelling.** The Client should commission Flood Risk Assessment to NPPF and PPG standards by a chartered flood engineer.
- **Survey-grade ecology.** The Client should commission Preliminary Ecological Appraisal or Ecological Impact Assessment by a CIEEM-registered ecologist.
- **Quantitative contamination assessment.** The Client should commission Phase 1 / Phase 2 Geo-environmental investigation by a chartered environmental consultant.
- **Formal legal opinion on the interpretation of statute, case law, or contracts.** The Client should commission instructed solicitor or counsel.
- **RICS Red Book valuation or hope-value advice.** The Client should commission RICS-registered valuer.

Conflicts of Interest — RTPI Disclosure

In accordance with the RTPI Code of Professional Conduct (1 February 2023) and Conflicts of Interest Guidance Note 2 (October 2024), we have undertaken a conflict of interest check in relation to this instruction. We have identified no conflicts that would prevent us from providing impartial and objective advice. PF & Co Holdings Ltd, trading as Site Intelligence, advises planning applicants only and does not provide strategic planning advice to local planning authorities.

Desktop Intelligence: Planning

This planning assessment presents desktop intelligence compiled from authoritative public data sources available at the date of review. This assessment is not formal planning advice as defined by the Royal Town Planning Institute (RTPI) Code of Professional Conduct. It is based on the adopted local plan, the NPPF (December 2024), Planning Practice Guidance, published LPA monitoring data, and analysis of relevant appeal decisions. It is subject to the data gaps, assumptions and limitations stated in this report.

Site Intelligence is prepared to have this assessment reviewed and verified by a suitably qualified town planner. For formal planning submission, this assessment should be verified by a Member of the Royal Town Planning Institute (MRTPI). This represents the desktop strategy stage of a staged delivery process; specialist sign-off should follow before submission.

Client Decision Panel

Eight-question front-loaded summary. Answers the questions a client asks before reading the body of the report. Strategic decision-support only — not a substitute for MRTPI advice, LVIA, ecology, transport, drainage, legal title or RICS valuation (see Scope of Instruction).

CURRENT BRIEF

Supportable

APPLICATION ROUTE

Complex

MAIN OPPORTUNITY	Severe Five-Year Housing Land Supply shortfall (2.97 years) — tilted balance engaged under NPPF Dec 2024 paragraph 11(d) in favour of granting permission.
MAIN RISK	Site within East Devon National Landscape (formerly AONB, designated 1963). NPPF protected-landscape policy applies. Great weight must be given to conserving and enhancing landscape and scenic beauty. If the proposal is treated as major development in this context, the major-development / exceptional-circumstances test will need to be addressed.
BEST ROUTE	Pre-app + landscape-led full application
DO NOT SUBMIT WITHOUT	<ul style="list-style-type: none"> • Landscape and Visual Impact Assessment (LVIA) by a CMLI-registered landscape architect • Habitats Regulations Assessment and a nutrient-neutrality solution (credits, on-site mitigation or wetland) • Ecological survey programme (Preliminary Ecological Appraisal at minimum) by a CIEEM-registered ecologist • Heritage Statement (and Heritage Impact Assessment for direct-impact assets) addressing setting and statutory duties • Geotechnical desk-study and intrusive ground investigation addressing slope stability and ground risk • Transport Statement or Transport Assessment by a chartered traffic engineer • Pre-development enquiries with the water company and DNO covering capacity and connection programme • Arboricultural Impact Assessment to BS 5837:2012 by a qualified arboriculturist
RECOMMENDED NEXT SPEND	<ul style="list-style-type: none"> • Landscape and Visual Impact Assessment (LVIA) by a CMLI-registered landscape architect • Habitats Regulations Assessment and a nutrient-neutrality solution (credits, on-site mitigation or wetland) • Ecological survey programme (Preliminary Ecological Appraisal at minimum) by a CIEEM-registered ecologist
OVERALL ADVICE	Redesign / test layout before submission

WHY

The site is not a no-go, but the current 15-dwelling concept should be tested against National Landscape (AONB) and Nutrient neutrality before committing to a full application.

Decision panel derived deterministically from screened constraints, Five-Year Housing Land Supply, designated-site proximities and tier. Reviewers should read the supporting Sections 2 to 11 before relying on the verdict above.

3 Executive Summary

Executive Verdict: PAUSE — Tier 2 route testing required before detailed design, submission or significant consultant spend — 9-dwelling site-led route is desktop-supportable but blocked by the major-development test for the East Devon National Landscape (NPPF Chapter 15 — see LVIA for the specific paragraph anchor); do not progress to full design or submission until Tier-2 strategic options + LPA pre-app confirm a defensible route. TIER-1 DESKTOP REPORT — LIMITATION & SCOPE NOTICE: This Tier-1 desktop report is suitable for early client-side decision-making and consultant briefing. It is NOT a formal submission document and must be verified or replaced by the relevant qualified specialist report where required by the LPA or statutory consultees. The overall pack recommendation set out in the cover letter is the controlling instruction; this report is one input within that recommendation. Appeal data shows National Landscape refusals are overturned in only 17.5% of cases, underlining the weight of this duty. Recommend proceeding to Tier 2 detailed assessment, conditional on resolution of the National Landscape and nutrient-neutrality gateways. The site lies within a Natural England SSSI Impact Risk Zone. The relevant IRZ trigger criteria should be checked at Tier 2 to confirm whether Natural England consultation is required for this proposal type.

PROPOSED UNITS 15	GREEN BELT No	HERITAGE Affected
HLS 2.97 years		

4 Site & Constraints

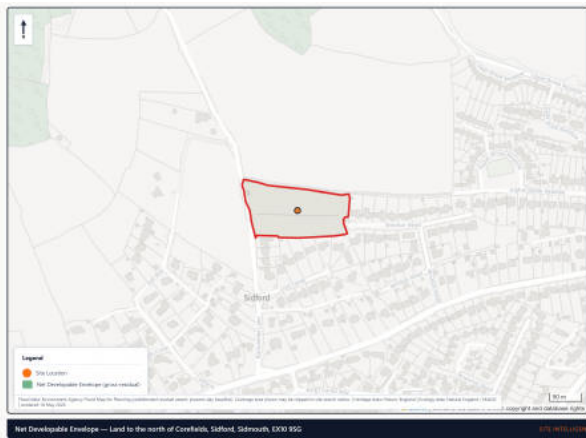
Site Address	Land to the north of Corefields, Sidford, Sidmouth, EX10 9SG
Postcode	EX10 9SG
Local Planning Authority	East Devon District Council
Proposal	Residential development for up to 15 dwellings
Proposed Units	15
Settlement Boundary	To be confirmed (Small town — within built-up area fringe)

4.1 Key Constraints

Constraint	Status
Conservation Area	NO
Green Belt	NO
Listed Building	NO
National Landscape	YES
Flood Zone	ZONE 1

Net Developable Envelope

Gross-residual basis · RICS Land Measurement (2021) §3.4



Map 1: Net Developable Envelope map — exclusions overlay over site boundary

Exclusion class	Hectares	Anchor
Gross site area	1.0881 ha	
Gross-residual area before Tier 2 exclusions	1.0881ha (gross)	No statutory exclusion classes engaged at desktop; verify access, levels, drainage, ecology, title and trees at Tier 2 before assuming net = gross.

This is not a confirmed net developable area. No design, access, drainage, ecology, levels, arboricultural or title exclusions have been deducted at Tier 1.

Scalar cross-check (reconciles against envelope above)

Indicative deductions per engaged constraint, applied to the gross site area. Percentages reflect typical setback and buffer requirements; site- specific spatial analysis is required for design-stage figures.

Constraint deduction	Indicative %	Before	After
Gross site area	—	1.08 ha	1.08 ha
AONB sensitive design margin	-10%	1.08 ha	0.97 ha
Indicative net developable area	90%	1.08 ha	0.97 ha

Heuristic deductions only — derived from typical practitioner setbacks (Natural England 15m ancient woodland; BS 5837 RPA; SuDS buffer). Spatial analysis from site polygon and constraint shapefiles is the design-stage step (Phase 3 work-stream).

5 Title and Planning History

5.1 Title and Tenure

Title register not commissioned for this report. The Land Registry Title Register and Title Plan are paid documents (£7 each at HMLR; updated 2026-06-01 per HMLR fee rise) and sit outside the standard desktop screening. We recommend obtaining the Official Copy of the Title Register and Title Plan before submission to verify ownership, extent, and any restrictive covenants, options or overage that could affect deliverability.

5.2 Recent LPA Planning Activity

LPA name	East Devon District Council
Applications in search window	0
Major applications (10+ dwellings)	0
Refusals (refusal rate)	0 (0%)
Appeals lodged	0

LPA portal data feed unavailable at the date of assessment. The figures above default to zero where no data was returned. Manual verification against the LPA's online planning register is recommended before relying on these counts as a planning-history signal.

Portal note: Portal request to publicaccess.eastdevon.gov.uk/online-applications failed. The portal may be temporarily unavailable. Check manually: <https://publicaccess.eastdevon.gov.uk/online-applications>

5.3 Comparable Transactions and Market Context

Source area	EAST DEVON
Headline market signal	EX10: median price £400,000 (375 transactions). YoY -10.0%. Market decreasing (-33% volume change)
Data year	2026

6 Planning Policy Framework

6.1 National Policy

The proposal engages several December 2024 NPPF tests. data pending presents a fatal Tier 1 objection on current desktop evidence, but two carry the site through to detailed Tier 2 work. Paragraph 77 requires a deliverable five-year supply; East Devon falls materially short at 2.97 years. Paragraphs 60-68 seek a sufficient supply of homes with an appropriate mix and affordable provision. Paragraphs 7-10 frame the economic, social and environmental objectives of sustainable development. A modest edge-of-settlement scheme on an emerging allocation can satisfy these in principle. Paragraph 11(c) supports approving development that accords with an up-to-date plan, relevant once Sidm_31 is adopted. The breadth of 'policies for the supply of housing' was settled in Suffolk Coastal District Council v Hopkins Homes Ltd [2017] UKSC 37. Paragraphs 124-127 seek efficient land use appropriate to character. Fifteen dwellings on roughly one hectare represents a low, contextually-led density suited to a National Landscape edge. Paragraphs 128-141, including 131-135, 136-139 and 140-141, require well-designed places, response to local character, and tree-lined streets. Paragraphs 85-91 seek healthy, accessible communities. Paragraphs 158-166 require a proactive climate-change response. Paragraph 212 attaches great weight to conserving landscape and scenic beauty in National Landscapes. Whether 15 dwellings is 'major development' under paragraph 220 is a matter of judgement, not the statutory ten-dwelling threshold. This should be confirmed at Tier 2. Paragraphs 38-48 and 55-58 govern positive decision-making and the use of conditions. Mead Realisations Ltd v SSLUHC [2025] EWCA Civ 32 confirms PPG carries the same status as the Framework.

NPPF Dec 2024 paragraph-by-paragraph applicability

The paragraphs below are the NPPF Dec 2024 anchor set for a strategic planning advisory. Each row records whether the paragraph engages on this site and why. Engaged paragraphs frame the planning balance discussion in §10; not-engaged rows confirm the Inspector test was considered and discounted on evidence.

Para	Topic	Engaged	Reason
11	Presumption in favour of sustainable development	YES	Decision-taking limb 11(d) — strong-reason tilted balance.
47	Determination in accordance with the development plan	YES	s.38(6) PCPA 2004 framework anchor.
61	Standard method for housing need	YES	0.8% baseline + 95% multiplier on affordability ratio. Mandatory.
76	Five-year housing land supply requirement	YES	Five-year supply with 5% buffer (default).
77	HLS buffer threshold	YES	5% default; 20% buffer if HDT <85%.
78	Housing Delivery Test trigger	YES	HDT <75% — policies for the supply of land are out-of-date.
79	HDT consequences cascade	YES	<95% Action Plan; <85% 20% buffer; <75% tilted balance.
189	AONB / National Landscape conservation	YES	Great weight to conserving and enhancing landscape and scenic beauty. (site within AONB / National Landscape)

NPPF Dec 2024 (revised 12 December 2024). T5/T6 rendering shows engaged paragraphs only — full set available at T7+.

6.2 Local Policy

Adopted Local Plan	East Devon Local Plan 2013-2031 (Adopted)
Emerging Plan	East Devon Local Plan 2020-2040 (Submitted for Examination, Regulation 22)
Neighbourhood Plan	Sid Valley Neighbourhood Plan (Made November 2019)

6.3 Housing Land Supply

HOUSING LAND SUPPLY	FIVE-YEAR THRESHOLD
2.97 years	NOT MET

East Devon District Council cannot demonstrate a five-year housing land supply (2.97 years). The tilted balance at NPPF Dec 2024 paragraph 11(d) is engaged. This is a significant material consideration in favour of the development.

Deliverability stress-test

The headline figure relies on assumed build-out rates and small-site windfall persistence. The scenarios below indicate where the supply position would land under common shortfall patterns. Indicative only; underlying methodology in the Methodology Note appendix.

Scenario	Adjusted HLS	Tilted balance	Sensitivity rationale
Baseline (LPA-stated)	2.97 years	TILTED	As published in the LPA's most recent housing land supply statement.
-15% large-site delivery	2.52 years	TILTED	Reflects historic build-out underrun on strategic allocations vs trajectory.
+10% small-site lapse rate	2.67 years	TILTED	Reflects windfall and small-site permissions that lapse before completion.
Combined worst case	2.27 years	TILTED	Both stresses applied — defensive position for any tilted-balance argument.

7 Heritage Assessment

Conservation Area	No
Heritage Assets (search area)	25
Listed Buildings	24
Scheduled Monuments	1

8 Landscape Character

National Character Area	147: Blackdowns
Landscape Character	

The site is within an Area of Outstanding Natural Beauty (AONB) / National Landscape. Great weight should be given to conserving and enhancing landscape and scenic beauty under the National Landscape duty in NPPF Dec 2024. Major development in a National Landscape is subject to the exceptional circumstances test (NPPF Dec 2024 National Landscape major-development test).

9 Ecological Designations

SSSI	6 within search area
SAC	11 within search area
SPA	7 within search area
Ramsar	0 within search area

European / international designated sites identified. A Habitats Regulations Assessment (HRA) screening may be required to determine whether the development could have a likely significant effect on the integrity of these sites.

10 Flood Risk

Flood Zone	1
Surface Water Risk	Very Low
Historic Flooding	No recorded events

11 Ground Conditions

Bedrock Geology	Sidmouth Mudstone Formation
Superficial Deposits	None recorded at this location
Made Ground	No made ground present

12 Other Statutory Regimes

Regime / consent route	Status	Position from desktop screening
Listed Building Consent (s.7 Planning (LBCA) Act 1990)	SETTING DUTY	24 listed buildings within search area — section 66(1) statutory duty + heritage setting assessment engaged; LBC only required if direct works to a listed building
Scheduled Monument Consent (s.2 Ancient Monuments and Archaeological Areas Act 1979)	ENGAGED	1 scheduled monument(s) within search area
Tree Preservation Order consent (Town and Country Planning (Tree Preservation) (England) Regulations 2012)	NOT ENGAGED	OUTSTANDING — check with EDDC. Trees present on site boundary (confirmed by applicant) but no TPO detected by constraint API
Public Right of Way diversion (s.119 Highways Act 1980)	NOT ENGAGED	No PRoWs identified on or crossing the site
Highways works (s.278 / s.38 Highways Act 1980)	ENGAGED	Major or commercial scheme — s.278/s.38 agreement with the Highway Authority likely
Water resources / DWMP / Nutrient or Water Neutrality	ENGAGED	Nutrient neutrality catchment
Article 4 direction (permitted development rights removed)	ENGAGED	Article 4 in force — confirm scope; some PD rights are removed
Party Wall etc. Act 1996 notice	NOT ENGAGED	No directly adjacent residential properties recorded

Status reflects desktop screening only. Each regime sits alongside the primary planning permission and may proceed on a different statutory timetable. Where a row reads FURTHER CHECK, site-specific survey or pre-application advice is recommended before submission.

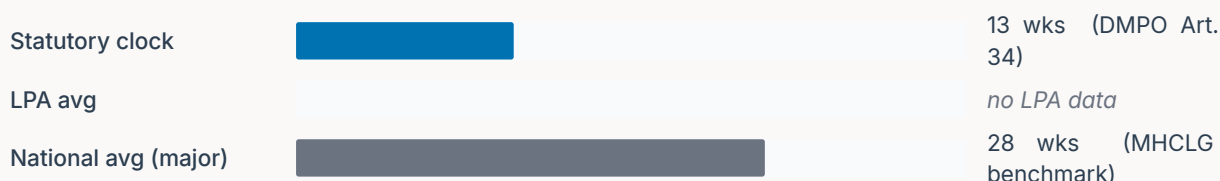
13 Planning Risk Assessment

The following traffic light grid summarises the planning risk across key assessment areas. Each area is rated based on the desktop analysis in this report.

Risk Area	Risk Level	Commentary
Planning Policy	MEDIUM	2.97 years HLS — tilted balance engaged but NPPF Dec 2024 footnote 7 policies override (National Landscape area test, heritage paragraphs 205-214 (NPPF Dec 2024 Ch 16), Habitats sites); LPA decision-making weight retained.
Green Belt	LOW	Not in Green Belt
Heritage	MEDIUM	1 scheduled monument, 24 listed buildings in search area
Landscape	HIGH	AONB / National Landscape
Ecology	HIGH	Ancient Woodland engaged (NPPF Dec 2024 paragraph 193(c)), 11 SAC, 7 SPA, nutrient-neutrality catchment
Flood Risk	LOW	Flood Zone 1

Determination timeline forecast

Statutory clock vs the LPA's recent average vs national benchmarks. The statutory period assumes no extension of time agreement and starts at validation. Most major applications run beyond statutory by 4-12 weeks.



Bars scaled to a 40-week reference. Where an LPA average exceeds the statutory clock by 1.5x, an extension of time (EoT) agreement is highly likely; programme accordingly.

LPA Appeal Risk Profile MEDIUM

This LPA has a **30.7% appeal overturn rate** (192 allowed out of 626 appeals over 10 years), **above** the national average of 30.3%.

Costs were applied for in **12 allowed appeals**, indicating the inspector considered the LPA's refusal unreasonable in those cases. Overall costs application rate: 5.6%.

Constraint-Specific Rates

- Green belt: 0% (0/11 appeals)
- Aonb: 17.5% (7/40 appeals)
- Sssi: 0% (0/1 appeals)
- Listed building: 27.3% (6/22 appeals)
- Flooding: 0% (0/1 appeals)

Risk Factors

- 12 costs applications in allowed appeals (inspector found LPA behaviour unreasonable)

Recent Allowed Appeals with Costs

Inspector found LPA behaviour unreasonable in these cases:

- **3369422** (2025-10-27) — Other minor developments
- **3330735** (2024-03-20) — 9 dwellings — Minor Dwellings
- **3323724** (2024-02-12) — Minor offices/R&D/light industry

Source: GOV.UK PINS Casework Database. Figures are intended to be independently verifiable from the source data.

Housing Delivery Test Profile

LOW

East Devon scored **118%** on the Housing Delivery Test (2023).

Homes required: **2,482** | Homes delivered: **2,940** | Delivery rate: **118%**

Consequence

No HDT consequences (delivery above 95% threshold)

Delivery Trend

Over-delivering

Planning Significance

East Devon scored 118% on the Housing Delivery Test (2023), which is above the 95% threshold. No HDT consequences apply. The standard 5% buffer applies to the 5-year housing land supply calculation.

Source: MHCLG Housing Delivery Test. Data independently verifiable from GOV.UK.

LPA Planning Statistics Profile

MEDIUM

East Devon has a **9.7% refusal rate** across 19,314 decisions, below the national average of 12.4%.

Major application refusal rate: **18.8%**.

Speed of decision: **72.6%** of applications determined within statutory timescales.

Risk Factors

- Slow decisions: 72.6% in time vs national 85.3%

Source: GOV.UK Planning Statistics (quarterly). Figures are intended to be independently verifiable from the source data.

LPA Decision Speed Profile

LOW

Application Type	This LPA	Statutory Target	National Avg
Non-major (8 weeks)	81.5%	8 weeks	79.3%
Major (13 weeks)	88.5%	13 weeks	80.1%

East Devon District Council determines **81.5%** of non-major applications within statutory timescales, above the national average of 79.3%.

Major applications: **88.5%** determined in time (above national 80.1%).

Decision Quality (Appeal Overturn Rates)

Major applications: **7.8%** overturned at appeal.

Non-major applications: **1.4%** overturned at appeal.

Source: MHCLG Live Tables 151 to 154 (Planning Performance) — rolling 24-month measurement window per the LPA designation methodology (Improving Planning Performance, MHCLG). Figures reflect the formal designation metric, not a direct count of appeal allowances; refer to the LPA's appeal record at PINS for case-level detail.

Source: MHCLG Tables Live Tables 151 to 154 (quarterly). Extensions of Time are commonly agreed to allow completion of surveys and negotiations — statutory timescale metrics reflect agreed determination periods. Figures are intended to be independently verifiable from the source data.

Housing Affordability Profile

MEDIUM

East Devon District Council has a **workplace-based affordability ratio of 9.86** (2023), **above** the national average of 8.28. Median house prices are 9.86 times median workplace earnings.

Standard method housing need uplift: **40%**. This significant uplift reflects acute affordability pressure and strengthens the case for housing delivery.

Source: ONS Housing Affordability in England and Wales (annual). Figures are intended to be independently verifiable from the source data.

Committee Override Risk Assessment

MEDIUM

At **15 dwellings**, this is a major application under the Town and Country Planning (Development Management Procedure) (England) Order 2015. Major applications are significantly more likely to be determined by planning committee rather than under delegated powers.

Costs Risk if Committee Overrides Officer

If the planning officer recommends approval but the committee refuses, the costs risk is **very high**. PINS data from 3,550 classified decision letters shows:

- **39 against-officer refusals identified nationally — all 39 allowed on appeal (100%)**
- **24 of 39 had costs awarded against the LPA (62%)**
- **1,777 homes delayed by these committee overrides**
- Average costs award: £20,000–£50,000+ for major residential appeals at inquiry

Planning Reform Context

The Planning and Infrastructure Act 2025 introduces a national scheme of delegation (target commencement: 30 September 2026). Under the draft Regulations, major applications would only go to committee if a gateway test is met: the application must raise “significant planning matters” or issues “of significance to the local area”, with both the nominated officer and nominated member agreeing. Applications broadly complying with a detailed site allocation should not meet this threshold. This reform directly addresses the pattern of committee override refusals evidenced above.

Strategic Recommendation

Pre-application engagement should seek to understand whether the case officer expects the application to be determined under delegated powers or referred to committee. If committee determination is likely, ensure the application addresses member concerns (often design, character, and amenity impacts) as thoroughly as the technical planning issues.

Source: GOV.UK PINS Casework Database (3,550 classified decision letters, 10-year dataset). Planning and Infrastructure Act 2025 Schedule 1. Figures are intended to be independently verifiable from the source data.

Appeal Risk Scorecard — qualitative

Six named risk factors derived from this LPA's 10-year appeal record and the scheme's policy/constraint exposure. Each factor is rated independently with its source cited; the report deliberately does not aggregate the factors into a single probability or overall verdict — that aggregation would imply a reliance signal we cannot defend at appeal.

Factor	Rating	Value	Reasoning
LPA overturn rate vs national	MEDIUM	30.7% vs 30.3% national	LPA overturn rate 30.7% is above national average (30.3%) by 0.4 pp. A higher overturn rate signals applicants succeed against this LPA.
Costs awarded against LPA	HIGH	5.6% costs rate (12 of allowed)	Costs were awarded against the LPA in 12 of allowed appeals (5.6%). Recurrent costs awards indicate the Inspector found LPA conduct unreasonable.
Constraint-specific overturn rate	MEDIUM	aonb: 17.5% over 40 appeals	For the engaged "aonb" constraint this LPA has overturned 17.5% of appeals over a 40-appeal sample. Reasonable applicant prospects on this constraint.
Recent trend (2-year window)	MEDIUM	recent 34.7% vs 10-yr baseline 30.7%	Last 2 years overturn rate 34.7% is 4.0 pp above the 10-year baseline. Recent direction is towards more applicant success.
5YHLS / HDT context	LOW	HLS = 2.97 years (tilted balance engaged)	LPA cannot demonstrate a 5-year housing land supply (2.97 years). NPPF Dec 2024 paragraph 11(d) tilted balance is engaged — this is a strong material consideration in favour of housing schemes at appeal.
Policy conflict intensity	MEDIUM	1 primary refusal-reason policies engage	1 primary refusal-reason policies engage on this scheme: NPPF para 189 (AONB). Manageable policy exposure — focused mitigation per constraint.

Decision pathway (informational)

Committee determination rate not in lpa_performance enrichment for this LPA.

Density context. Insufficient comparable-scheme density data to produce a contextual benchmark.

13.1 Decision Gates

Five gates governing whether further consultant spend is justified. The same gate table is rendered at the front of the Strategic Decision Summary — single source, so the planning body and the Strategic Decision Summary cannot disagree on gate state.

Gate	Status	Evidence	Client Decision	Next Spend
Planning route plausibility	WATCH	National Landscape (AONB): Site within East Devon National Landscape (formerly AONB, designated 1963). Nutrient neutrality: Site within the river_axe nutrient-neutrality catchment — Habitats Regulations Assessment required; no permission until nutrient-neutrality solution evidenced (CG Fry v SoS [2025] UKSC 35). Ancient Woodland: Ancient Woodland on or near site — NPPF Dec 2024 paragraph 193(c) substantial-harm presumption; loss permitted only in wholly exceptional circumstances.	Is there a plausible route to permission?	Pre-application engagement with the LPA — £500-£2,000
Access feasibility	WATCH	Accessibility Index (PTAL-style) grade 1a recorded — public-transport accessibility characterised. Access geometry, visibility splays and any required Section 278 works are not assessed at desktop stage — independent highways advice required before submission.	Can a safe and policy-compliant access be formed?	Topographic survey + highway access feasibility note from a qualified transport consultant — £2,500-£6,000
Ecology / HRA cost exposure	WATCH	Pre-determination legal hold point — Habitats Regulations 2017 Regulation 63 requires Appropriate Assessment / no-adverse-effect conclusion before permission can be granted (CG Fry v SoS [2025] UKSC 35). Mitigation routes (off-site nutrient credits, on-site wetland) provide a lawful path; this is a programme hold-point, not a development blocker, where evidenced.	Will ecology or HRA add disproportionate cost or delay?	Nutrient-neutrality strategy + credit-cost review — £3,000-£6,000 (strategy) + credits at market rate
GDV stress envelope	OPEN	Central profit on cost 45.4%; at GDV -10% margin would be 104.4%; at GDV -15% margin would be 93.1%. Position withstands a 15% GDV reduction while retaining a double-digit return on cost — financial envelope is robust.	Does the project survive a 10-15% GDV reduction?	Confirm central case with QS cost plan once architect drawings are available — £2,500-£5,000
Pre-app support-iveness	OPEN	Appeal-overturn rate 30.7% — signals a fair appeal pathway if refused.	Will the LPA be supportive enough to justify proceeding?	Pre-application meeting + written offer of response — £500-£2,000

OPEN — gate is clear, proceed. WATCH — gate needs targeted consultant work before authorising the next stage. BLOCKING — do not authorise further spend until the blocking question is answered. Next-spend bands are indicative consultant fees as at the date of this report.

14 Statutory Exposure Snapshot

14.1 S106 + CIL Indicative Quantum

LPA CIL rate (residential)	£70 / m ²
Scheme GIA basis	1,275 m ²
Indicative CIL (gross)	£89,200
S106 indicative range (P10 – P90)	£86k – £604k
S106 median expected	£345k

• CIL figure is gross-indicative — excludes existing-use credit (Reg 40), indexation (Reg 40 + BCIS All-in TPI), and any social-housing or self-build relief. Net liability typically 70-95% of gross.

14.1.1 S106 Line-Item Forecast (per-head)

Quantum calculated as dwelling-yield × per-pupil / per-person benchmark cost, summed across six statutory categories. Population basis: 36 persons (15 dwellings × 2.4). National-average benchmarks throughout.

Education — Primary place provision	£83k
Education — Secondary place provision	£72k
Healthcare — Primary care capacity contribution	£27k
Sport & recreation — Indoor + outdoor sport	£22k
Community / library infrastructure	£5,400
Open-space financial contribution (where on-site infeasible)	£11k
Total — itemised forecast	£219,300

Basis per line item:

- **Education — Primary place provision** — 0.25 pupils per dwelling × 15 dwellings = 3.8 places · DfE Securing Developer Contributions for Education (Nov 2019, updated 2024) + BB103 indexed place cost
- **Education — Secondary place provision** — 0.15 pupils per dwelling × 15 dwellings = 2.2 places · DfE Securing Developer Contributions for Education (Nov 2019, updated 2024) + BB104 indexed place cost
- **Healthcare — Primary care capacity contribution** — 2.4 persons per dwelling × 15 dwellings = 36 persons · HUDU NHS Healthy Urban Development Unit primary-care infrastructure (2020) + NHSE Long Term Plan capital

- **Sport & recreation — Indoor + outdoor sport** — 36 persons × £600 per person (FIT 6-Acre + Sport England) · Sport England Active Design + Active Places Power (Apr 2024) + Fields in Trust Beyond the Six Acre Standard (Aug 2022)
- **Community / library infrastructure** — 36 persons × £150 per person · Library Code of Practice + Active Communities (national-average benchmark)
- **Open-space financial contribution (where on-site infeasible)** — 36 persons × £300 per person · Fields in Trust Beyond the Six Acre Standard (Aug 2022) capitalised
- No LPA-specific developer-contribution SPD figures available for East Devon District Council. Line items use national-average benchmarks from DfE, NHSE/HUDU, Sport England, Fields in Trust. Confirm against the adopted LPA SPD before relying on figures in negotiation.
- All contributions subject to the CIL Regulation 122 statutory tests (necessary; directly related to the development; fairly and reasonably related in scale and kind). Final quantum is subject to viability appraisal and negotiation per NPPF §57 (Dec 2024).
- AH financial contribution (off-site commuted sum) is separate and is calculated in the viability appraisal — not duplicated in this line-item forecast.

14.2 Affordable Housing Strategy

Policy AH provision threshold (typical)	25% on-site
Affordability ratio trend	(direction: "", change: 0)
Grey Belt golden rules engaged?	No — standard policy applies

Standard policy applies. Tenure mix and exact percentage are confirmed at the application stage based on viability evidence; the figure above is the typical adopted-policy starting point.

14.3 Biodiversity Net Gain (BNG) Snapshot

Mandatory 10% biodiversity net gain applies under the Environment Act 2021 Schedule 7A (in force for major sites since 12 February 2024 and minor sites since 2 April 2024). Forthcoming changes (per Defra implementation pathway): 0.2 ha exemption from end-July 2026; NSIP extension on 2 November 2026.

Baseline biodiversity units (desktop)	2.16
10% net gain target	0.22 units
Indicative delivery cost (low – high)	£5,400 – £11k
Indicative cost (mid)	£7,600

Cost basis (read carefully). These figures are a Site Intelligence house deterministic assumption band — internal indicative figures only, not a quotation. They are NOT DEFRA published rates: DEFRA does not set off-site private market prices, and DEFRA statutory credit prices are last-resort prices, NOT a market guideline. Habitat tier mix can shift the range materially; site-specific brokerage quote required before any financial decision.

14.4 EIA / EOR Watch

Schedule 2 EIA development screening engaged. Dwelling count 15 or scheme exceeds 5 ha / 1 ha urban / 0.5 ha sensitive area thresholds (T&CP (EIA) Regs 2017, Sch 2 §10(b)) . EIA Screening Opinion required from the LPA before submission; Environmental Statement scope determined at Scoping stage.

14.5 Viability Headline (cross-reference)

The figures below are **cross-referenced from the linked Concept Feasibility Report** and form the primary advice on viability. They are reproduced here only to anchor the planning balance discussion in the financial reality of the scheme. The full assessment, sensitivity analysis, and methodology sit with the qualified viability deliverable.

Gross Development Value (GDV)	£8,634,625
Total Development Cost (TDC)	£3,801,094
Developer profit (indicative)	£1,726,925
Residual Land Value (RLV)	£3,106,606

Source: linked Concept Feasibility Report. Figures stage-dependent (desktop estimate vs QS confirmed) — see the Concept Feasibility deliverable's methodology note for detail.

15 Comparable Scheme Benchmark

Comparable schemes within 2 km radius of the site, normalised on key planning-relevant metrics. The table answers “what has the LPA permitted at what density and how long did it take?” — the practical anchor for a defensible application strategy.

No comparable schemes returned by the desktop search at the standard radius. This may indicate (a) a low-volume LPA, (b) a unique site type with no recent precedent, or (c) a data-feed gap. Manual comparator research is recommended before relying on the absence as a signal.

16 Recommended Strategy

Recommended Strategy — Redesign

Test layout against National Landscape (AONB) before committing to a full application; the current concept should be treated as a starting point only.

Verdict source: Client Decision Panel *overall_advice*. Section 10, the Executive Summary and the Decision Panel render the same enum word — Cat-VERDICT-CONSISTENCY enforces.

The recommended route below is the same one rendered at the front of the Strategic Decision Summary — single source, so the planning body and the Strategic Decision Summary cannot disagree.

RECOMMENDED ROUTE

Pre-app + landscape-led full application

Indicative Stages

- | | |
|------|------------|
| 1. — | Week 0–2 |
| 2. — | Week 2–4 |
| 3. — | Week 4–6 |
| 4. — | Week 6–10 |
| 5. — | Week 10–16 |
| 6. — | Month 4 |

Key actions:

1. Commission specialist surveys identified by the constraints assessment
2. Engage with East Devon District Council through pre-application advice
3. Prepare design proposals responding to the identified constraints

17 Decision Pathway

The actions below sequence the priority workstreams the project team should pursue, in priority order. Each row identifies the action, its purpose against the constraint and policy evidence, the indicative timing window, and the consultant or party responsible. The pathway is derived from the engaged constraints and dwelling count for this site; the sequence is intended to surface the highest-risk evidence first so that pre-application engagement can be focused on the workstreams that most affect determination.

1. Confirm site polygon, red-line and ownership / title

Lock the assessment boundary so every downstream consultant works to the same envelope

Owner: Solicitor · Timing: Now

2. Confirm National Landscape boundary and emerging allocation status

Establish principle risk and the policy weight engaged under the National Landscape policy framework) + footnote 7

Owner: Planner · Timing: Now

3. Commission a Heritage Statement addressing setting and the section 66/72 statutory duties

Evidence the heritage balance under NPPF Dec 2024 paragraphs 214 (substantial harm refusal test) / 215 (less-than-substantial harm public-benefits balance); LBC route mapped if direct intervention

Owner: Heritage consultant · Timing: Pre-app

4. Commission HRA screening and (where engaged) nutrient-neutrality assessment

Discharge the Habitats Regulations Assessment and evidence a nutrient-neutrality solution before submission (CG Fry v SoS [2025] UKSC 35)

Owner: Ecologist · Timing: Pre-app

5. Confirm adopted Local Plan policy compliance and prepare a planning policy appraisal

Lock the policy framework engaged by the proposal so consultant evidence aligns with development-plan tests

Owner: Planner · Timing: Now

6. Engage with East Devon District Council through pre-application advice

Surface validation requirements + officer red-flags before a £-spend on full-application work

Owner: Planner · Timing: Pre-app

7. Commission a Landscape and Visual Impact Assessment (LVIA) by a CMLI-registered landscape architect

Main refusal-risk evidence under the great-weight test; landscape-led layout iteration before design-freeze

Owner: Landscape consultant · Timing: Pre-app

8. Commission a Transport Statement or Transport Assessment

Evidence highway capacity, access geometry and trip-generation against the LPA's adopted standards

Owner: Transport consultant · Timing: Pre-app

Owner column references the consultant discipline expected to lead each workstream; the project team may combine roles where a single firm covers multiple disciplines. Timing column is indicative — sequencing within each window is the project manager's call.

18 Architect Handover Layer

This section is written for the architect taking the brief forward. It packages the desktop intelligence in the form the design team needs at concept stage — the planning implications behind each engaged constraint, the layout questions to test before fixing yield, and the questions to put to the LPA at pre-application. The architect remains the author of the design response; this section does not fix layout or massing. Consultant ownership and sequencing sit in the Decision Pathway section of this report.

18.1 Design Implications

Two columns: the engaged constraint and the design implication the architect should address. The list is deliberately constraint-led — none of it presupposes a particular layout; the architect remains the

author of the design response. The relevant planning issue and policy / legal basis travel as numbered notes below the table so the architect’s reading line stays clean.

Constraint	Note	Design implication
East Devon National Landscape (formerly AONB, designated 1963)	1	Landscape-led massing, restrained roofscape, materials drawn from the local vernacular; LVIA-led layout testing before design freeze.
Listed-building setting	2	Maintain identified key views; reduce massing where it would dominate the heritage asset; consider view corridors in the layout.
Habitats / nutrient neutrality	3	Reserve land take for on-site mitigation, SuDS and habitat enhancement; coordinate with the nutrient strategy before fixing developable area.
Trees, hedgerows, TPOs	4	Retain boundary vegetation where possible; treat root protection areas as no-build; net developable area will reduce.
Major-application thresholds (10+ dwellings)	5	Layout must accommodate refuse / emergency / pedestrian and cycle movement; affordable-housing block needs a credible tenure mix and clustering strategy.
Site boundary / red-line	6	Do not freeze layout until the red-line is confirmed; avoid designing across third-party land or unregistered slivers.
Submission route	7	Design should be robust enough to survive committee or public objection in the chosen submission route.
Density assumption (15 dwellings)	8	Layout testing should challenge the dwelling-count assumption before treating it as fixed.

Relevant policy / legal basis (notes)

1. NPPF Dec 2024 chapter 15 great-weight duty for protected landscapes; major-development test where engaged.
2. Section 66(1) Planning (Listed Buildings and Conservation Areas) Act 1990 statutory duty; NPPF Dec 2024 paragraphs 214 (substantial harm refusal test) / 215 (less-than-substantial harm public-benefits balance) heritage balance.
3. Habitats Regulations 2017 Regulation 63 Appropriate Assessment; nutrient-neutrality solution required before the application is capable of approval subject to satisfaction of policy and process.
4. BS 5837:2012 Root Protection Areas; hedgerow retention and TPO duties under the Town and Country Planning Act 1990.
5. Statutory consultee triggers (Highways, Lead Local Flood Authority); affordable-housing policy thresholds; pre-app scrutiny intensifies.
6. Title and ownership boundary must be locked before consultant evidence is finalised; certificate B/C/D may be required.

7. Outline / full / hybrid choice affects what is fixed at determination versus reserved for later approval.
8. Density is a starting assumption derived from briefing; the engaged constraints may reduce achievable yield.

18.2 Layout Testing Requirements

The bullets below are the layout questions the architect should test before treating the briefed dwelling figure as fixed. Each is framed as a test of feasibility against the engaged constraints, not as a layout instruction.

- Whether 15 units can be accommodated without unacceptable East Devon National Landscape (formerly AONB, designated 1963) landscape harm.
- Whether access geometry, visibility splays, refuse tracking and emergency access can be achieved.
- Whether SuDS and nutrient-mitigation provision require land take that reduces net developable area.
- Whether affordable-housing requirements affect the unit mix and the layout's clustering strategy.
- Whether heritage-setting constraints require view corridors or reduced massing on the heritage-facing edge.
- Whether tree and hedgerow retention reduces net developable area below the briefed yield.
- Whether a lower-density or edge-softened layout would materially improve planning prospects without losing scheme viability.

18.3 Suggested Pre-Application Questions

Numbered list of questions the project team should put to East Devon District Council at pre-application. Questions only appear here when the desktop evidence base supports them; questions that depend on site-specific data not yet to hand are omitted.

#	Question
1	Does the LPA consider 15 dwellings to be major development in the East Devon National Landscape (formerly AONB, designated 1963) context?
2	What level of LVIA / landscape assessment will be required at application stage?
3	Does the LPA agree that the tilted balance is engaged due to the 2.97-year housing land supply position?
4	What affordable-housing percentage and tenure mix should be assumed at pre-application stage?
5	What HRA / nutrient-neutrality evidence will be required before determination?
6	Are there known highways concerns with access from the local road network that should shape access design?
7	Are there any known TPO, hedgerow or arboricultural constraints not captured by desktop screening?
8	Would the application likely be delegated or referred to East Devon District Council planning committee?

The handover layer is conditional on the engaged constraints recorded in this report; rows are added or omitted by rule rather than by narrative.

19 Stakeholder and Engagement Plan

The following stakeholders should be engaged in advance of submission. Statutory consultees are bound by 21-day determination clocks once the application is validated; non-statutory consultees should be engaged during the formative stage of the proposal in accordance with the **Localism Act**

2011 and the **Gunning principles** (consultation at a formative stage; sufficient information; adequate time; conscientious consideration of responses).

Stakeholder	Category	Trigger / engagement mode
Local Planning Authority (case officer + planning manager)	Authority	All projects — Formal pre-application (recommended T5+); informal officer dialogue (T2-T4)
Parish / Town Council (or Neighbourhood Forum in London)	Community (statutory)	All projects within parish boundary; T4+ should engage pre-submission — Pre-submission briefing recommended T4+; formal Reg 15 consultation post-validation
Ward councillors (district + county where relevant)	Political (statutory)	All major applications (T5+); minor applications in marginal wards — Bilateral briefings T5+; political risk profile in §10
Highway Authority (county / unitary)	Statutory consultee	T5+ residential (10+ dwellings); any development affecting the public highway — Pre-app technical meeting recommended T7+
Lead Local Flood Authority (LLFA - usually county / unitary)	Statutory consultee	T5+ residential (major) OR any development requiring SuDS — Pre-app technical meeting T5+
Historic England	Statutory consultee (constraint-triggered)	Grade I or II* listed buildings affected; Conservation Areas; Scheduled Monuments; Registered Parks; WHS — Pre-app advice recommended where Grade I/II* or SM affected
Local community (residents associations + civic society + neighbourhood groups)	Non-statutory	T5+ residential; all schemes in sensitive locations (Conservation Areas, AONB, listed building settings) — Statement of Community Involvement compliant with Localism Act 2011 + Gunning principles (consultation at formative stage, sufficient information, adequate time, conscientious consideration)

Statement of Community Involvement

Where required, the Statement of Community Involvement should describe **what** engagement was undertaken, **who** was engaged, **when**, and **how responses were considered** — the four Gunning limbs. Failure to comply can ground a procedural challenge under judicial review.

20 General Desktop Limitations

20.1 What This Report Does NOT Assess

This is a desktop intelligence report forming part of the Site Intelligence advisory pack. It does not include intrusive investigation, measured survey, statutory consultation, or formal consultant sign-off unless expressly commissioned. The following are outside the scope of this assessment:

- Intrusive site investigation (boreholes, trial pits, soil sampling)
- Topographic or measured building survey
- Structural assessment of existing buildings or retaining structures
- Detailed ecological survey (Phase 2 habitat surveys, protected species surveys)
- Detailed arboricultural survey to BS 5837
- Archaeological field evaluation (geophysical survey, trial trenching)
- Noise, vibration, or air quality monitoring
- Detailed drainage design or hydraulic modelling
- Legal title review or boundary verification

20.2 Data Gaps

The following data was not available at the time of this assessment:

- Site-specific infiltration test results (BRE Digest 365)
- As-built drainage records for existing development
- Ground investigation data (if no published BGS borehole logs are available for the site)
- Detailed topographic survey data (EA LIDAR used where available)
- Historic land use records prior to available OS mapping epochs

20.3 Key Assumptions

This report has been prepared on the basis of the following assumptions:

- Information provided by the client is accurate and complete

- Public dataset boundaries (flood zones, conservation areas, etc.) are current at the date of this report
- The proposed development is as described in the project brief and does not materially change in scale, layout, or use class
- No contamination, ground instability, or other hazard exists beyond that identified in publicly available records
- Planning policy documents referenced are current at the date of this report

20.4 Specialist Investigation Required

The following specialist investigations may be required depending on the constraints identified in this report:

- Site-specific ground investigation (where contamination or geotechnical risk is identified)
- Phase 2 ecological surveys (where Phase 1 identifies potential for protected species)
- Detailed arboricultural impact assessment (where TPO trees or significant vegetation is present)
- Detailed noise impact assessment (where the site is adjacent to significant noise sources)
- Heritage impact assessment by a conservation-accredited professional (where designated heritage assets are affected)

20.5 Changes That Would Require Update

This report should be reviewed and updated if any of the following occur:

- LPA pre-application response received
- Planning policy changes (NPPF, Local Plan, SPD)
- New appeal decisions on comparable sites
- Five-year housing land supply position updates
- Scheme description changes from that assessed
- New planning applications on adjacent sites

21 Data Assurance Summary

Site Intelligence applies a rigorous data assurance process to every report. This section documents the breadth of data coverage, confidence levels, and quality assurance stages applied.

21.1 Internal Data Coverage Summary

Metric	This Report	Typical Stage 1 Desktop Scope
Data sources consulted	15	3 – 8
Constraint categories checked	38	5 – 10
Data sources queried	15	0 – 2
Provenance entries recorded	15	0

Indicative comparison only. Reflects typical early-stage desktop scope rather than a formal industry benchmark; a wider technical due diligence instruction may consult more datasets at any tier.

21.2 Quality Assurance Checklist

- Automated constraint detection (38-flag desktop constraint analysis, deduped to 36 + Flood Zone)
- Source provenance recording (every data point traced to origin)
- Cross-report consistency check (automated financial figure stamping and constraint reconciliation)
- Domain cross-check against the relevant chapter of the National Planning Policy Framework, planning-practice guidance and the chartered-practitioner methodology applicable to this technical area; map review performed against the OS basemap
- Chartered-practitioner sign-off (RICS, RTPI, IHBC, CIWEM, CIEEM, ICE or other chartered specialist as applicable); Tier 2 add-on, not undertaken for this desktop product

22 Anticipated Consultee Queries

Standard statutory consultees will be notified in accordance with the Development Management Procedure Order. Site-specific consultee requirements are identified in the relevant technical reports.

23 Update Triggers

Validity Period: 6 months.

Stage 1 Desktop Planning Strategy Report is valid for 6 months. After this period, or if any of the following trigger conditions occur, the report should be reviewed and updated before reliance is placed upon its findings.

- LPA pre-application response received
- Planning policy changes (NPPF, Local Plan, SPD)
- New appeal decisions on comparable sites
- Five-year housing land supply position updates
- Scheme description changes from that assessed
- New planning applications on adjacent sites

To request an update, contact Site Intelligence quoting the document reference shown on the cover page. Updates are provided at a reduced fee where the original data remains substantially current.

Data Freshness and Reissue Triggers

The analysis and conclusions within this report are based on planning policy, guidance, and data publicly available as at **10 May 2026**. We have not updated this report for any changes that may have occurred after this date.

This report should be considered valid for a period of **6 months** from the date of issue. Its conclusions may need to be reviewed and updated in the event of any of the following:

- Publication of a new version of the National Planning Policy Framework
- Adoption of a new Local Plan or Spatial Development Strategy by the host authority
- Publication of a new five-year housing land supply or Housing Delivery Test result for the host authority
- A determined planning appeal on a like-for-like proposal in the host authority
- A material decision in the higher courts on a planning matter directly bearing on this advice

Methodology and Professional Accountability

This report represents the professional opinion of the named author. In preparing it we use modern research and drafting tools, including generative AI, to accelerate desk-based research, structure data analysis, and surface relevant precedent. All material findings, policy citations, and case-law references are independently verified against primary sources by the named author, who remains professionally accountable for the conclusions in line with the RTPI Code of Professional Conduct (1 February 2023).

24 Important: Limitations, Disclaimers and Conditions of Use

1. Named Client and Reliance Restriction

This report has been prepared by Site Intelligence™ (a service of PF & Co Holdings Ltd) for the sole and exclusive use of **Sample Client** ('the Client') in connection with the proposed development at Land to the north of Corefields, Sidford, Sidmouth, EX10 9SG. No other party may rely upon, reproduce, or distribute this report or its findings without the prior written consent of Site Intelligence. Any unauthorised use or reliance by third parties is entirely at their own risk, and Site Intelligence accepts no responsibility or liability in such circumstances.

2. Purpose Limitation

This report has been prepared solely for the purpose stated herein. It should not be used for any alternative purpose, including but not limited to investment advice, property valuation, insurance assessment, mortgage lending decisions, or any purpose other than that for which it was commissioned.

3. Third-Party Exclusion

This report does not confer any rights or benefits on any third party under the Contracts (Rights of Third Parties) Act 1999 or otherwise. No third party may enforce any term of this report.

4. Information Reliance

The findings in this report are based on information provided by the Client, publicly available data sources, and desktop research. Site Intelligence has not independently verified the accuracy or completeness of information provided by the Client or third parties.

5. Limitations of Investigation

The scope of this report is limited to a Stage 1 desktop planning-advisor undertaken on the date of this report. The findings reflect conditions and information available at the date of investigation. Conditions may change over time, and the report should not be relied upon beyond the validity period stated.

6. Professional Advice Caveat

This report provides professional opinion based on the information available at the time of preparation. It does not constitute legal advice, and specialist professional advice should be sought for specific matters including but not limited to structural engineering, surveying, ecology, archaeology, and contaminated land investigation.

7. No Guarantee of Outcome

Site Intelligence provides no guarantee as to the outcome of any planning application, building control submission, or statutory process. Planning and regulatory decisions are made by the relevant authorities at their sole discretion.

8. Data Completeness Caveat

While every effort has been made to identify relevant constraints and information, the absence of a recorded constraint does not guarantee that no constraint exists. Public data sources may contain gaps, errors, or omissions. The absence of a record does not guarantee the absence of a constraint.

9. Limitation of Liability

The total aggregate liability of Site Intelligence (PF & Co Holdings Ltd) under or in connection with this report, whether in contract, tort (including negligence), breach of statutory duty, or otherwise, shall be limited to **professional indemnity insurance with a £1,000,000 limit per claim; total contractual liability capped at three times the fee paid for the relevant Report (Business Terms and Conditions clause 17.2)**. Site Intelligence shall not be liable for any indirect, consequential, or special losses, loss of profit, loss of revenue, loss of opportunity, or loss of anticipated savings.

10. Copyright and Intellectual Property

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11. Statutory Authority Submission Note

Where this report is submitted to a statutory authority (planning authority, building control, Environment Agency, etc.), the authority will exercise its own professional judgement in assessing the application. Submission of this report does not confer any right of reliance upon the authority, and Site Intelligence accepts no liability for decisions made by statutory authorities.

12. Mortgage / Valuation / Purchaser Exclusion

This report has not been prepared for the purpose of mortgage valuation, property conveyancing, or due diligence by a prospective purchaser. Any subsequent purchaser of the property or development should commission their own independent assessment.

13. Report Validity Period

This report is valid for a period of 6 months from the date of issue. After this period, the report should be reviewed and updated to reflect any changes in site conditions, planning policy, or available data. Update triggers are documented in the preceding section.

14. Governing Law and Jurisdiction

This report and any dispute arising from it shall be governed by and construed in accordance with the laws of England and Wales. The courts of England and Wales shall have exclusive jurisdiction.

15. Not Financial / QS / Valuation Advice

Any cost estimates, development appraisals, or financial information contained in this report are preliminary and indicative only. They do not constitute quantity surveying advice, professional valuation, or financial advice. All cost estimates should be verified by a qualified quantity surveyor or cost consultant before being relied upon for investment or procurement decisions.

16. Terms of Engagement

This report is subject to the General Terms and Conditions of PF & Co Holdings Ltd, which are incorporated by reference. A copy is available on request.

Product-Specific Note

This Stage 1 Desktop Planning Strategy Report is a desktop assessment. It does not include site-specific survey, intrusive investigation, or specialist field work. The findings are based on publicly available data and should be read in conjunction with the Known Limitations section of this report.

Data Sources & Verification

The table below identifies the principal datasets used or flagged for verification. Where a source carries a verification URL it can be checked independently; where a source is marked “contact provider for verification” or “awaiting retrieval”, reliance should not be placed on that item until its status is updated to retrieved/verified. Data retrieval dates are recorded for audit purposes.

Wider platform datasets queried (audit log)

The table below lists every enrichment dataset queried by Site Intelligence’s platform during the production of this client pack. Not every dataset is materially relied upon by this specific report — see the Data Source Relevance section above for the flood-specific split. The full audit log is kept for completeness and source-provenance traceability.

Source / verification URL	Authority	Scope	Vintage / refresh	Retrieved
EA Flood Map for Planning https://flood-map-for-planning.service.gov.uk	Environment Agency	Flood zones, surface water risk, historic floods	2024 Q4 / Quarterly	2026-04-11
National Heritage List for England https://historicengland.org.uk/listing/the-list	Historic England	Listed buildings, scheduled monuments, registered parks	Continuously updated / Continuous	2026-04-11
MAGIC Interactive Map https://magic.defra.gov.uk	Natural England / DEFRA	SSSIs, SACs, SPAs, Ramsar sites, NNRS	Continuously updated / Continuous	2026-04-11
Multi-source constraint detection https://magic.defra.gov.uk	Various (38 datasets, deduped to 36 + Flood Zone)	Green Belt, AONB, conservation areas, TPOs, flood zones	Mixed (see per-dataset) / Mixed	—
Census 2021 https://www.ons.gov.uk/census	Office for National Statistics	Population, demographics, housing tenure, travel patterns	2021 / Every 10 years	2026-04-11
PTAL Calculation (TfL TN14) https://data.london.gov.uk/dataset/public-transport-accessibility-levels	Site Intelligence™ (TfL methodology)	Public transport accessibility index and grade	TN14 methodology (2015+) / Per retrieval (timetable-live)	2026-04-11
OpenStreetMap / Overpass https://www.openstreetmap.org	OpenStreetMap Contributors	Amenity proximity: schools, GPs, shops, transport stops	Continuously updated / Continuous	2026-04-11
BGS Geology of Britain https://mapapps.bgs.ac.uk/geologyofbritain/home.html	British Geological Survey	Bedrock, superficial deposits, made ground	Periodically updated / Annual+	2026-04-11
HM Land Registry Price Paid Data	HM Land Registry	Comparable property sale prices and transactions	Continuously updated / Monthly	2026-04-11

Source / verification URL	Authority	Scope	Vintage / refresh	Retrieved
https://www.gov.uk/government/statistical-data-sets/price-paid-data-downloads				
ONS Housing Affordability https://www.ons.gov.uk/peoplepopulationandcommunity/housing	Office for National Statistics	Affordability ratios, private rents, house prices	Latest annual release / Annual	2026-04-11
Agricultural Land Classification https://magic.defra.gov.uk	Natural England	Provisional ALC grade, best & most versatile status	Provisional (1960s-80s baseline) / Very infrequent	2026-04-11
National Character Area Profiles https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making	Natural England	Landscape character assessment and key characteristics	2013 (NCA profile set) / Very infrequent	2026-04-11
DfT Road Traffic Statistics https://roadtraffic.dft.gov.uk	Department for Transport	Annual average daily traffic counts	Annual (latest available) / Annual	2026-04-11
STATS19 Road Accident Data https://www.data.gov.uk/dataset/cb7ae6f0-4be6-4935-9277-47e5ce24a11f/road-safety-data	Department for Transport	Road traffic collisions and casualties	Annual (latest available) / Annual	2026-04-11
DEFRA Background Air Quality https://uk-air.defra.gov.uk/data/laqm-background-maps	DEFRA	Background NO2, PM10, PM2.5 concentrations	Annual map set (latest modelled year) / Annual	2026-04-11
DEFRA AQMA Boundaries https://uk-air.defra.gov.uk/aqma/maps	DEFRA	Air Quality Management Area designations	Continuously updated / Continuous	2026-04-11
EA LIDAR Data https://environment.data.gov.uk/DefraDataDownload/?Mode=survey	Environment Agency	Terrain elevation, DSM/DTM coverage	LIDAR Composite (latest available tile) / Per acquisition programme	2026-04-11
DNO Long Term Development Statement Contact provider for verification	Distribution Network Operator	Electrical grid capacity and connection assessment	Latest LTDS (per DNO) / Annual	2026-04-11
LPA Planning Portal Contact provider for verification	Local Planning Authority	Nearby planning application history and decisions	Continuously updated / Continuous	2026-04-11

Vintage = publication date of the underlying dataset. Refresh = upstream update cadence. Retrieved = when Site Intelligence fetched the record used in this report.

Policy & Legislative Sources

Document	Published By	Edition	URL
National Planning Policy Framework	DLUHC	December 2024	https://www.gov.uk/government/publications/national-planning-policy-framework--2
Planning Practice Guidance	DLUHC	Online (continuously updated)	https://www.gov.uk/government/collections/planning-practice-guidance
Planning (Listed Buildings and Conservation Areas) Act 1990	UK Parliament	As amended	https://www.legislation.gov.uk/ukpga/1990/9/contents

Local Plan: **East Devon Local Plan 2013-2031 (Adopted)** (East Devon District Council). Neighbourhood Plan: Sid Valley Neighbourhood Plan (Made November 2019).

AI-Assisted Analysis — Reference Statement

This report was prepared using AI-assisted data collation and analysis under internal quality-control procedures, in line with emerging professional-body guidance on the responsible use of AI in surveying and planning practice. All data sources are listed above with retrieval dates and verification URLs. A named professional remains responsible for reviewing and approving the contents of this report before issue. The analytical methodology and due diligence records are available on request.

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PREPARED FOR **Sample Client**

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Site Intelligence

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