

DRAFT STRATEGY ONLY

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# Planning Strategy Statement — Desktop Review

Tier 1 — Desktop intelligence

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

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

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# 1 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.

## 1.1 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.

## 1.2 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.

## 1.3 Traffic-Light Key

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

<b>LOW</b>	<b>Low risk.</b> No significant constraint identified. Standard design measures are sufficient. No specialist investigation is likely to be required.
<b>MEDIUM</b>	<b>Moderate risk.</b> A constraint or data gap has been identified that requires attention. Further investigation, a design response, or a planning condition may be needed.
<b>HIGH</b>	<b>High risk.</b> 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.

## 1.4 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.

**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.

## 2 Executive Summary

### VERDICT

**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 Statement — Desktop Review
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.

### 3 Introduction

The proposal for 15 dwellings on an emerging allocation within this protected landscape presents a finely-balanced case where housing delivery benefit must be weighed against significant landscape constraint. East Devon demonstrates only a 2.97-year housing land supply, falling materially short of the five-year minimum. The emerging East Devon Local Plan allocation Sidm\_31 carries considerable weight to the principle of residential use, and the scheme delivers four affordable homes at 25% on-site, carrying significant weight given an affordability ratio of 9.86. Economic activity carries moderate weight. However, the site lies within that designation, where the NPPF attaches great weight to conserving landscape and scenic beauty. Whether the scheme constitutes major development requires confirmation, and a GLVIA3 landscape and visual impact assessment is mandatory. Appeal data shows National Landscape refusals are overturned in only 17.5% of cases, underlining the weight of this duty. Nutrient neutrality is a pre-determination legal gateway requiring Appropriate Assessment and a nutrient budget before any grant. 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.

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
Application Type	Pre-Planning Application
Client / Applicant	Sample Client
Document Reference	999-DEMO-2026 -PFCO-REP-PlanningStatement-R01
Report Date	10 May 2026

This is a **major development** (15 dwellings). The statement addresses the full range of policy considerations including housing need, infrastructure, and environmental impact.

## 4 Site Description & Context

The Sid Valley Neighbourhood Plan was made on 7 November 2019 with 90% referendum support and forms part of the development plan.

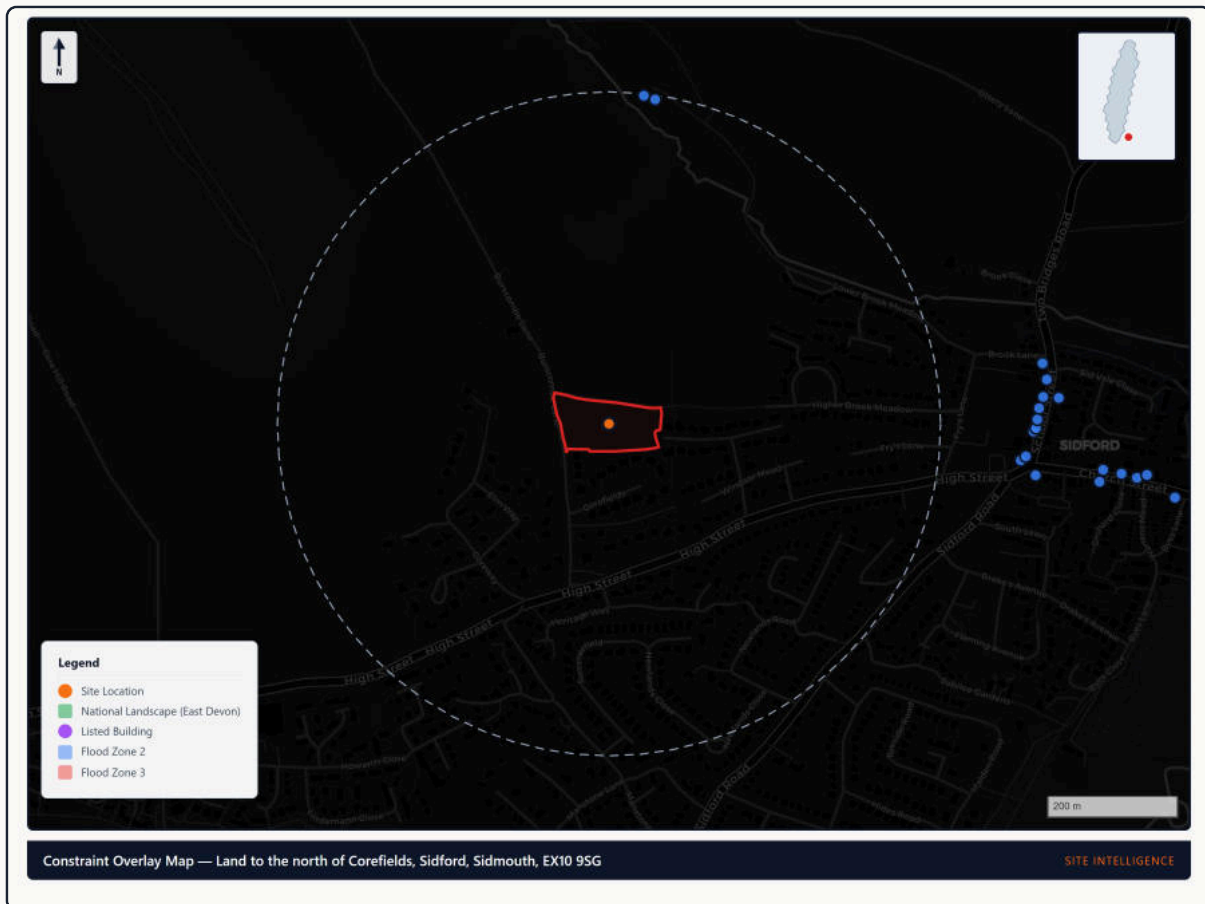
### 4.1 Site Location

<b>Site Address</b>	Land to the north of Corefields, Sidford, Sidmouth, EX10 9SG
<b>Ward</b>	Sidmouth Rural
<b>Site Area</b>	1.08 ha
<b>Elevation</b>	97m AOD
<b>Rural/Urban</b>	Small town — within built-up area fringe
<b>Settlement Boundary</b>	To be confirmed (Small town — within built-up area fringe)



Site Location Plan

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### Planning Constraints

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### Site Boundary Plan

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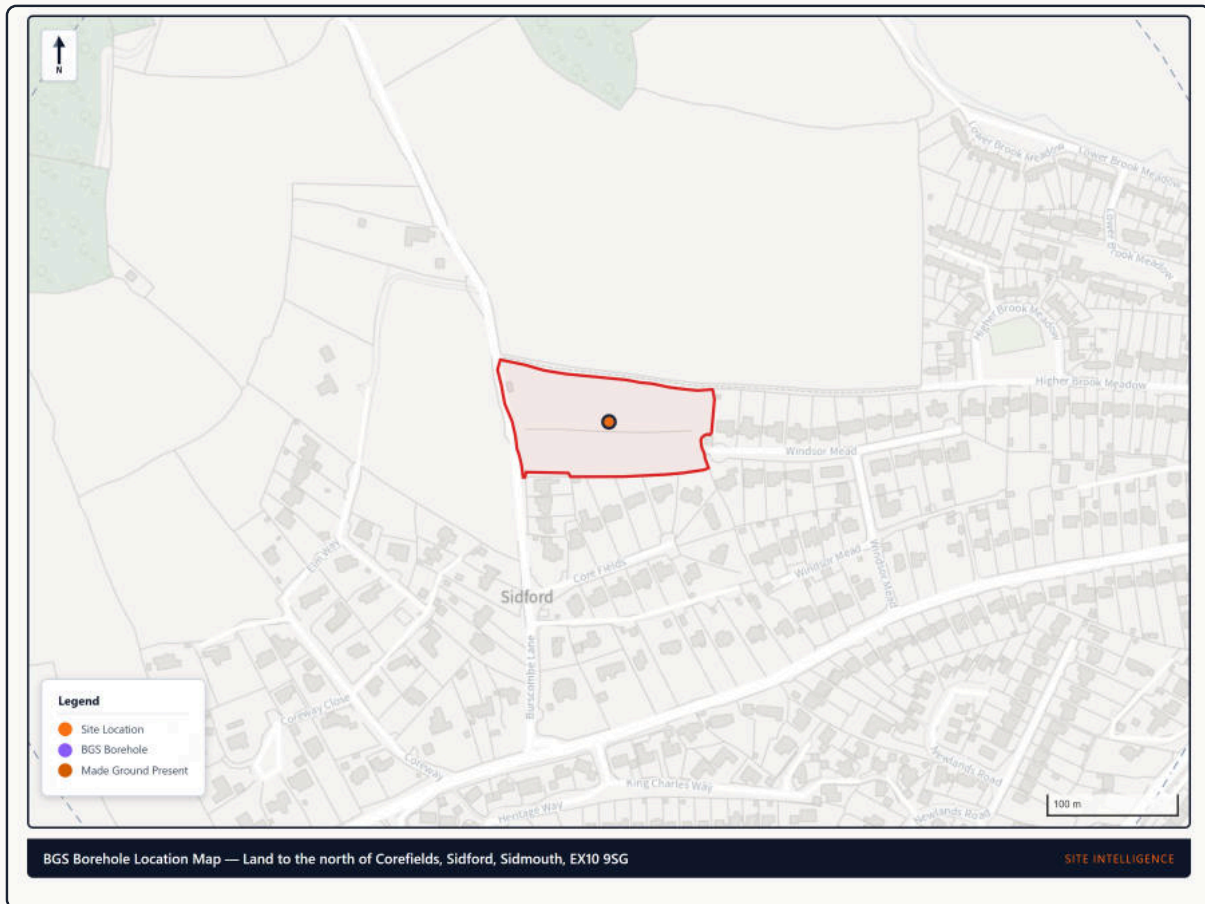


Planning History (Nearby Applications)  
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## 4.2 Landscape Character

National Character Area	147: Blackdowns
Landscape Character	

### 4.3 Ground Conditions



BGS Borehole Locations

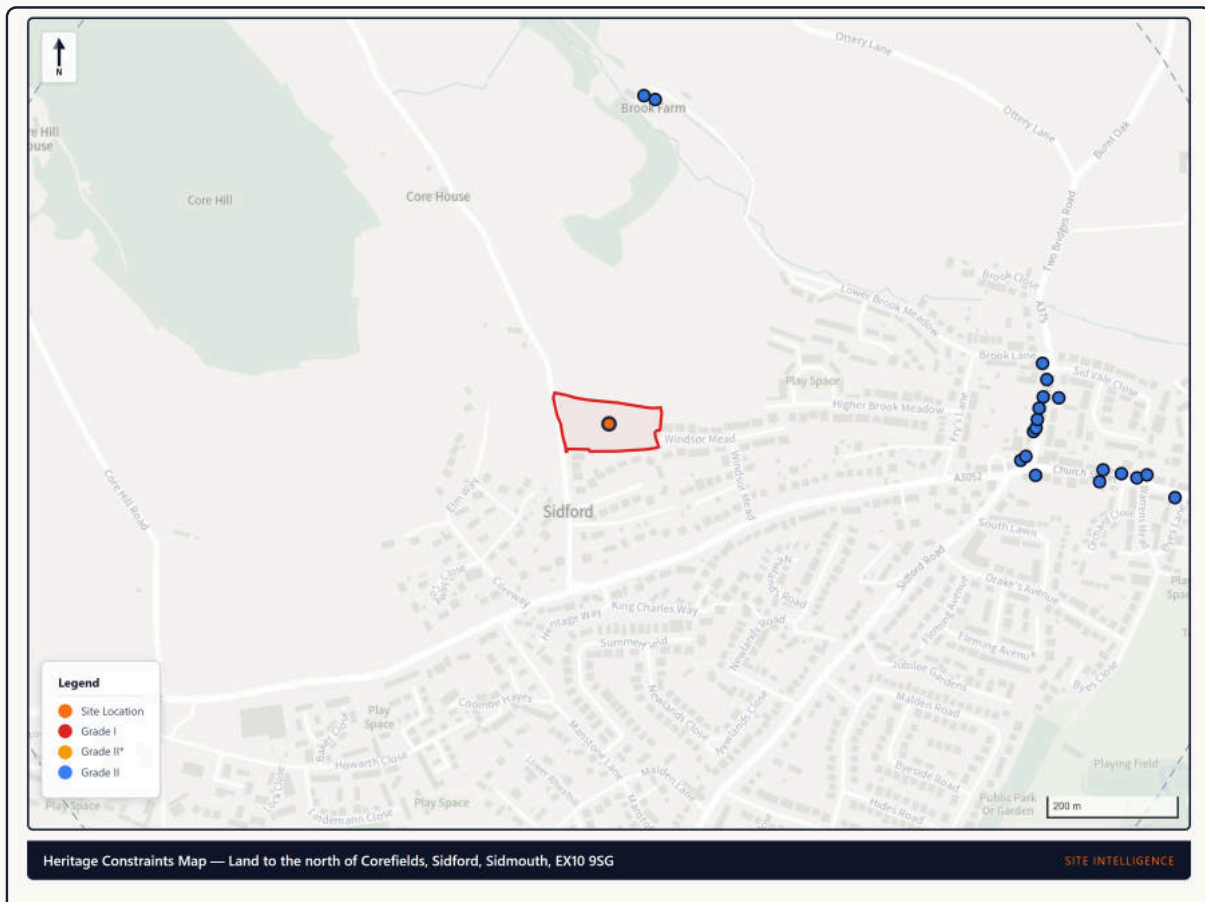
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<b>Bedrock Geology</b>	Sidmouth Mudstone Formation
<b>Superficial Deposits</b>	None recorded at this location
<b>Made Ground</b>	No made ground present
<b>Shrink-Swell Risk</b>	low

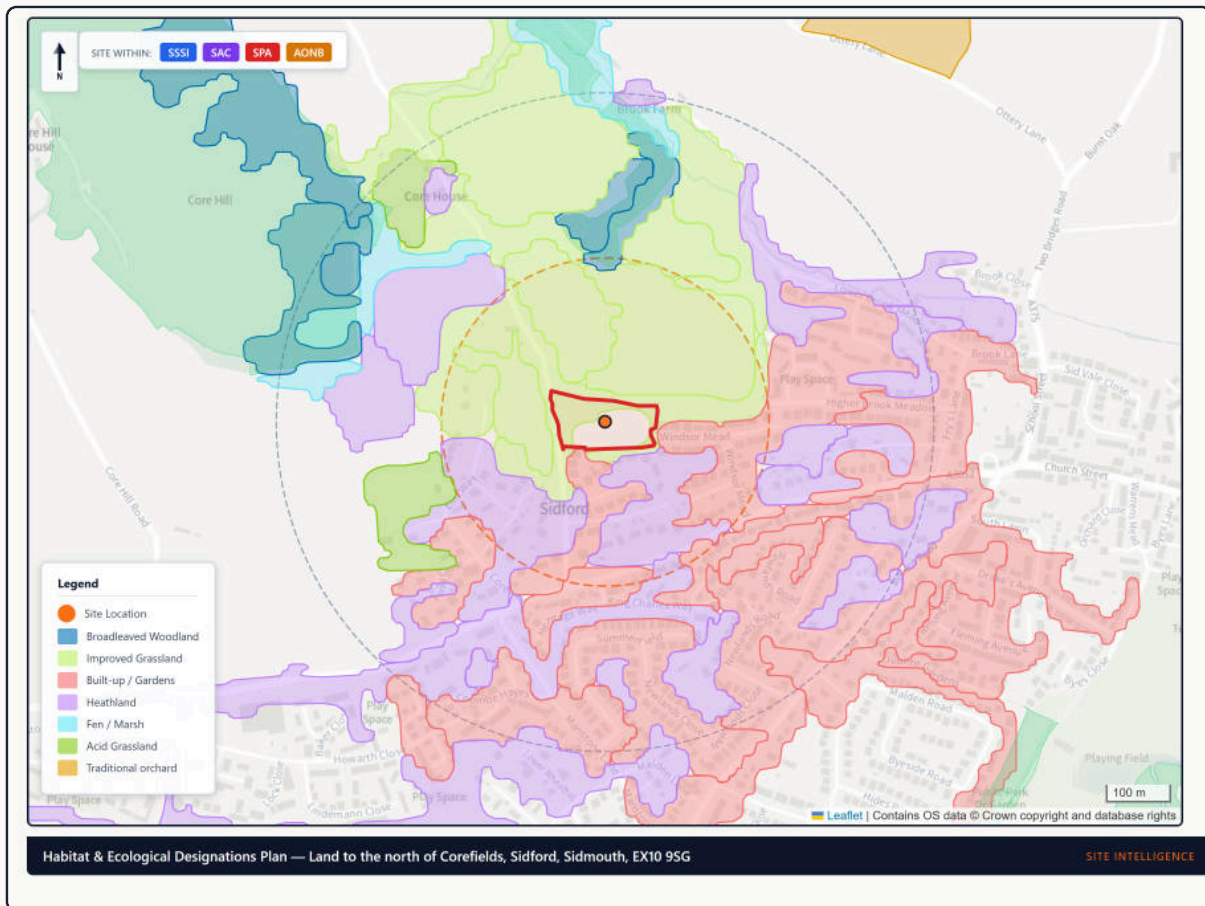
## 5 Site Constraints

The following constraints have been identified from desktop analysis including automated constraint detection across 23 environmental and planning datasets.

Constraint	Status
Conservation Area (on-site)	NO
Green Belt	NO
Listed Buildings (within 1km — setting catchment)	24 GRADE II/I/II*
Scheduled Monument (within 1km)	1 ADJACENT
AONB / National Landscape	YES
SSSI	NO
TPO Trees	NO
Flood Zone	ZONE 1
AQMA	NO



Heritage Constraint Map  
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Ecological Designations (SSSI, SAC, SPA, Ramsar)  
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### 5.1 Ecological Designations

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

### 5.2 Agricultural Land Classification

No Agricultural Land Classification grade is recorded for this site on the DEFRA MAGIC provisional ALC dataset. This typically indicates that the land is within or adjacent to an existing urban area and has not been classified for agricultural quality. The site is not Best and Most Versatile (BMV) agricultural land, and NPPF Dec 2024 paragraph 187(b) is not engaged.

## 6 Planning History

A search of the local planning authority's public register has been undertaken to identify relevant planning history for the application site and immediately surrounding area.

No planning applications were identified on the public register for the application site or immediate surroundings.

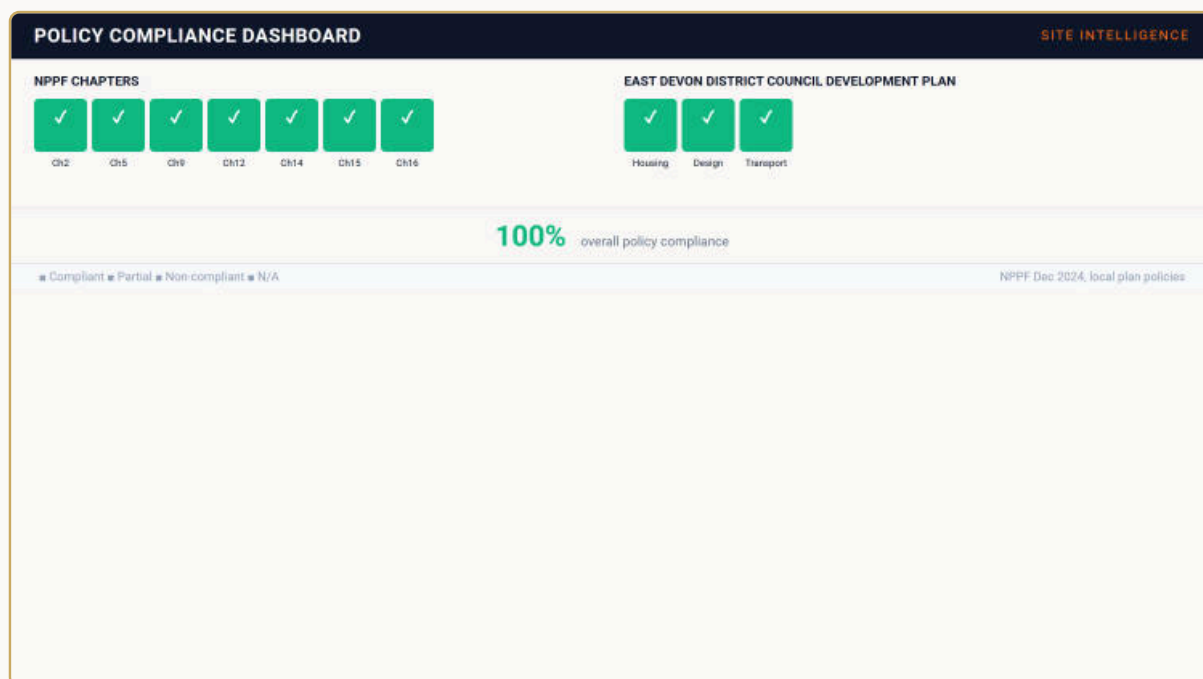
The adopted development plan comprises the East Devon Local Plan 2013-2031 (adopted 28 January 2016) and the made Sid Valley Neighbourhood Plan. The site lies outside the defined settlement boundary and is treated as countryside under the adopted spatial strategy, where new residential development is restricted. This tension forms the central policy question at Tier 1. The adopted plan exceeds five years old; its weight is affected by the supply position addressed below. The emerging East Devon Local Plan 2020-2040 has been submitted for examination with inspectors appointed. It proposes allocation Sidm\_31 over this land for housing. The NPPF ties emerging-policy weight to three tests: preparation stage, extent of unresolved objections, and Framework consistency. Examination stage supports moderate weight. However, allocation-specific objections and the pending outcome temper that assessment. Each test points to limited-to-moderate weight for Sidm\_31 until the inspectors report. The Sid Valley Neighbourhood Plan was made on 7 November 2019 with 90% referendum support and forms part of the development plan. Its Policy 3 protects the separation between Sidford and Sidbury. In *Suffolk Coastal District Council v Hopkins Homes Ltd* [2017] UKSC 37 the Supreme Court confirmed that neighbourhood plan housing policies fall within 'policies for the supply of housing'. The full made-plan text should be obtained for detailed assessment before submission.



Planning History Map

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## 7 Planning Policy Framework



Policy Dashboard

### 7.1 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.

#### 7.1.1 NPPF Paragraphs Engaged

The following NPPF paragraphs have been identified as relevant to the planning policy assessment of this proposal. Specialist NPPF chapters (heritage, ecology / biodiversity, flood risk) are addressed in their respective specialist reports.

NPPF Paragraph	Topic	Priority	Relevance
11(d)	Presumption in favour — tilted balance	CRITICAL	Tilted balance: adverse impacts of granting permission must significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
77	Five-year housing land supply requirement	HIGH	Identify and maintain a supply of deliverable and developable housing land for a minimum of five years.
footnote 7	Footnote 7 — designations displacing tilted balance	CRITICAL	Assess whether footnote 7 designations displace the tilted balance. Where displaced, the normal planning balance under 11(c) applies instead, and the specific NPPF policies protecting the designation take precedence.
7-10	Three dimensions of sustainable development	STANDARD	Assess development against the economic, social, and environmental objectives of sustainable development.
11(c)	Accordance with up-to-date development plan	CRITICAL	Proposals that accord with an up-to-date development plan should be approved without delay.
60-68	Delivering sufficient supply of homes	HIGH	Assess how the proposal contributes to delivering a sufficient supply of homes, including the mix of housing, affordable housing requirements, and housing type/tenure.
128-141	Achieving well-designed and beautiful places	STANDARD	Assess design quality against local design codes, design guides, and national design guidance. Good design is a key aspect of sustainable development.
124-127	Achieving appropriate densities	STANDARD	Assess whether the proposed density makes efficient use of land, having regard to local plan policies, the need for housing, local market conditions, and the desirability of maintaining an area's character and setting.
104-109	Promoting sustainable transport	STANDARD	Assess the site's accessibility by sustainable transport modes. Significant development should be focused on locations which are or can be made sustainable. Development should facilitate the use of sustainable transport modes.
114-115	Transport — development should only be prevented on highways grounds in	STANDARD	Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

NPPF Paragraph	Topic	Priority	Relevance
	specific circumstances		
131-135	Design — national design guidance and codes	STANDARD	Plans should set out a clear design vision and expectations. Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents.
136-139	Design — responding to context and local character	STANDARD	Proposals should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. Establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places.
140-141	Design — trees and landscaping	STANDARD	New streets should be tree-lined. Existing trees should be retained wherever possible. Appropriate measures should be in place to secure the long-term maintenance of newly planted trees.
85-91	Healthy and safe communities — social wellbeing	STANDARD	Planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles. Consider access to healthcare, education, and community facilities.
128-130	Design — plan-making expectations for design quality	STANDARD	Plans should set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations.
158-166	Climate change — planning for a changing climate	STANDARD	Plans should take a proactive approach to mitigating and adapting to climate change. New development should be planned for in ways that avoid increased vulnerability to climate change impacts and help reduce greenhouse gas emissions.
183-185	Natural environment — protecting and enhancing	STANDARD	Planning policies and decisions should contribute to and enhance the natural and local environment. Minimise impacts on and provide net gains for biodiversity. Prevent new and existing development from contributing to or being adversely affected by

NPPF Para-graph	Topic	Priority	Relevance
			unacceptable levels of soil, air, water or noise pollution.
38-48	Decision-making — material considerations	STANDARD	LPAs should approach decisions on proposed development in a positive and creative way. Work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Pre-application engagement is encouraged.
55-58	Decision-making — planning conditions and obligations	STANDARD	Planning conditions should be kept to a minimum, only imposed where necessary, relevant, enforceable, precise and reasonable. Planning obligations should only be sought where they meet the three tests at Regulation 122: necessary, directly related, fairly and reasonably related in scale and kind.

Source: NPPF (December 2024). 19 paragraphs shown (planning-policy scope only); specialist paragraphs are addressed in heritage / ecology / flood / landscape reports.

## 7.2 Local Policy

The desktop screen indicates the scheme is capable of compliance with the relevant development plan policies, subject to detailed design and the technical work scoped below. Final compliance is for the Tier 2 author.

Strategy 1, Strategy 2, Strategy 3 and Strategy 4 set the spatial strategy and balanced-communities aims. The site sits beyond the settlement boundary, so it currently conflicts with the adopted distribution. That conflict attracts reduced weight given the 2.97-year supply. Strategy 27 frames Sidford's role among the small towns and larger villages. Strategy 34 sets the district-wide affordable target; at 25% on-site this 15-dwelling scheme resolves to four affordable homes. Strategies 35 and 36, and Policies H1-H4, are engaged in principle.

Policies D1, D2 and D3, with Strategy 48, require local distinctiveness, landscape integration and tree retention. These are achievable through a contextual, cob-and-chert-informed layout. Policies D4, D7 and D8 have limited direct application. Sid Valley Neighbourhood Plan Policies 1 and 3 are central; the layout must protect the Sidford-Sidbury gap. Character assessment under these policies is a matter of planning judgement, as confirmed in *Gladman Developments Ltd v Secretary of State* [2021] EWCA Civ 104.

Strategy 38, Strategies 39 and 40, and Policies EN21 and EN22 are addressable through Future Homes Standard fabric, on-plot renewables, sustainable drainage and run-off control appropriate to a Flood Zone 1 site. An East Devon inspector (APP/U1105/W/21/3275285, appeal allowed) found an edge-of-Sidmouth site to be reasonably accessible and well related to services; the present site occupies a comparable edge-of-Sidford position.

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

### 7.3 Housing Land Supply

<p>HOUSING LAND SUPPLY</p> <p><b>2.97 years</b></p>	<p>FIVE-YEAR THRESHOLD</p> <p><b>NOT MET</b></p>
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**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 therefore engaged, meaning that planning permission shall be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

Tilted balance engaged — housing and settlement boundary policies out-of-date under NPPF. Refusal on these grounds alone is unlikely to be sustained at appeal.

### 7.4 Key Policy Compliance

The adopted development plan comprises the East Devon Local Plan 2013-2031 (adopted 28 January 2016) and the made Sid Valley Neighbourhood Plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires determination in accordance with that plan unless material considerations indicate otherwise.

The site lies outside the defined settlement boundary and is treated as countryside under the adopted spatial strategy, where new residential development is restricted. This tension forms the central policy question at Tier 1. The adopted plan exceeds five years old; its weight is affected by the supply position addressed below.

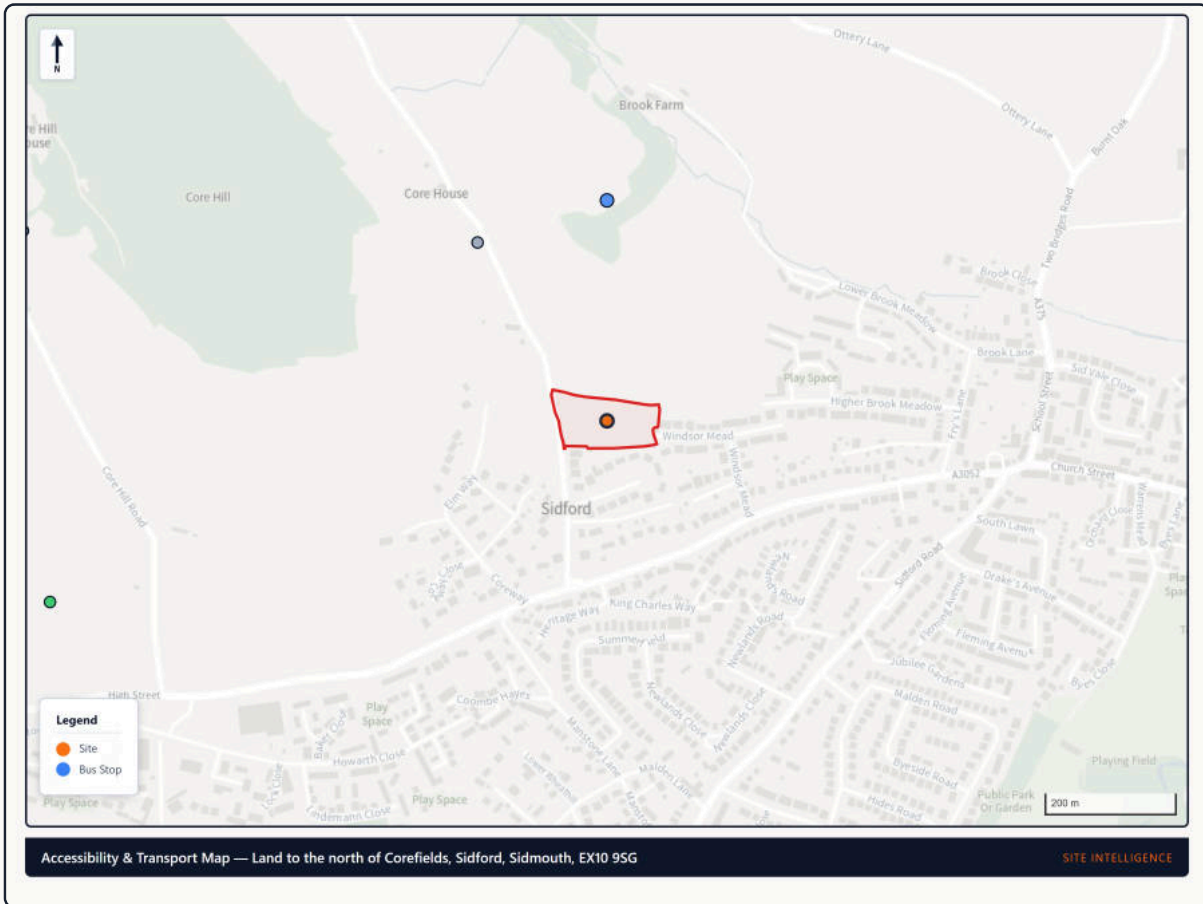
The emerging East Devon Local Plan 2020-2040 has been submitted for examination with inspectors appointed. It proposes allocation Sidm\_31 over this land for housing. The NPPF ties emerging-policy weight to three tests: preparation stage, extent of unresolved objections, and Framework consistency. Examination stage supports moderate weight. However, allocation-specific objections and the pending outcome temper that assessment. Each test points to limited-to-moderate weight for Sidm\_31 until the inspectors report.

The Sid Valley Neighbourhood Plan was made on 7 November 2019 with 90% referendum support and forms part of the development plan. Its Policy 3 protects the separation between Sidford and Sidbury. In *Suffolk Coastal District Council v Hopkins Homes Ltd* [2017] UKSC 37 the Supreme Court confirmed

that neighbourhood plan housing policies fall within 'policies for the supply of housing'. The full made-plan text should be obtained for detailed assessment before submission.

## 8 Sustainable Location Assessment

### 8.1 Transport Accessibility



Transport Accessibility & Local Amenities  
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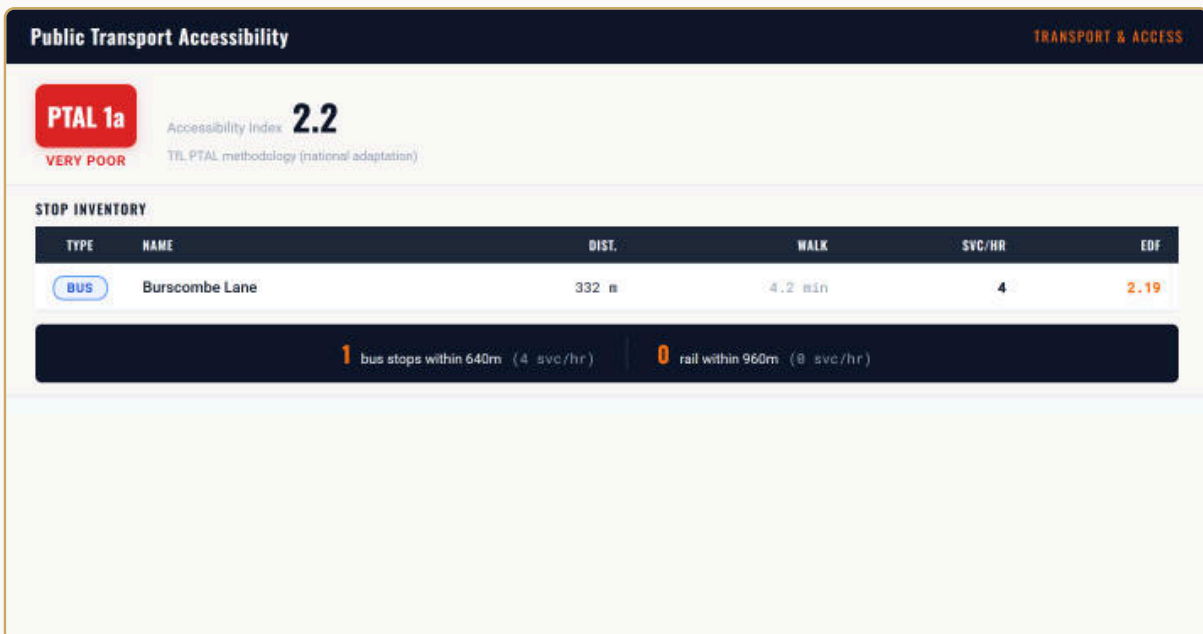


Chart — PTAL Score Breakdown

PTAL GRADE

**1a**

ACCESSIBILITY INDEX

**2.19**

The site achieves a PTAL grade of 1a, indicating very poor public transport accessibility. Limited public transport accessibility — the sustainability case for this location rests on settlement context and local amenity access rather than public transport provision. A low PTAL grade does not automatically render a location unsustainable, particularly where local services are accessible on foot or by cycle.

## 8.2 Amenity Provision

AMENITY SCORE

**47**

AMENITY GRADE

**D**

The site achieves an amenity proximity grade of D, confirming adequate access to local services including education, healthcare, retail, and leisure facilities. Whilst amenity access is adequate, it is not a strong indicator of locational sustainability and the sustainability case should be considered alongside other factors.

## 8.3 Housing Need

<b>Owner Occupied</b>	72.2%
<b>Private Rented</b>	16%
<b>Social Rented</b>	10.3%

Census 2021 data shows the local tenure mix, which provides context for the housing need analysis. The proposed development contributes to the range of housing required to meet identified local needs.

## 9 Tilted Balance Assessment

East Devon District Council cannot demonstrate a five-year supply of deliverable housing land (2.97 years). The tilted balance at NPPF Dec 2024 paragraph 11(d) is therefore engaged. This means that planning permission shall be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF taken as a whole.

HOUSING LAND SUPPLY <b>2.97 years</b>	SHORTFALL <b>2.03 years</b>	POLICY FRAMEWORK <b>Tilted Balance</b>
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### 9.1 Planning Balance (Tilted)

The following assessment applies the tilted balance, weighing the benefits of the proposal against any adverse impacts. The test is whether the adverse impacts **significantly and demonstrably** outweigh the benefits — a higher threshold than the standard planning balance.

The structured weights below are indicative inputs for the Tier 2 author, who will resolve the overall position once landscape, ecology, heritage and nutrient work is complete. Housing delivery against a 2.97-year supply carries substantial weight. The affordable element of four homes at 25% on-site carries significant weight, given an affordability ratio of 9.86. Emerging allocation Sidm\_31 carries considerable weight to the principle of residential use. Economic activity carries moderate weight. The minimum 10% biodiversity net gain carries limited weight as a statutory floor. The National Landscape duty under the NPPF is the principal constraint against which the supply benefit must be weighed at determination, pending the GLVIA3 assessment. The nutrient-neutrality gateway is a pre-determination legal requirement, resolved through Appropriate Assessment and a nutrient budget, rather than a balance weight. HRA screening must conclude no likely significant effect, in combination with other plans and projects, or proceed to Appropriate Assessment. The transport position should be confirmed by the transport author against the severe-impact test in the NPPF; a sustainable edge-of-Sidford location is not expected to breach it. The change-of-use appeal at APP/U1105/W/21/3275285 (allowed) supports that an edge-of-settlement site near Sidmouth can be reasonably accessible. No credible heritage-harm pathway is identified at desktop level. That framework will guide the Tier 2 resolution once the GLVIA3 is complete. Heritage (cross-reference). The heritage writer identifies a desktop-stage finding (LSS / a desktop-stage finding) to designated heritage assets. Under the NPPF-214 the identified harm must be weighed against the public benefits of the proposal. Paragraph 212 requires that great weight be given to the conservation of designated heritage assets; paragraph 213 (as set out in the heritage statement, which addresses the Chapter 16 heritage tests in detail) applies where harm is less than substantial, requiring the harm to be noted alongside the benefits of the scheme for the planner's balanced consideration including securing the optimum viable use. Site visit confirmation of individual asset settings is recommended before the balance is finalised.

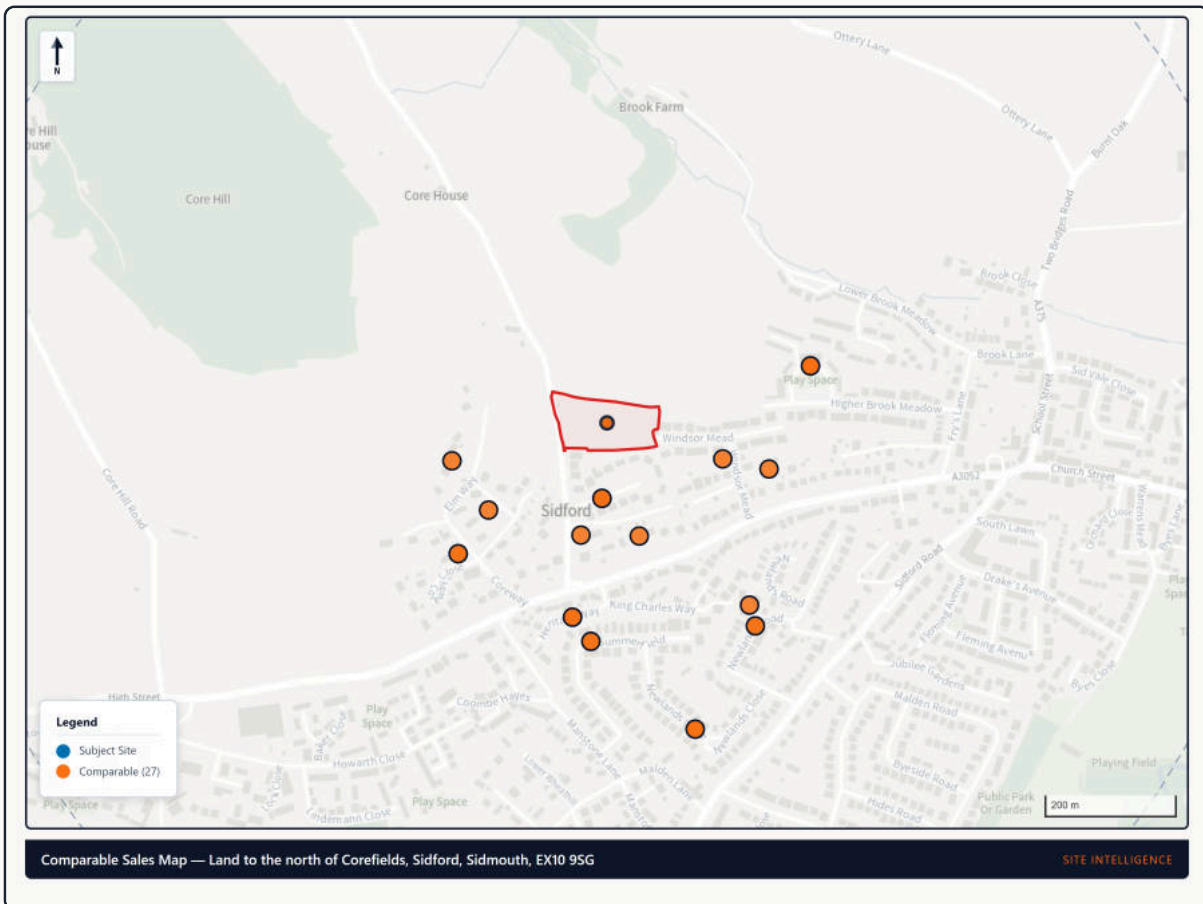
**Evidence Focus Areas**

Based on the appeal decision record for this LPA, the following constraint areas require particularly thorough evidencing in this submission:

- **Listed building:** Elevated appeal activity — ensure comprehensive policy compliance and technical evidence

**Housing Affordability Context**

The local authority area experiences above-average housing affordability pressure. The delivery of new housing in such areas can carry material weight as a public benefit; the scale and form of any affordable housing contribution should be assessed at Tier 2 against the relevant LPA policy threshold, viability evidence and any payment-in-lieu approach.



Comparable Sales Evidence  
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**10 Conclusions**

The Sid Valley Neighbourhood Plan was made on 7 November 2019 with 90% referendum support and forms part of the development plan.

- The proposal is for 15 dwellings at Land to the north of Corefields, Sidford, Sidmouth, EX10 9SG

- The tilted balance is engaged (2.97 years HLS) — NPPF Dec 2024 paragraph 11(d) applies

### Indicative Conclusion (Desktop Strategy Stage)

Subject to completion and confirmation of the specialist evidence base (LVIA, heritage setting assessment where listed buildings are within or near the site, HRA screening for any European sites within the zone of influence, FRA where the site engages flood risk, and any nutrient or catchment-specific assessment), the benefits of the proposal — including the delivery of 15 dwellings towards a housing land supply position of 2.97 years (a deficit of 2.03 years against the five-year requirement) — are considered to have a sound case for the tilted balance at NPPF paragraph 11(d) to fall in their favour. A definitive recommendation to grant must follow completion of that specialist evidence base.

### Evidence Completeness Declaration

This Planning Strategy Statement has been prepared to inform pre-submission decision-making at the desktop strategy stage. It identifies the principal planning risks, evidence gaps and recommended specialist workstreams. It is not a submission document. The strategy and evidence routes set out below should be progressed at Tier 2 specialist stage and the document should be verified by an MRTPI-qualified planner before reissue as a submission-ready Planning Statement.

### Client decision — recommended next step

**Do not proceed directly to planning submission on the basis of this Desktop Review.** This document is a Tier-2 desktop strategy report — it identifies the right battlegrounds, but the submission-defensible evidence base has not yet been built.

Before formal submission, the following specialist evidence should be commissioned:

- Heritage Impact Assessment (GPA3 five-step setting analysis + verified views)
- Landscape and Visual Impact Assessment (GLVIA3 three-stage)

Once the specialist evidence base is complete and the report has been verified by an MRTPI-qualified planner, the document can be reissued as a submission-ready Planning Statement.

### Case Officer — Anticipated Questions

#### Q. Which NPPF version has been applied?

A. NPPF December 2024. Paragraph 11(d) applies where the adopted plan is out-of-date or the LPA cannot demonstrate a five-year housing land supply. Footnote 7 defines the trigger.

#### Q. On what basis is section 38(6) of the Planning and Compulsory Purchase Act 2004 applied?

A. The statutory duty requires the application to be determined in accordance with the development plan unless material considerations indicate otherwise. NPPF as the principal material consideration is given significant weight; emerging policy weight is moderated by stage and unresolved objections per NPPF Dec 2024 paragraph 48

**Q. Has the tilted balance been considered?**

A. Yes. It engages only where NPPF Dec 2024 paragraph 11(d) triggers apply (out-of-date plan or <5YHLS or <75% HDT). Where engaged, the presumption in favour of sustainable development applies unless the adverse impacts significantly and demonstrably outweigh the benefits.

**Q. How have heritage impacts been weighted?**

A. NPPF paragraphs 212 (great weight to conservation) and 215-216 (LTSH / substantial-harm balance) have been applied. Significance and setting use Historic England GPA3 (2017) five-step methodology.

**Q. What weight has been given to appeal decisions cited?**

A. Appeal decisions are referenced as material considerations of persuasive, not binding, weight per standard planning case law. Citations include BAILII or PINS links so the inspector's reasoning is verifiable.

## 11 Known Limitations and Assumptions — Planning-Statement-Specific

This planning statement does NOT include the following items unless separately commissioned.

- Pre-application meeting with the Local Planning Authority case officer
- Verified five-year housing land supply position from the LPA
- Independent housing-needs assessment to PPG paragraph 010 standard
- Detailed site-specific Sequential Test or Exception Test analysis (where flood zones engaged)
- Verbatim review of every saved local-plan policy (we cite the operative policies; the LPA may apply additional non-saved policies at determination)
- Member-level political appraisal of the application; all weighting in this report is a planning-officer-style assessment
- Site walkover or photographic survey of the development context
- Counsel's opinion on any contested point of planning law

## 12 General Desktop Limitations

### 12.1 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

### 12.2 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

### 12.3 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

## 12.4 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)

## 12.5 Changes That Would Require Update

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

- Revised NPPF published (current version: December 2024)
- Local Plan review or update adopted
- Five-year housing land supply position changes materially
- Emerging Local Plan reaches Regulation 19 or examination stage
- Relevant appeal decisions establish new material considerations
- Scheme description changes from that assessed
- Grey Belt policy updated or further case law clarifies classification criteria (NPPF Dec 2024 paras 142-155)
- Viability assessment guidance updated (current: PPG Viability and RICS Financial Viability in Planning, 1st edition 2021)

- HMO conversion — Gravesham test for dwellinghouse classification  
(Gravesham BC v SSE (1984) 47 P&CR 142)
- HMO = dwellinghouse, PD rights retained  
(LB Brent v SSLUHC [2022] EWHC 2051)
- Concealment prevents immunity — proper authorisation required  
(Welwyn Hatfield BC v SSCLG [2011] UKSC 15)
- S106 'real connection' test — each obligation must relate to development (Newbury three-part test)  
(R (Sainsbury's) v Wolverhampton [2010] UKSC 20)
- Standard of review — planning judgment is Wednesbury rationality, not correctness  
(R (Dill) v SSHCLG [2020] UKSC 20)
- HLS methodology — Sedgefield/Liverpool both valid; planning judgment not mathematical  
(Barwood v East Staffordshire [2017] EWCA Civ 893)
- Adequacy of reasons — read benevolently, intelligible and adequate, not exhaustive  
(R (Mansell) v Tonbridge [2017] EWCA Civ 1314)

### 13 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.

#### 13.1 Internal Data Coverage Summary

Metric	This Report	Typical Stage 1 Desktop Scope
Data sources consulted	66	3 – 8
Constraint categories checked	38	5 – 10
Data sources queried	66	0 – 2
Provenance entries recorded	66	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.*

#### 13.2 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

## 14 Anticipated Consultee Queries

The following statutory and non-statutory consultees are anticipated to respond to the application. For each, we identify the likely trigger for consultation, expected turnaround, probable questions or concerns, and conditions that may be imposed.

### Local Plans Team

Trigger: All major applications  
Turnaround: 21 days

#### Likely Questions:

- Does the proposal comply with adopted Local Plan policies?
- Has the emerging Local Plan been considered?
- Is the site allocated in the development plan?
- Has the 5-year housing land supply position been addressed?
- Does the tilted balance apply (NPPF para 11d)?
- Have material considerations been properly weighed?

#### Objection Triggers:

- Conflict with adopted development plan
- Failure to address key material considerations

## 15 Update Triggers

**Validity Period: 6 months from date of issue, or until next NPPF revision.**

Planning Strategy Statement — Desktop Review is valid for 6 months from date of issue, or until next NPPF revision. 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.

- Revised NPPF published (current version: December 2024)
- Local Plan review or update adopted
- Five-year housing land supply position changes materially
- Emerging Local Plan reaches Regulation 19 or examination stage
- Relevant appeal decisions establish new material considerations
- Scheme description changes from that assessed
- Grey Belt policy updated or further case law clarifies classification criteria (NPPF Dec 2024 paras 142-155)
- Viability assessment guidance updated (current: PPG Viability and RICS Financial Viability in Planning, 1st edition 2021)

- HMO conversion — Gravesham test for dwellinghouse classification

(Gravesham BC v SSE (1984) 47 P&CR 142)

- HMO = dwellinghouse, PD rights retained

(LB Brent v SSLUHC [2022] EWHC 2051)

- Concealment prevents immunity — proper authorisation required

(Welwyn Hatfield BC v SSCLG [2011] UKSC 15)

- S106 'real connection' test — each obligation must relate to development (Newbury three-part test)

(R (Sainsbury's) v Wolverhampton [2010] UKSC 20)

- Standard of review — planning judgment is Wednesbury rationality, not correctness

(R (Dill) v SSHCLG [2020] UKSC 20)

- HLS methodology — Sedgefield/Liverpool both valid; planning judgment not mathematical

(Barwood v East Staffordshire [2017] EWCA Civ 893)

- Adequacy of reasons — read benevolently, intelligible and adequate, not exhaustive

(R (Mansell) v Tonbridge [2017] EWCA Civ 1314)

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.

## 16 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.

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### 3. Third-Party Exclusion

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### 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-statement 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.

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### **12. Mortgage / Valuation / Purchaser Exclusion**

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### **13. Report Validity Period**

This report is valid for a period of 6 months from date of issue, or until next NPPF revision 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.

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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.

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#### **Product-Specific Note**

This Planning Strategy Statement — Desktop Review 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 <a href="https://flood-map-for-planning.service.gov.uk">https://flood-map-for-planning.service.gov.uk</a>	Environment Agency	Flood zones, surface water risk, historic floods	2024 Q4 / Quarterly	2026-04-11
National Heritage List for England <a href="https://historicengland.org.uk/listing/the-list">https://historicengland.org.uk/listing/the-list</a>	Historic England	Listed buildings, scheduled monuments, registered parks	Continuously updated / Continuous	2026-04-11
MAGIC Interactive Map <a href="https://magic.defra.gov.uk">https://magic.defra.gov.uk</a>	Natural England / DEFRA	SSSIs, SACs, SPAs, Ramsar sites, NNRS	Continuously updated / Continuous	2026-04-11
Multi-source constraint detection <a href="https://magic.defra.gov.uk">https://magic.defra.gov.uk</a>	Various (38 datasets, deduped to 36 + Flood Zone)	Green Belt, AONB, conservation areas, TPOs, flood zones	Mixed (see per-dataset) / Mixed	—
Census 2021 <a href="https://www.ons.gov.uk/census">https://www.ons.gov.uk/census</a>	Office for National Statistics	Population, demographics, housing tenure, travel patterns	2021 / Every 10 years	2026-04-11
PTAL Calculation (TfL TN14) <a href="https://data.london.gov.uk/dataset/public-transport-accessibility-levels">https://data.london.gov.uk/dataset/public-transport-accessibility-levels</a>	Site Intelligence™ (TfL methodology)	Public transport accessibility index and grade	TN14 methodology (2015+) / Per retrieval (timetable-live)	2026-04-11
OpenStreetMap / Overpass <a href="https://www.openstreetmap.org">https://www.openstreetmap.org</a>	OpenStreetMap Contributors	Amenity proximity: schools, GPs, shops, transport stops	Continuously updated / Continuous	2026-04-11
BGS Geology of Britain <a href="https://mapapps.bgs.ac.uk/geologyofbritain/home.html">https://mapapps.bgs.ac.uk/geologyofbritain/home.html</a>	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
<a href="https://www.gov.uk/government/statistical-data-sets/price-paid-data-downloads">https://www.gov.uk/government/statistical-data-sets/price-paid-data-downloads</a>				
<b>ONS Housing Affordability</b> <a href="https://www.ons.gov.uk/peoplepopulationandcommunity/housing">https://www.ons.gov.uk/peoplepopulationandcommunity/housing</a>	Office for National Statistics	Affordability ratios, private rents, house prices	Latest annual release / Annual	2026-04-11
<b>Agricultural Land Classification</b> <a href="https://magic.defra.gov.uk">https://magic.defra.gov.uk</a>	Natural England	Provisional ALC grade, best & most versatile status	Provisional (1960s-80s baseline) / Very infrequent	2026-04-11
<b>National Character Area Profiles</b> <a href="https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making">https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making</a>	Natural England	Landscape character assessment and key characteristics	2013 (NCA profile set) / Very infrequent	2026-04-11
<b>DfT Road Traffic Statistics</b> <a href="https://roadtraffic.dft.gov.uk">https://roadtraffic.dft.gov.uk</a>	Department for Transport	Annual average daily traffic counts	Annual (latest available) / Annual	2026-04-11
<b>STATS19 Road Accident Data</b> <a href="https://www.data.gov.uk/dataset/cb7ae6f0-4be6-4935-9277-47e5ce24a11f/road-safety-data">https://www.data.gov.uk/dataset/cb7ae6f0-4be6-4935-9277-47e5ce24a11f/road-safety-data</a>	Department for Transport	Road traffic collisions and casualties	Annual (latest available) / Annual	2026-04-11
<b>DEFRA Background Air Quality</b> <a href="https://uk-air.defra.gov.uk/data/laqm-background-maps">https://uk-air.defra.gov.uk/data/laqm-background-maps</a>	DEFRA	Background NO2, PM10, PM2.5 concentrations	Annual map set (latest modelled year) / Annual	2026-04-11
<b>DEFRA AQMA Boundaries</b> <a href="https://uk-air.defra.gov.uk/aqma/maps">https://uk-air.defra.gov.uk/aqma/maps</a>	DEFRA	Air Quality Management Area designations	Continuously updated / Continuous	2026-04-11
<b>EA LIDAR Data</b> <a href="https://environment.data.gov.uk/DefraDataDownload/?Mode=survey">https://environment.data.gov.uk/DefraDataDownload/?Mode=survey</a>	Environment Agency	Terrain elevation, DSM/DTM coverage	LIDAR Composite (latest available tile) / Per acquisition programme	2026-04-11
<b>DNO Long Term Development Statement</b> Contact provider for verification	Distribution Network Operator	Electrical grid capacity and connection assessment	Latest LTDS (per DNO) / Annual	2026-04-11
<b>LPA Planning Portal</b> 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	<a href="https://www.gov.uk/government/publications/national-planning-policy-framework--2">https://www.gov.uk/government/publications/national-planning-policy-framework--2</a>
Planning Practice Guidance	DLUHC	Online (continuously updated)	<a href="https://www.gov.uk/government/collections/planning-practice-guidance">https://www.gov.uk/government/collections/planning-practice-guidance</a>
Planning (Listed Buildings and Conservation Areas) Act 1990	UK Parliament	As amended	<a href="https://www.legislation.gov.uk/ukpga/1990/9/contents">https://www.legislation.gov.uk/ukpga/1990/9/contents</a>

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.

Report generated by Site Intelligence™, PF & Co Holdings Ltd. Data sources queried automatically from public datasets. Verification URLs link to the authoritative public data source where the underlying data can be independently confirmed.

PREPARED FOR **Sample Client**

PREPARED BY

**Site Intelligence**

PF &amp; Co Holdings Ltd

Date of Issue: **10 May 2026**  
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**PlanningStatement-R01**  
Revision: **R01**

FOR AND ON BEHALF OF

**Site Intelligence™**

PF &amp; Co Holdings Ltd

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