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# Pre-Application Enquiry

## Applicant Briefing Pack

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

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

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# 1 Abbreviations

Abbreviation	Definition
CIL	Community Infrastructure Levy
DMP	Development Management Procedure Order 2015
EIA	Environmental Impact Assessment
LPA	Local Planning Authority
LURA	Levelling-Up and Regeneration Act 2023
NPPF	National Planning Policy Framework
PINS	Planning Inspectorate
PPA	Planning Performance Agreement
PPG	Planning Practice Guidance
S106	Section 106 Agreement (Town and Country Planning Act 1990)
SAC	Special Area of Conservation
SPA	Special Protection Area
SPD	Supplementary Planning Document
TCPA	Town and Country Planning Act 1990

## 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:

<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.

### 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.

### 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.

## 3 Cover Letter

To: The Planning Department, East Devon District Council

Dear Sir / Madam,

### Re: Pre-Application Enquiry — Land to the north of Corefields, Sidford, Sidmouth, EX10 9SG

We act for the applicant in connection with the proposed development described in this enquiry pack and are pleased to submit it for the Council's consideration. The enquiry relates to: *Residential development for up to 15 dwellings*.

We seek the Council's pre-application advice on the principle of the proposed development, the policy framework that the Council considers most material, and the validation list applicable to the eventual formal application. The applicant's initial planning position is set out within the Development Plan Policy Assessment section below, and the specific numbered questions for the case officer are set out in the dedicated Specific Numbered Questions section towards the end of this pack, alongside a Council Response Requested table.

We confirm the level of service requested in the Applicant Team and Service Requested section. The pre-application fee will be paid against the Council's currently-published pre-application fee schedule on confirmation of the service level (statutory basis: Local Government Act 2003 s.93 cost-recovery — PPG Reference ID 20-004). Contact details for the Council's response are set out below. We would welcome the opportunity to discuss this enquiry at a pre-application meeting where this is a service the Council offers for schemes of this scale.

Yours faithfully,

Site Intelligence — a service of PF & Co Holdings Ltd

<b>Site Address</b>	Land to the north of Corefields, Sidford, Sidmouth, EX10 9SG
<b>Local Planning Authority</b>	East Devon District Council
<b>Pre-Application Reference</b>	To be assigned by the Council
<b>Document Reference</b>	999-DEMO-2026 -PFCO-REP-PreApp-R01
<b>Date</b>	10 May 2026
<b>Applicant</b>	Sample Client
<b>Agent</b>	Site Intelligence — a service of PF & Co Holdings Ltd
<b>Agent Email</b>	info@pfandco.co.uk

## 4 Executive Summary

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**

SITE AREA

**1.08 ha**

SCHEME CLASS

**Major**

## 5 Applicant Team and Service Requested

<b>Applicant</b>	Sample Client
<b>Lead Agent</b>	Site Intelligence — a service of PF & Co Holdings Ltd
<b>Service Requested</b>	Written advice + officer meeting (or PPA where the Council prefers)
<b>Pre-Application Fee</b>	To be confirmed against the Council's currently-published pre-application fee schedule (statutory basis: Local Government Act 2003, s.93 cost-recovery — PPG Reference ID 20-004)
<b>Statutory Determination Period</b>	13 weeks (Article 34 DMPO 2015 — major development)

**Pre-application advice is not binding** — per PPG Reference ID 20-011, pre-application advice cannot pre-empt democratic decision-making. Any subsequent formal application will be determined on its merits in accordance with the development plan and material considerations per PCPA 2004 s.38(6) and TCPA 1990 s.70(2).

## 6 Site Description

Site Address	Land to the north of Corefields, Sidford, Sidmouth, EX10 9SG
Postcode	EX10 9SG
Local Planning Authority	East Devon District Council
Ward	Sidmouth Rural
Site Area	1.08 hectares
Existing Use	Agricultural field

## 7 Planning History

The relevant planning history for the application site and the immediate area is set out below. Material outcomes (refusals, dismissed appeals, costs awards) and patterns of recent decision on similar sites in the Council's area are summarised where they have a bearing on the principle of the proposed development.

Planning history desk research has not identified material applications on the site within the period reviewed. The eventual formal application will set out the planning history position confirmed at submission.

## 8 Constraints Inventory

The following statutory and non-statutory constraints have been identified for the application site. Each is stated with its implication for the proposed development — not merely listed.

Constraint	Status	Implication	Source
Green Belt	No constraint identified on dataset reviewed	—	planning.data.gov.uk
Conservation Area	No constraint identified on dataset reviewed	—	planning.data.gov.uk
Listed Building (within / setting)	Setting may be engaged	25 designated assets in wider context;	Historic England NHLE

Constraint	Status	Implication	Source
	— officer confirmation requested	setting impact may engage s.66(1); proportionate Heritage Statement scope to be confirmed by the Council.	
Flood Zone	Zone 1	Sequential test not engaged on EA Flood Zone classification; surface-water management remains relevant — SuDS strategy with the formal application.	Environment Agency Flood Map for Planning
AONB / National Landscape	Engaged on dataset reviewed	NPPF Dec 2024 paragraphs 187 to 189 engaged; great-weight duty attaches to landscape and scenic-beauty conservation under LURA 2023.	planning.data.gov.uk (LURA 2023 naming)
Article 4 Direction	to be confirmed against LPA mapping	Officer confirmation requested.	LPA mapping
SPA / SAC (proximity)	Engaged on dataset reviewed	European-site proximity flagged; LSE screening required under Conservation of Habitats and Species Regulations 2017 — mitigation cannot be assumed at screening (People Over Wind, CJEU C-323/17). Natural England consultation pathway likely.	Natural England MAGIC
TPO (on site)	No constraint identified on dataset reviewed	BS 5837 survey to be undertaken if any existing trees / hedges are affected by the eventual layout.	LPA mapping

Constraint readings reflect the cited public-dataset evidence at the date of issue. The applicant invites the Council to confirm any site-specific constraints not surfaced by these datasets. The dedicated officer questions are set out below at the Specific Numbered Questions section.

## 9 Proposal Description

**Applicant's Working Proposition.** This section sets out the working proposition at the parameter stage — the proposal scale, working assumptions, and the primary pre-application issue. Detailed architectural layouts, elevations and access geometry are intentionally reserved for the architect's RIBA Stage 3 design response, which will follow the Council's pre-application advice. The applicant's intention is to confirm the planning policy pathway and proportionate validation expectations **before** committing further design resource.

<b>Proposal</b>	Residential development for up to 15 dwellings
<b>Proposed Units</b>	Up to 15 (working scheme; final mix to be confirmed at the architect's design stage)
<b>Application Route</b>	Pre-Planning Application
<b>Use Class</b>	C3
<b>Development Type</b>	Outline — residential development
<b>Indicative Heights</b>	to be confirmed at parameter-plan stage; subject to character / topography review
<b>Indicative Density (gross)</b>	13.89 dph (gross)
<b>Architectural Layouts / Drawings</b>	Reserved for the architect's design-stage response following the Council's pre-application advice
<b>Primary Pre-Application Issue</b>	Principle of development, applicable policy framework, and proportionate validation requirements

## 10 Permitted Development assessment

### PERMITTED DEVELOPMENT NOT ASSESSED AT DESKTOP STAGE

Permitted development rights have not been assessed at this Tier-1 desktop stage. The proposal is understood to involve new residential development and is expected to require a full planning application. No reliance should be placed on permitted development rights unless separately reviewed at Tier 2.

### 10.1 What to do

- Confirm the route by full planning application is appropriate for the proposed scheme.
- Where a change-of-use or extension element later emerges, request a Tier-2 permitted-development screen against the consolidated GPDO 2015 (SI 2015/596) as amended.
- The eight Classes considered at a full PD screen, plus the explicit "trap" patterns recognised, are listed in the Limitations and scope block below.

### 10.2 Recommended route (provisional)

Full planning application. Application fee: £609 per dwelling for major housing applications, £258 per dwelling for minor (1-9 dwellings). Statutory determination period: 13 weeks for major applications, 8 weeks for minor.

### 10.3 Limitations and scope

This permitted-development assessment is a screen against the consolidated GPDO 2015 (SI 2015/596) as amended through SI 2024/579 (May 2024). It is not a substitute for legal advice or a chartered planner's formal opinion. The applicant's solicitor or planning consultant retains responsibility for the formal submission and any condition-discharge or appeal arguments. Planning application fees, prior-approval fees and statutory determination periods quoted in this section are stated as in force at the date of this report under the Town and Country Planning (Fees for Applications) (England) Regulations 2012 (as amended). The current schedule should be confirmed against the Planning Portal fee calculator ([planningportal.co.uk](https://planningportal.co.uk)) immediately before submission, as MHCLG amends the Regulations from time to time. Where this section refers to flood risk, listed buildings, conservation areas, scheduled monuments, AONB / National Landscape, National Park, World Heritage Site, the Broads, SSSI, Article 4 directions, or any other constraint, those values are drawn from the project's existing constraint review ([planning.data.gov.uk](https://planning.data.gov.uk) + EA flood-map + LPA designations). Detail and verification of each constraint sit in the Constraints section earlier in this report; relevant constraints should be cross-checked against the heritage, flood-risk and transport sections of this report where applicable.

## 11 Development Plan Policy Assessment

The development plan for the area comprises the adopted Local Plan. Policies are cited below by reference number and title, weighted by adoption date per NPPF Dec 2024 paragraphs 232 and 233. Where a Neighbourhood Plan forms part of the development plan under PCPA 2004 s.38(3), its policies are likewise cited individually. The statutory framework for plan-led decision-making is PCPA 2004 s.38(6) — determinations must be made in accordance with the plan unless material considerations indicate otherwise.

<b>Adopted Local Plan</b>	East Devon Local Plan 2013-2031 (Adopted)
<b>Plan Period</b>	to be confirmed against the Council's adopted Local Plan
<b>Neighbourhood Plan</b>	Sid Valley Neighbourhood Plan (Made November 2019)
<b>Housing Delivery Test</b>	118% (HDT 2023) — 5% buffer applies to 5-year supply
<b>Five-Year Housing Land Supply</b>	2.97 years

### 10.1 Applicant's Initial Planning Position

The applicant's initial assessment of the desktop evidence suggests the proposal may be capable of support, subject to the Council's confirmation on key matters identified below. This section is offered to **frame the pre-application conversation** — it does not commit the applicant to a particular planning argument and it does not contest any Local Plan or NPPF Dec 2024 policy. It is shared so that the Council and the applicant start from a common understanding of the material considerations **before** significant design resource is committed.

Matter	Applicant's initial interpretation	Council response requested
Principle of development	On the desktop evidence reviewed the proposal is small-scale residential development; the applicant's initial position is that the principle may be acceptable subject to settlement-relationship and countryside-policy considerations.	Confirm the policy position on the principle of development in this location, having regard to the development plan and material considerations.
National Landscape / AONB	Site is within / adjacent to a designated National Landscape on the dataset reviewed; NPPF Dec 2024 paragraphs 187 to 189 and the LURA 2023 great-weight duty are engaged.	Confirm the level of landscape and visual evidence the Council expects with the formal application.
Heritage (setting)	No designated heritage asset is recorded on the application site; the setting of nearby asset(s) may be engaged (s.66(1) and s.72(1) Listed Buildings and Conservation Areas Act 1990).	Confirm whether a Heritage Statement is required and the appropriate scope (setting only / detailed / Townscape & Visual Impact assessment).

Matter	Applicant's initial interpretation	Council response requested
Highways and access	Access strategy and visibility plays are reserved for the architect / transport consultant at design stage; current desktop review identifies no in-principle highway-safety concern beyond the access standard.	Confirm whether a Stage-1 Road Safety Audit, transport statement or junction-visibility evidence is required at the formal-application stage.
Drainage and flood risk	Site is recorded in Flood Zone 1 on the EA Flood Map for Planning; surface-water management remains a material consideration and a SuDS strategy will be developed for the formal application.	Confirm the Council's expectations for the FRA (where engaged) and the Lead Local Flood Authority's surface-water-drainage requirements.
Ecology and Biodiversity Net Gain	Site has ecological-sensitivity flags on the dataset reviewed; a Preliminary Ecological Appraisal and the statutory BNG metric will accompany the formal application.	Confirm survey-window and metric-version expectations for the formal application.
Habitats Regulations Assessment	European-site interaction or nutrient-neutrality catchment recorded on the dataset reviewed; a Likely Significant Effect screening (per Conservation of Habitats and Species Regulations 2017 and People Over Wind, CJEU C-323/17) will accompany the formal application.	Confirm whether SAMP / SANG mitigation contributions or a project-level Appropriate Assessment are required.
Validation requirements	The applicant is committed to a proportionate validation pack per NPPF Dec 2024 paragraph 45 and the Council's published local list.	Confirm the full local-list items the Council requires for an application of this scale.

The above is offered as the applicant's initial interpretation of the material considerations identified by desktop evidence; it does not pre-empt the Council's view on policy weight or interpretation, and the Council's response is requested in writing.

## 10.2 Applicant's Planning Case

The applicant's case is that the proposal may be capable of support, having regard to the development plan and material considerations. The applicant accepts the statutory framework set out in PCPA 2004 s.38(6) and TCPA 1990 s.70(2), and seeks the Council's view on the principle, the most material policy framework, and the proportionate evidence requirements **before** committing detailed design and consultant resource. This pre-application enquiry is intended to test the planning pathway, not to pre-empt the Council's determination.

## 12 NPPF (December 2024) Assessment

The National Planning Policy Framework (December 2024) Section 4 paragraphs 39 to 47 sets out the policy framework for pre-application engagement. NPPF Dec 2024 paragraph 40 confirms that "early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties." NPPF Dec 2024 paragraph 42 confirms that "the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits." " + nppf-cite("44") + "confirms that "the right information is crucial to good decision-making, particularly where formal assessments are required (such as Environmental Impact Assessment, Habitats Regulations Assessment and Flood Risk Assessment)." This enquiry has been prepared on those terms.

NPPF Dec 2024 Paragraph	Pre-application policy
Para 39	positive and creative approach to decision-making
Para 40	early engagement has significant potential to improve efficiency
Para 41	LPA's encourage parties to take maximum advantage of pre-app stage
Para 42	front-loading delivers infrastructure and affordable housing benefits
Para 43	other consenting bodies (statutory consultees, highways, water, EA) participate
Para 44	right information crucial to good decision-making
Para 45	LPA's publish information requirements (local list); kept to minimum; reviewed every 2 years
Para 47	Planning Performance Agreements considered for complex schemes

## 13 Heritage Assessment

The application site engages the heritage statutory framework. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the Council to "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses." Section 72(1) requires special attention to "the desirability of preserving or enhancing the character or appearance" of any conservation area engaged. Heritage harm is classified using canonical NPPF Chapter 16 tokens (no harm / less than substantial harm / substantial harm / total loss) and weighed against the public-benefits balance per NPPF paragraphs 213 to 219. The applicant's full heritage statement will accompany the formal application.

## 14 Design Rationale

The design proposition has been developed at RIBA Plan of Work Stage 2 (Concept Design) with reference to the National Design Guide (Ministry of Housing, Communities and Local Government, October 2019) and the National Model Design Code (Department for Levelling Up, Housing and Communities, July 2021). The ten characteristics of well-designed places have informed the design

rationale. The pre-application enquiry seeks the Council's view on the design approach in principle; detailed design will follow at RIBA Stage 3 and 4 ahead of formal submission.

## 15 Technical Strategies

The headline technical strategies are summarised below. Each will be developed in a specialist annex to the formal application.

Strategy	Headline position
Transport / access / parking	Anchored to NPPF paragraphs 115 to 117. Strategic Transport Statement to accompany the formal application.
Drainage and SuDS	Non-statutory SuDS Hierarchy applied. Lead Local Flood Authority pre-engagement to be undertaken.
Affordable housing	NPPF Dec 2024 paragraph 65 threshold engaged (10+ dwellings). Tenure split, AHP grant treatment per PPG Reference ID 12-012 (16 December 2025), and Local Plan affordable housing policy to be confirmed.
Biodiversity Net Gain (BNG)	Environment Act 2021 Schedule 7A — mandatory minimum 10% on-site preferred. Statutory metric output, baseline habitat assessment, and on-site / off-site / credits split to be confirmed at submission.
Sustainability and energy	Approved Document Part L 2021/2023 (interim). Future Homes and Buildings Standards commence 24 March 2027 per Building Circular 01/2026. Whole-life carbon framing under RIBA 2030 Climate Challenge.
Trees and arboricultural	BS 5837:2012 — Trees in relation to design, demolition and construction.
Ecology	Preliminary Ecological Appraisal (PEA) findings to inform survey window planning.

## 16 EIA, HRA and BNG Position

The applicant's position on Environmental Impact Assessment, Habitats Regulations Assessment, and Biodiversity Net Gain is set out below. The pre-application enquiry seeks the Council's confirmation of the screening conclusions reached.

Assessment	Statutory basis	Position
EIA	Town and Country Planning (EIA) Regulations 2017 (SI 2017/571), Reg. 6 + Sch. 2	Town and Country Planning (EIA) Regulations 2017 (SI 2017/571) Schedule 2 thresholds may apply. The applicant will either submit a Regulation 6 screening request alongside the formal application, or set out a written argument why the proposal does not engage Schedule 2 thresholds. Council confirmation requested.
HRA	Conservation of Habitats and Species Regulations 2017 — LSE test	European-site proximity / pathway flagged on desktop evidence. A Likely Significant Effect (LSE) screening note should be prepared unless the Council confirms it is unnecessary; mitigation cannot be assumed at screening per People Over Wind (CJEU C-323/17). The Council is asked to confirm whether any SAMM / SANG, nutrient neutrality, or Appropriate Assessment pathway applies.
BNG	Environment Act 2021 Schedule 7A (TCPA in force 12 February 2024)	Statutory minimum 10% biodiversity net gain. On-site preferred; off-site / mandatory credits as last resort. Statutory metric output and habitat baseline to accompany the formal application.

## 17 Validation List Mapping

NPPF Dec 2024 paragraph 45 confirms that validation requirements (the Council's local list) must be “kept to the minimum” and reviewed every two years. The table below maps each item on the Council's published local validation list to status and responsible consultant. The applicant invites the Council to confirm whether any item not currently noted as required would in fact be expected for an application of this typology.

Provisional validation item	Status (subject to Council confirmation)	Responsible
Application form + ownership certificate	Required (national list)	Applicant / agent
Location plan (1:1250 or 1:2500)	Required (national list)	Architect

Provisional validation item	Status (subject to Council confirmation)	Responsible
Existing + proposed block plans (1:500)	Required (national list)	Architect
Planning Statement	Recommended	Site Intelligence (planner)
Design and Access Statement (where required)	Subject to Council confirmation	Architect
Heritage Statement	Likely required	Heritage consultant
Flood Risk Assessment	Not anticipated; SuDS strategy provided in lieu	Drainage / flood consultant
Drainage strategy / SuDS	Recommended	Drainage consultant
Preliminary Ecological Appraisal (PEA)	Likely required	Ecologist
Statutory Biodiversity Metric (BNG)	Required if not exempt under Sch 7A	Ecologist
Arboricultural Impact Assessment (BS 5837:2012)	Required if any trees / hedges affected	Arboriculturist
Transport Statement / Access Note	Subject to Council confirmation	Transport consultant
CIL Additional Information form	Required at validation	Applicant / agent

The Council is invited to amend, add or remove items in this provisional list when responding to this enquiry. The list is provisional only — the formal application validation pack will reflect the Council's confirmed local list at the date of submission.

## 18 Community Engagement Strategy

The applicant will undertake a community engagement programme aligned to the Council's adopted Statement of Community Involvement (SCI) prepared under section 18 of the Planning and Compulsory Purchase Act 2004. The programme will set out methods, target groups, timing, and feedback handling. Where the proposed development falls within the categories of "prescribed development" requiring statutory pre-application consultation under section 122 of the Localism Act 2011 (inserting sections 61W to 61Y of the Town and Country Planning Act 1990), the statutory consultation requirements will be separately addressed and evidenced in the formal application.

## 19 Stakeholder Engagement

The applicant proposes a proportionate programme of stakeholder pre-engagement covering ward members, the parish or town council, immediate neighbours where the proposal is sensitive, and statutory consultees identified in NPPF Dec 2024 paragraph 43 (statutory consultees, highways authorities, water and sewerage undertakers, the Environment Agency). Engagement with the local Member of Parliament will be considered where the scheme is of strategic or public-interest importance. Section 25 of the Localism Act 2011 confirms that a councillor is not to be taken to have a closed

mind on a matter merely by reason of having previously expressed a view on it — pre-application engagement with elected members therefore does not constitute predetermination per PPG Reference ID 20-007.

**Member engagement (major schemes):** the applicant will engage transparently with ward members and the parish or town council where appropriate, in accordance with the Council's protocols and without prejudicing the formal decision-making process. A summary of engagement undertaken will accompany the formal application.

## 20 Heads of Terms (s.106 + CIL)

The applicant offers the following draft Heads of Terms for a section 106 agreement and notes the Community Infrastructure Levy position. Final heads will be subject to the Council's CIL charging schedule, the LPA's section 106 obligations protocol, and the financial arithmetic of the eventual scheme.

Potential planning obligations to be confirmed by the Council. The applicant's current priority is affordable housing delivery and any site-specific mitigation (highways, drainage, ecology / biodiversity stewardship) necessary to make the development acceptable in planning terms. Education, healthcare and travel-plan contributions to be confirmed against the Council's adopted s.106 / CIL policy and the scale of the eventual scheme.

## 21 Specific Numbered Questions for the Council

The applicant respectfully seeks the Council's pre-application advice on the following specific questions. Each question is numbered for ease of response. The applicant would be grateful if the Council's response could address each question in turn.

1. Does the Council confirm that the principle of the proposed development is acceptable in this location, having regard to the development plan and material considerations?
2. Which Local Plan policies and emerging plan policies does the Council consider most material? Are there any unresolved objections to the cited emerging policies that affect the weight to be given (NPPF Dec 2024 paragraph 49)?
3. What is the Council's current 5-year housing land supply position, and what weight does the Council attach to housing delivery as a public benefit?
4. What are the Council's proportionate information requirements per NPPF Dec 2024 paragraph 45— specifically, which items on the published local validation list does the Council confirm are required for an application of this scale?
5. Will the Council accept a Regulation 6 EIA screening request submitted alongside the formal application, or should this be a separate prior submission?
6. What level of pre-application engagement does the Council recommend — written advice, meeting, or a Planning Performance Agreement (NPPF Dec 2024 paragraph 47)?
7. Does the Council envisage referring this scheme to Planning Committee, or anticipate determination under delegated powers?

## 19.1 Council Response Requested

The matrix below pairs the applicant's initial position on each decision-relevant matter with the response the Council is asked to provide. The Council is invited to amend any cell where the applicant's initial position differs from the Council's view.

Matter	Applicant's initial position	Council response requested
Principle	Potentially acceptable subject to settlement-relationship and countryside-policy considerations	Confirm acceptability in principle
Application route	Likely full planning permission (or outline / Permission in Principle subject to Council preference)	Confirm preferred route
Design information	Architect to prepare layout, elevations and access geometry following pre-app feedback	Confirm minimum design information for the formal application
Highways and access	Access strategy reserved for design stage; current desktop review identifies no in-principle highway-safety concern	Confirm whether a transport statement / Stage-1 RSA is required
Drainage and flood risk	Flood Zone 1; SuDS strategy will accompany application	Confirm FRA / SuDS / LLFA expectations
Ecology and BNG	Statutory 10% BNG (Environment Act 2021 Schedule 7A) applies; PEA + metric will accompany application	Confirm survey-window and metric-version expectations
Heritage	No on-site designated asset; setting may be engaged (s.66/ s.72 LB&CA Act 1990)	Confirm whether a Heritage Statement is required
Validation list	Applicant seeks proportionate list per NPPF Dec 2024 paragraph 45	Confirm full local-list items required

## 19.2 What the Architect Needs from this Report

This pack does not include architectural sketches, layout options, elevations or measured-survey work. Its purpose is to establish the planning strategy, key constraints, validation requirements and Council response points **before** the architect develops layout options. The architect should use the Council's pre-application response, together with this pack, to prepare a parameter-led layout that protects nearby heritage setting, retains landscape structure, locates access safely from the proposed access point, and addresses drainage and ecology / BNG at concept stage. The applicant has chosen to confirm the planning pathway **before** committing further design resource — the principal benefit of front-loading the pre-application conversation per NPPF Dec 2024 paragraph 42.

## 19.3 Red Flags Before Committing Further Spend

**The applicant should pause and reconsider scope / programme before further spend if the Council's pre-application response surfaces any of the following:**

- Council indicates the principle of development is not, in principle, capable of support on this site.
- Highways authority objects to access from the proposed access point in principle, or requires significant off-site works that materially affect viability.
- Heritage officer identifies unacceptable setting harm to nearby designated assets.
- Natural England / ecology pathway triggers a seasonal survey delay (e.g. PEA followed by bat / breeding-bird surveys outside the active window).
- Voluntary affordable housing offer is not accepted by the Council as a sufficient public-benefit contribution.
- Planning Committee referral is likely AND officer support for the principle is unlikely.
- Lead Local Flood Authority requires upfront FRA / SuDS evidence the desktop position has not anticipated.

## 22 Programme

The indicative programme below maps the project from pre-application engagement through to start on site. The statutory determination period under Article 34 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 is 8 weeks for minor and householder applications, 13 weeks for major applications, and 16 weeks for applications requiring an Environmental Impact Assessment. Programme dates beyond the formal application stage are indicative and subject to the Council's determination route and the resolution of any planning obligations.

Stage	Indicative timing
Pre-application enquiry submitted	10 May 2026
Pre-application response received	Per Council's pre-app turnaround
Formal planning application submitted	Subject to pre-app outcome
Statutory determination period	13 weeks (Article 34 DMPO 2015 — major)
Conditions discharge	Per planning permission conditions
Start on site (target)	Subject to permission, conditions, and commercial readiness

## 23 Decision-Context Intelligence

The following decision-context intelligence has been compiled from public Planning Inspectorate, Housing Delivery Test, and LPA performance data. It is provided for the Council's benefit in framing the pre-application response. Source provenance is maintained in the technical appendices.

Metric	Current evidence	Planning relevance
Housing Delivery Test	118% (HDT 2023) — 5% buffer applies	Buffer trigger / housing-delivery pressure

Metric	Current evidence	Planning relevance
Five-year housing land supply	2.97 years	Tilted-balance trigger; weight to housing benefit
Affordability ratio	ONS housing affordability ratio — Council position to confirm	Supports housing need context (NPPF Dec 2024 paragraph 60framing)
Determination performance	Council to confirm against the most recent published decision-speed figures	Programme risk only — not a planning-merit consideration

Figures sourced from MHCLG Housing Delivery Test, ONS housing affordability data and DLUHC LPA-performance returns. "Council to confirm" indicates the figure has not been published or independently retrieved at the date of this report; the Council is invited to confirm or correct the figure in the pre-application response.

### 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.

### Committee Determination — Evidence Strategy

As a major application (15 dwellings), this scheme is likely to be determined by planning committee. The submission should be prepared to address common member concerns — particularly design quality, residential amenity, character and appearance, and highway impacts — in addition to the technical planning policy analysis.

## 24 General Desktop Limitations

### 24.1 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

### 24.2 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

### 24.3 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

## 24.4 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)

## 24.5 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
- Scheme changes based on pre-application feedback
- Officer changes at LPA affecting pre-app advice
- Relevant committee decisions on comparable applications

## 25 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.

## 25.1 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.*

## 25.2 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

## 26 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.

## 27 Update Triggers

**Validity Period: 6 months from date of issue.**

Pre-Application Enquiry is valid for 6 months from date of issue. 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
- Scheme changes based on pre-application feedback
- Officer changes at LPA affecting pre-app advice
- Relevant committee decisions on comparable applications

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.

## 28 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 pre-application-advice 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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**Product-Specific Note**

This Pre-Application Enquiry 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
<b>EA Flood Map for Planning</b> <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
<b>National Heritage List for England</b> <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
<b>MAGIC Interactive Map</b> <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
<b>Multi-source constraint detection</b> <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	—
<b>Census 2021</b> <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
<b>PTAL Calculation (TfL TN14)</b> <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
<b>OpenStreetMap / Overpass</b> <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
<b>BGS Geology of Britain</b> <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
<b>HM Land Registry Price Paid Data</b>	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

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FOR AND ON BEHALF OF

**Site Intelligence™**

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