

[17/00040/REF](#) Knowle Appeal

Submission from the Vision Group for Sidmouth

We would like to confirm that the submission made by the Vision Group on 11th November with regard to the planning application [16/0872/MFUL](#) still stands: <https://www.visionforsidmouth.org/news/2016/november/vgs-futures-forum-comment-on-knowle-planning-application-latest-documents.aspx>

We would nevertheless like to provide the following additional information, on the basis of the decision made by the Development Management Committee on 6th December 2017:

The Council hereby refuses permission to carry out the development described in the application and the plans attached thereto for the following reasons :

*1. The proposed development by virtue of its scale, height, bulk and massing would have an overly dominant impact on the public gardens and parkland adjacent to the site and the streetscene of Knowle Drive. Furthermore the development would be visually overbearing and lead to a significant loss of light and privacy to neighbouring properties. As a consequence the proposed development is considered to be an overdevelopment of the site contrary to the requirements of **Strategy 6 - Development within Built-Up Area Boundaries, Strategy 48 - Local Distinctiveness in the Built Environment and Policy D1 - Design and Local Distinctiveness** of the adopted East Devon Local Plan.*

*2. The proposed development purports to be a C2 (extra care facility) with no affordable housing being provided as part of the proposal. It is however considered based on the submitted details, case law and available guidance that the proposed units would constitute separate residential dwellings within the C3 use class under the Use Classes Order 1987 (as amended). It is considered that the proposed development is required to make provision for affordable housing and no mechanism has been provided to enable such provision to be secured. The proposed development is therefore contrary to the requirements of **Strategy 34 - District Wide Affordable Housing Provision Targets** of the adopted East Devon Local Plan.*

*3. The proposed development in respect of Building E, by virtue of its scale, height, mass and bulk, its positioning close to the listed summerhouse, and the resulting loss of the existing terraces and associated landscaping, would be harmful to the setting of the heritage asset. It is considered that although alternatives have been considered and the public benefits made clear these would not outweigh the identified harm and that the development would therefore be contrary to the requirements of **Strategy 26 - Development at Sidmouth, Strategy 48 - Local Distinctiveness in the Built Environment and Policy EN9 - Development Affecting a Designated Heritage Asset***

<http://planningapps.eastdevon.gov.uk/Planning/StreamDocPage/obj.pdf?DocNo=2504889&PageNo=1&content=obj.pdf>

POINT 1) VISUAL IMPACT AND OVERDEVELOPMENT:

FROM: http://futuresforumvgs.blogspot.co.uk/2016/05/knowle-relocation-project-pegasus_29.html

It can be clearly demonstrated that the same District Council policies as laid out in the Local Plan apply to both the rejected planning application of 1st March 2013 and the rejected planning application of 6th December 2016, currently out on appeal: [Futures Forum: Knowle relocation project > Pegasus planning application 16/0872/MFUL >>> and the rejected planning application 12/1847/MOUT of 1st March 2013 >>> Part one: "Contrary to Policy RE1 \(Retention of Land for Sport and Recreation\)"](#)
[Futures Forum: Knowle relocation project > Pegasus planning application 16/0872/MFUL >>> and the rejected planning application 12/1847/MOUT of 1st March 2013 >>> Part two: "Contrary to the requirements of Policy E3 \(Safeguarding Employment Land and Premises\)"](#)

The third reason the Development Management Committee gave for rejecting the 2013 application can be equally applied to the latest planning application from PegasusLife: **3 - Contrary to policy D1 (Design and Local Distinctiveness)**

The DMC considered that the application of 1st March 2013 would be 'harmful to the visual amenity and character of Station Road':

RESOLVED: that the application 12/1847/MOUT be refused, contrary to Officer recommendation, for the following reasons:

*3. The proposed development as a result of its close relationship with Station Road and prominent position on the entrance to the town would be harmful to the visual amenity and character of Station Road which forms an important approach to the town through which many tourists and other visitors to the town pass. The loss of amenity and character to this area would be **contrary to policy D1 (Design and Local Distinctiveness)** of the adopted East Devon Local Plan*
[combined-special-dmc-agenda-010313.pdf](#)
[combined-dmc-agenda-020413.pdf](#)

And indeed, looking at the Proposed Site Plan for the 2013 application, it was judged that these plans did pose considerable 'impact on the visual amenity and character of Station Road':

<http://planningapps.eastdevon.gov.uk/Planning/StreamDocPage/obj.pdf?DocNo=1010422&PDF=true&content=obj.pdf> (document 1010422 on page 164)

The question is, however, whether the current plans would also be 'harmful to the visual amenity and character of Station Road'.

With regard to these latest plans, the developer PegasusLife make their case very clear. In the accompanying plans on their website they state that 'Our site includes the EDDC buildings and parts of the grounds including the council car park. It does not include the car park near Station Road.'

<http://www.theknowleconsultation.co.uk/>

<https://planning.eastdevon.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=O5ICQC GHo1Coo> (document 2267858)

However, within the context of not building directly on Station Road (which was a feature of the 2013 planning application), the developer omits mention of the height and scope of the buildings on the site as a whole - and that is considerable and unprecedented.

In fact, it has been estimated that should this go ahead, the tallest building on the Knowle site would be the second highest in the area - second only to the parish church:

[Futures Forum: Knowle relocation project >>> a far more imposing development than assumed? Part Three](#)

Such is the height and mass of the proposed development, in the so-called 'Dell' taking up the car park as well as the larger 'Plateau' above, there would clearly be considerable 'loss of amenity and character to this area' – not only for Station Road, but for large parts of the town and beyond.

HOW DOES THE KNOWLE SIT IN ITS LANDSCAPE?

The building cannot be regarded separately from the grounds.

The Knowle gardens are on the Devon Local Register.

[The Knowle | Devon Gardens Trust](#)

[EDDC reject Knowle Planning Application | Devon Gardens Trust](#)

The Devon Gardens Trust has been instrumental in campaigning for the integrity of the grounds and gardens at Knowle. This is from their objection to the 2013 planning application:

The parkland of The Knowle forms part of the attractive approach to Sidmouth, providing an important contribution to the overall historic character and landscape of the town. In this respect the development proposed would have a significant detrimental effect upon the setting of the conservation area and views into and out of it.

[Letter to East Devon - Knowle - 5-11-12.pdf](#)

[Futures Forum: Knowle relocation project: "How buildings sit in their landscape"](#)

PROXIMITY TO EAST DEVON AREA OF OUTSTANDING NATURAL BEAUTY

The Knowle grounds are immediately adjacent to the East Devon Area of Outstanding Natural Beauty – and as such are afforded more protection than the planning application refers to:

Current maps indicate the close proximity of Knowle to the East Devon AONB. , as does aerial photography. EDDC's own regulatory framework requires that proximity to AONB be taken into account:

‘The policy stipulates that development will only be permitted within or adjacent to the East Devon AONB where it conserves or enhances the landscape character of the area, respects traditional local built forms and complies with policies on development in the countryside.’(page 130)
eastdevon.gov.uk/media/1167579/combined-dmc-agenda-120612.pdf
[Futures Forum: Knowle relocation project: "How buildings sit in their landscape"](#)
[Futures Forum: Knowle: Victorian hotel and grounds ... application to English Heritage for national listing](#)

The East Devon AONB authority also makes this clear:

*The EDAP would like to be consulted on planning applications in the AONB or **within close proximity to the boundary**, which fall into the following categories and are thought to be potentially damaging to the AONB landscape and coastline features. Residential development: applications within settlements involving 5 or more dwellings (or, where the number of dwellings is not indicated, the site area is 0.2 hectares or greater), except where the site is specifically allocated for residential use in an approved plan. Outside settlements, applications involving a smaller number of dwellings (or a smaller site area), or the conversion of agricultural buildings, at the discretion of the planning authority.*
http://www.eastdevonaonb.org.uk/uploads/documents/conserves/Policy%20and%20Planning/planning%20protocol_revised_Jun14v1.pdf

VISUAL IMPACT

It is clear, however, that the latest planning application will have an impact way beyond the immediate vicinity of Knowle.

In its comment so far, the Save Our Sidmouth group has highlighted *‘the height and visual intrusiveness of the buildings, and the massing’*:

Visual impact of developer’s plans for Knowle raises concerns

May 18, 2016

PegasusLife have made their Planning Application for the Knowle. The reference, to be quoted in any correspondence, is 16/0872/MFUL. The return date for comments and objections at the moment is 15th June.

Save Our Sidmouth (SOS) has numerous comments on the proposal, which will be submitted to East Devon District Council (EDDC) in the near future, and published on this website, in advance of the due date, to enable you to comment if you so wish.

Foremost amongst SOS objections will be

– the excessive number of dwellings planned, (Currently 115, in contrast to 50 allocated in the Local Plan)

– insufficient parking for the residents, which will mean they are likely to use the remaining public car park

– building on the existing terraces

– use of inappropriate materials and finishes

*– **and, very importantly, the height and visual intrusiveness of the buildings, and the massing.***

The buildings are high (e.g. building F is nearly 7m higher than the existing roof line) and will have a far greater visual impact than the present ones.

Present view of Knowle buildings as seen from across the Bickwell Valley:



An approximation with heights verified, of the west face of the Knowle Plateau using Pegasus's drawings – as not supplied in their Townscape and Visual Impact Report. The rear buildings have been omitted here, in order to show a section of the existing Knowle building- for scale:



[Visual impact of developer's plans for Knowle, raises concerns | Save Our Sidmouth](#)

On the other hand, the Townscape and Visual Landscape document from developers PegasusLife, part of the Planning, Design and Access Statement, is breath-taking in its blasé take on the visual impact of its proposed plans:

<http://planningapps.eastdevon.gov.uk/Planning/StreamDocPage/obj.pdf?DocNo=2267755&PDF=true&content=obj.pdf>

The Policy D1 in the adopted Local Plan makes it clear that it is a priority of the District Council to preserve the local distinctiveness of Sidmouth – and it is clear that this latest planning application does not do this.

The Local Plan has several statements to that effect:

Strategy 48 - Local Distinctiveness in the Built Environment:
Local distinctiveness and the importance of local design standards in the development process will be of critical importance to ensure that East Devon's towns and villages retain their intrinsic physical built qualities. Where towns or villages are or have been despoiled we will seek to have qualities reinstated through good design. Use of local materials and local forms and styles will be essential to this distinctiveness.
We will work with our partners and local communities to produce Design Statements to guide new development and ensure its appropriateness.

And the Policy continues with a commitment to look after the historic landscape – which echoes the concerns of the DMC in 2013 about the impression Sidmouth would give ‘tourists and other visitors’:

Historic Environment:

18.60 We regard it as essential that we conserve and enhance the historic environment of East Devon. The traditional buildings of East Devon bring pleasure to residents and visitors alike, they form a key part of the tourism appeal of the District and help define the identity of East Devon.

As for the Policy D1 itself, it is difficult to see how the current planning application cannot be rejected, as it fails to observe the key demands however many pages of Design and Access Statement there are (and there are 125 pages) - notably with regards to 'the scale, massing, density and height' of the buildings:

D1 - Design and Local Distinctiveness:

In order to ensure that new development, including the refurbishment of existing buildings to include renewable energy, is of a high quality design and locally distinctive, a formal Design and Access Statement should accompany applications setting out the design principles to be adopted should accompany proposals for new development.

Proposals should have regard to Village and Design Statements and other local policy proposals, including Neighbourhood Plans, whether adopted as Supplementary Planning Guidance or promoted through other means. Proposals will only be permitted where they:

- 1. Respect the key characteristics and special qualities of the area in which the development is proposed.**
- 2. Ensure that the scale, massing, density, height, fenestration and materials of buildings relate well to their context.**
- 3. Do not adversely affect:**
 - a) The distinctive historic or architectural character of the area.**
 - b) The urban form, in terms of significant street patterns, groups of buildings and open spaces.**

<http://eastdevon.gov.uk/media/1515081/local-plan-adopted-text-subject-to-final-layout-changes-jan-2016.pdf>

POINT 2) C3 USE AND AFFORDABLE HOUSING:

FROM: http://futuresforumvgs.blogspot.co.uk/2016/05/knowle-relocation-project-pegasus_31.html

There are several other Strategies which this latest application is 'contrary to':

BALANCED COMMUNITIES AND AFFORDABLE HOUSING

There has been considerable concern of late about the District's ageing population - and what that means for the balance of communities:

[Futures Forum: "We need a more balanced community." >>> "The Sid Valley needs a 'long-term vision' to attract more young people and families."](#)

[Futures Forum: East Devon's demographic time bomb >>> "the District Council has a duty to create balanced communities"](#)

It is also a concern of the District Council - as detailed in the Local Plan:

Strategy 4 - Balanced Communities

By balanced communities we mean that in any area or neighbourhood there is a match between jobs, homes, education, and social and community facilities. Ideally these should complement the range of ages of the resident population and have appropriate access for those with disabilities. Key components of a balanced community include:

c) Getting more age-balanced communities - many East Devon communities have an overtly aged population profile. Where this is the case we will encourage residential development that will be suited to or provide for younger people and younger families.

This means having more affordable housing:

Strategy 34 - District Wide Affordable Housing Provision Targets:

Affordable housing will be required on residential developments in East Devon as follows .

Areas to which higher (50%) affordable housing targets apply:

Outside of the areas listed above (i.e. all other parts of East Devon including all settlements not listed, coastal and rural areas and Budleigh Salterton and Sidmouth) 50% of the dwellings shall be affordable subject to viability considerations. The 50% figure applies to all areas that do not come under the 25% classification and which are permitted under Strategy 35 'Exceptions' policy. Where a proposal does not meet the above targets it will be necessary to submit evidence to demonstrate why provision is not viable or otherwise appropriate. An overage clause will be sought in respect of future profits and affordable housing provision, where levels of affordable housing fall below policy targets.

Five Year Land Supply and Sub-Housing Areas

20.5 The following table identifies key monitoring indicators

Vision/Objective/Aspiration:

Provide affordable housing to retain younger people in our neighbourhoods and communities as well as housing others in need

[local-plan-adopted-text-subject-to-final-layout-changes-jan-2016.pdf](#)

AFFORDABLE HOUSING SHOULD BE PROVIDED ON SITE

All of this is confirmed through an FOI request into correspondence with the developer before a formal planning application was submitted:

[Pre Application meetings with Pegasus - a Freedom of Information request to East Devon District Council - WhatDoTheyKnow](#)

The senior Planning Officer dealing with the application has made it clear that the applicant has certain obligations - and there is also disagreement over the classification of the proposed development:

Our conclusion based on this assessment and a Counsel opinion is that the proposed units should be classed as C3 (dwelling houses).

[Rather than the C2 classification desired by the applicant. See: [Building Use Classes C1 C2 C3 - Planning Consultants London](#) and [Clarification of Planning Classes with regards to C3\(b\) and C2 - GovYou](#)]

*Turning to the issue of affordable housing the newly adopted policy of the East Devon Local Plan (Strategy 34) sets out a target of 50% affordable housing for residential development in Sidmouth. **The presumption is that such affordable housing should be provided on site. As a result we will be seeking on-site provision of affordable housing in this case.** We appreciate that the provision of your mandatory well-being care and support package is likely to be unviable to a registered provider but can see no reason given the layout of the proposed units on the site why your care and support package would have to apply to all residents. The facilities could still be available to residents of the affordable units on the same basis as they will be available to the wider community. We would however accept that it would be appropriate for the affordable units to also be age restricted and we believe that there is sufficient demand in the local area to fill the affordable units. Strategy 34 does allow for an offsite contribution of equivalent value to be provided where the inability to make provision on-site can be justified through evidence from Registered Providers or for other planning reasons. We would be open to considering a case for provision to be made off-site but as detailed above the presumption is that provision should be made on-site in the first instance and so the onus would be on yourselves to demonstrate to us why this would not be possible. **You should also note that Strategy 34 is predicated on ensuring that developments are viable and so in the event that you believe that our requirements are unviable we are willing to consider a suitable robust and independent viability assessment.** Our usual practice is to obtain an independent appraisal of such viability information through the District Valuer. We must advise at this stage that we would expect the cost of the District Valuer to be borne by the developer.*

*We understand that both the assessment that the scheme constitutes a C3 use and the level of affordable housing sought will come as a disappointment but we can assure you that **these issues have undergone a very detailed consideration by Officers with appropriate independent legal opinion.** To date we believe that we have had meaningful and constructive discussions and look forward to these continuing in respect of this issue.*

[And 'viability' is a very slippery commodity: [Revealed: how developers exploit flawed planning system to minimise affordable housing | Cities | The Guardian](#) and [The truth about property developers: how they are exploiting planning authorities and ruining our cities | Cities | The Guardian](#)]
[KnowleUseClassLetter.doc](#)

The question to ask, therefore, is:

Why, then, did the District Council chose as its preferred developer a company which specialises in building 'assisted-living apartments and wellness facilities for over 60s'?

[Introduction | PegasusLife](#)

[Pegasus agreement re Knowle - a Freedom of Information request to East Devon District Council - WhatDoTheyKnow](#)

It had other bidders as part of the tendering process, but nevertheless preferred PegasusLife:

[Decision process which led to the award of the conditional contract with Pegasus re Knowle - a Freedom of Information request to East Devon District Council - WhatDoTheyKnow](#)

POINT 3) SETTING OF HERITAGE ASSET:

FROM: http://futuresforumvgs.blogspot.co.uk/2016/05/knowle-relocation-project-pegasus_68.html

The DMC's fourth and final reason for rejecting the planning application on 1st March 2013 also has parallels with the current application: **4 - Contrary to policy EN9 (Extension, Alteration or Change of Use of Buildings of Special Architectural and Historic Interest)**

RESOLVED: that the application 12/1847/MOUT be refused, contrary to Officer recommendation, for the following reasons:

*4. The proposed development would have a harmful impact on **the setting of the listed building** known as Balfour Lodge which formed one of the original gatehouses to Knowle by virtue of its close relationship and the form of development proposed. The development would therefore be **contrary to policy EN9 (Extension, Alteration or Change of Use of Buildings of Special Architectural and Historic Interest)** of the adopted East Devon Local Plan.*
http://www.eastdevon.gov.uk/special_dev_man_010313_mins.pdf

These 2013 plans did indeed 'have a harmful impact on the setting of the listed building known as Balfour Lodge':

<http://planningapps.eastdevon.gov.uk/Planning/StreamDocPage/obj.pdf?DocNo=1010422&PDF=true&content=obj.pdf> (document 1010422 on page 164)

It is, however, clear that the current plans do not constitute any such threat, as there would be no building on the lower car park, which is opposite the Lodge – as made clear by the developer PegasusLife.

In the accompanying plans on their website they state that

'Our site includes the EDDC buildings and parts of the grounds including the council car park. It does not include the car park near Station Road.'

[Introduction | PegasusLife](#)

<https://planning.eastdevon.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=O5ICQC GHo1Coo> (document 2267858)

SUMMERHOUSE IN THE GROUNDS OF KNOWLE: 2013

However, what the objection made by the DMC on 1st March 2013 to that planning application omitted was that the plans they rejected would have had 'a harmful impact on the setting of the listed building known as' ... the Summerhouse.

Because what was a serious shortcoming at the time was the undervaluing of the site's most vulnerable Grade II Listed Building:

[Summerhouse in the Grounds of Knowle, Sidmouth Urban District Offices - Sidmouth - Devon - England | British Listed Buildings](#)

Rather depressingly at the time of the 2013 application, the District Council did not seem to be particularly bothered with this Listed Building. It was very unclear how the planning application would affect the summerhouse:

'When you sell the Knowle, what will happen to the listed building and the grounds that are open to the public?'

'There is a Grade II listed summerhouse in Knowle grounds and this will be given appropriate consideration within the planning process. It will be up to the developer to decide if they wish to retain the structure or seek to remove or relocate it and this will be part of their planning application.'

[EDDC: Moving and Improving site: FAQs July 2012]

This approach would certainly not endear the developers to English Heritage:

[Setting of Heritage Assets | Historic England](#)

<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>

Moreover, the Heritage Statement put together by consultants Kensington Taylor in 2012 was rather damning of the quality of the setting of the summerhouse:

<http://planning.eastdevon.gov.uk/online-applications/applicationDetails.do?>

<http://planningapps.eastdevon.gov.uk/Planning/lg/GFPlanningDocuments.page>

With a critique of the report from the time:

The report claims that the buildings and grounds are 'much altered' and that 'the setting of the listed Summerhouse is already much compromised and divorced from the original integrity of the extended grounds.' This understanding of the setting is in much dispute, as has been made clear by the submissions from established bodies including the Devon Gardens Trust and SAVE Britain's Heritage.

[Critique of the Heritage Statement for the revised plans for the Knowle. | Save Our Sidmouth](#)

SUMMERHOUSE IN THE GROUNDS OF KNOWLE: 2016

With regard to the latest planning application at Knowle, the developer makes it quite clear that it will not be interfering with the summerhouse:

The park, the car park near Station Road and the existing Grade II listed summerhouse will remain in public ownership.

[Introduction | PegasusLife](#)

Nevertheless, as with the Kensington Taylor report of 2012, the 2016 Heritage Statement clearly intends to diminish the value of the 'setting' of the heritage asset - thereby justifying the building on the terraces immediately above the summerhouse:

"Although there is still historic and visual linkage between the asset and the Knowle, the degree to which the structure is perceived as part of a Victorian garden landscape has, however, been almost entirely lost."

And yet there seems to be some hesitation as to the value of the terraces as part of the setting:

"The principal element of setting for this listed building is therefore considered to be the gardens in which it sits, whilst the wider surroundings, including the Knowle, all provide a minimal level of value to its significance."

4.0 HERITAGE ASSETS 4.2 LISTED BUILDINGS

Summerhouse in the Grounds of Knowle (NHLS 220078)

The Summerhouse is a small, semi-detached gable predominantly built in randomly-coursed flint incorporating shell work, with a single buttress, and set on a free-dressed plinth. A set of stone steps, with flint sides, lead up to the elevated seat, which has perpendicular brick arches set into the wall, with wadded backdrops.

It is unclear when it was built, and although the title description states that it may have been part of the alterations undertaken by Thomas Pitt, as part of his extensive alterations to the House and the gardens, it might also have been part of the later alterations undertaken by Richard Thompson. Both were responsible for significant alterations and additions to the gardens, including grottoes and similar structures, in order to provide additional interest for the public. The likely date of construction of the Summerhouse is likely therefore to lie in the range of the 1820s to the 1870s.

The immediate setting of the asset is the Upper Lawn, which retains some degree of its historic landscaping in the form of the footpath layout, terracing and mature specimen tree planting. Beyond this Upper Lawn, the Lower Lawn, the Pettland, The Knowle, and other surroundings, buildings and structures form the immediate setting, whilst the urban development of Sidmouth, the sea coast and the surrounding green hills all form the wider setting of this listed building.

As an item of garden architecture, the summerhouse was designed to form both a focal point within the landscape, and to be a point from which views of the house and surrounding gardens could be appreciated. Its historic representation of Victorian garden design, together with its illustration of the changing nature of the gardens and of The Knowle, all contribute to the overall significance of the listed building, whilst its architecture and unique appearance are all part of the general intended aesthetic. The 'wild' and rustic appearance, combined with the Gothic Revival style of architecture, clearly illustrate the trend of such garden design during the nineteenth century, developing on from the romantic designs of the landscape designers of the eighteenth and early nineteenth centuries. The structure also has both historic and modern communal value, through its position and role as an area of publicly-accessible seating within gardens, still evolved by the bench positioned within it.

The immediate garden setting of the listed building is therefore of high importance to the way in which the asset was designed to function historically, and how it was and continues to be experienced. This immediate setting has, however, had its historic interest diminished through the removal



Photo 11: The Summerhouse with steps and bench

of elements of the landscape, and its development, such as Knowle Grange, and latterly the flats, and the Canal buildings. Although there is still historic and visual linkage between the asset and The Knowle, the degree to which the structure is perceived as part of a Victorian garden landscape has, however, been almost entirely lost. This is through the degree of alteration to both the appearance and use of the principal building, all of which has fundamentally altered the context of this element of setting. The principal element of setting for this listed building is therefore considered to be the gardens in which it sits, whilst the wider surroundings, including The Knowle, all provide a minimal level of value to its significance.



Photo 12: Four walls of Summerhouse, facing towards the sea



Figure 6: Location of Summerhouse

[Heritage and Archaeology Statement](#) [Planning, Design and Access Statement](#)

The Devon Gardens Trust, SAVE Britain's Heritage and English Heritage (now known as Historic England) would disagree:

[Futures Forum: Knowle relocation project: SAVE Britain's Heritage >>> Historic England acknowledged that both the house and the park are of 'clear local interest' and are 'evidently highly valued by the local community'.](#)

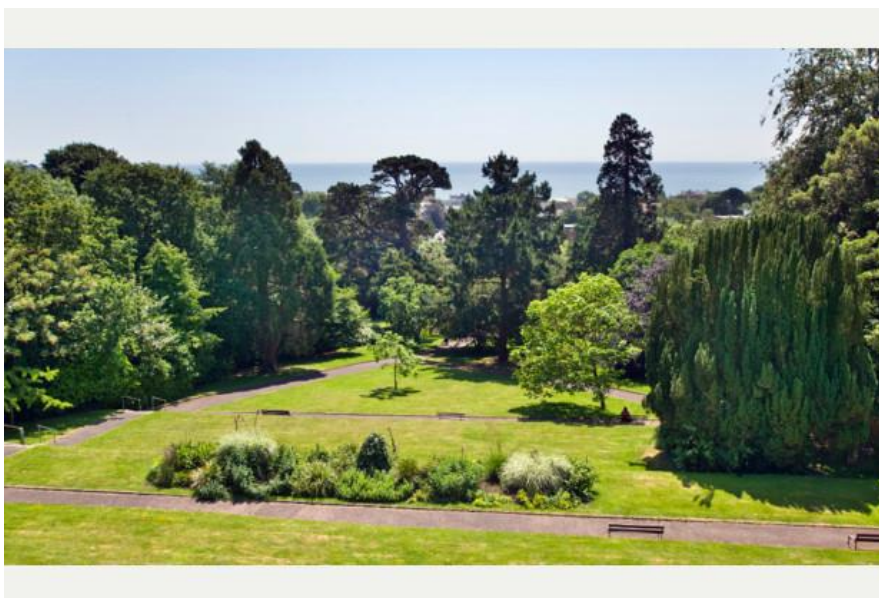
And, actually, the terracing at Knowle, which would have been a late Victorian piece of landscaping, is in integral part of the parkland - and as such provides the 'setting' for the summerhouse.

Japanese garden design might seem a million miles away from Sidmouth, but an observer sent in this comment:

"Orientalism became popular in the 1860s onward which accounts for the increased exoticism of many gardens. The verandah arrangement connecting the interior with the lawns could be described as oriental."



[Savills UK | The Knowle | Development | To Buy](#)



The summerhouse is just behind the evergreen tree in the foreground to the right...

[East Devon Council headquarters go on sale | Western Morning News](#)
[Futures Forum: Knowle relocation project: "How buildings sit in their landscape"](#)

And the upper lawns above this will be built on under the current planning application:

[Futures Forum: Knowle relocation project: "The great garden grab"](#)

[Futures Forum: Knowle relocation project: "A magnificent new development coming soon, situated in a stunning, historic landscape with extensive gardens and leisure spaces."](#)

[Futures Forum: Knowle relocation project: expropriation & eminent domain >>> "The principle that there is a public realm of common citizenship and essential public goods and space which ought not to be appropriated for private benefit."](#)

CONCLUSION:

We would therefore urge that the appeal by PegasusLife be rejected.

Submitted 19th August 2017

Jeremy Woodward

on behalf of the Futures Forum of the Vision Group for Sidmouth