

Planning Application: 16/0872/MFUL

Submission from the Vision Group for Sidmouth: 14th June 2016

The VGS objects to the planning application 16/0872/MFUL

<https://planning.eastdevon.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=O5ICQCGH01C00>

The planning application 16/0872/MFUL is contrary to several Policies and Strategies in the adopted Local Plan.

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### **1 - Contrary to policy RC1 - Retention of Land for Sport and Recreation**

for the following reasons:

1. No “alternative provision of equivalent community benefit” has been provided.
2. No “sports and recreational facilities [will] be retained and enhanced” on site.
3. There is no “excess of public open space” locally.

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

These reasons restate those given by the Development Management Committee when it rejected the outline planning application 12/1847/MOUT on 1st March 2013: <https://planning.eastdevon.gov.uk/online-applications/applicationDetails.do?activeTab=neighbourComments&keyVal=M95J5FGH01C00>

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

1. The proposed development incorporates the construction of dwellings on parts of the site currently used as an area of open space which forms an important amenity for residents of Sidmouth and should be retained for the benefit of the community. The proposal does not include alternative provision of equivalent community benefit and it has not been demonstrated that sports and recreation facilities can best be retained and enhanced through the development.

Furthermore the Local Planning Authority is not satisfied that the open space is surplus to requirements and the development is therefore considered to be contrary to Policy RE1 (Retention of Land for Sport and Recreation) of the adopted East Devon Local Plan and the guidance of paragraph 74 of the National Planning Policy Framework.”

<http://eastdevon.gov.uk/media/1167448/combined-dmc-agenda-020413.pdf>

In 2013, the DMC made its decision to reject the planning application when the amount of Parks and Recreation Grounds in Sidmouth was 7.33ha above the minimum standard: <http://eastdevon.gov.uk/media/939266/110315-cabinet-combined-agenda.pdf>

Following the Open Space Study Review of 2014, the amount of Parks and Recreation Grounds above the minimum standard was substantially reduced – to 1.75ha:

<http://eastdevon.gov.uk/planning-libraries/evidence-document-library/chapter8.4-environment/env046-openspacestudyreview2014.pdf>

The Deputy CEO considers that this would allow the parkland at Knowle to be built on: “Accordingly, should the 0.354ha subject to Policy RE1 be lost there would still be an excess of 1.396ha when judged against the assessment criteria.”

<http://eastdevon.gov.uk/media/939266/110315-cabinet-combined-agenda.pdf>

However, at the time of the 2013 application, the National Trust objected to the 2.25ha of its Sid Meadow in the Byes being classified as a “park and recreation ground” – rather than a meadow which had recently had sheep grazing on it:

<http://futuresforumvgs.blogspot.co.uk/2013/07/knowle-byes-and-when-meadow-is-park.html>

Consequently, as also pointed out at the time, “Putting these sections of The Byes into their correct designation as natural & semi-natural green space means that there is no surplus of P & R in Sidmouth – in fact there is less than even the minimum suggested standard.” <https://saveoursidmouth.com/2013/03/05/an-oversupply-of-parkland-in-sidmouth/>

Moreover, the incursion into Knowle’s public open space “has never been debated by councillors”: <https://saveoursidmouth.com/2015/03/13/incursion-into-knowles-public-open-space-has-never-been-debated-by-councillors/>

Finally, the way in which the area of parkland was included in the Local Plan is very opaque indeed: <https://eastdevonwatch.org/2014/12/10/is-head-of-knowle-relocation-scheme-to-be-trusted/>

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## **2 - Contrary to Strategy 32 - Resisting Loss of Employment, Retail and Community Sites and Buildings**

for the following reasons:

1. The proposals will not “ensure that local communities remain vibrant and viable”.
2. The proposals are contrary to the Council’s stated aim to “resist the loss of employment ... and community uses.”
3. The proposals do not indicate that “Options for retention of the site or premises for its current or similar use have been fully explored without success for at least 12 months”.
4. There is no “clear demonstration of surplus supply of land or provision” in Sidmouth.

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

These reasons restate those given by the Development Management Committee when it rejected the outline planning application 12/1847/MOUT on 1st March 2013: <https://planning.eastdevon.gov.uk/online-applications/applicationDetails.do?activeTab=neighbourComments&keyVal=M95J5FGH01C00>

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

“2. The proposed development by virtue of the loss of a large area of current employment land and the loss of an existing park and walk facility which provides an important car parking facility used by visitors to the town and its businesses would have a significant detrimental impact on the economy of Sidmouth.

“It has not been adequately demonstrated that all options for the retention of the site for employment uses have been fully explored or that there is a surplus of employment land in the locality. It is therefore considered that the proposed development would be contrary to the requirements of Policy E3 (Safeguarding Employment Land and Premises) of the adopted East Devon Local Plan”

<http://eastdevon.gov.uk/media/1167448/combined-dmc-agenda-020413.pdf>

The DMC rejected the loss of employment land in March 2013 – when it was clear that the draft Local Plan had already proposed 50 dwellings for the site: (H1 - Residential Land Allocation: page 177) <http://www.eastdevonalliance.org.uk/wp-content/uploads/publicationdraftnewlocalplan.pdf>

The DMC based its decision on the Economic Impact Study from consultants Peter Brett which had been published in April 2012 as part of the planning application 12/1847/MOUT. The Economic Development Manager was quoted as saying “that if the changes proposed are approved and implemented this would have an immediate and lasting impact upon Sidmouth’s economy.”

The Sid Vale Association concurred, stating that “The relocation of the Council’s Offices would lead to a significant loss of employment in the town and would cause harm to local businesses”. <https://planning.eastdevon.gov.uk/online-applications/applicationDetails.do?activeTab=neighbourComments&keyVal=M95J5FGH01C00>

Nevertheless, at the time, the SVA and the Vision Group for Sidmouth, amongst others contributing comments, questioned the quality of the Study:

“The EconIA is seriously flawed. The adverse economic impacts are far greater than has been assessed. The [SVA’s] critique concludes that:

- Impacts on employment in Sidmouth have been significantly underestimated. It is calculated that 69 jobs will be lost overall, rather than the 3 suggested by PBA.
- Impacts on spending in Sidmouth are similarly significantly underestimated. EDDC spending of £3.6m per annum has been discounted from the Assessment.
- Consultation of the public and stakeholders has been inadequate.
- The business questionnaire which was used to build the economic assessment is not fit for purpose.

<http://www.sidvaleassociation.org.uk/index.php?page=sva-objections-to-proposed-knowle-redevelopment> and

<https://www.visionforsidmouth.org/news/2012/september/vgs-submission-to-knowle-planning-application-sept12.aspx>

Despite the weakness of the Economic Impact Study, the DMC still rejected the planning application 12/1847/MOUT in that it “would have a significant detrimental impact on the economy of Sidmouth”.

Nevertheless, the Council has failed to address the issues raised by the DMC in 2013.

The Council was to hold a “Stakeholder Engagement Event” in 2014 asking “How will the new HQ help local businesses?” – stating that “Economic vitality is a key issue for the Council and we want to have an active dialogue with local business around their needs.”

And yet, the Chamber of Commerce has never been offered any such ‘dialogue’:

<http://futuresforumvgs.blogspot.co.uk/2014/09/knowledge-relocation-project-q-pages.html>

Similarly, a Business Space Review to consider how much employment land there is should have been forthcoming – but has never been published:

<http://eastdevon.gov.uk/media/427365/161014-os-agenda-combined.pdf>

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### **3 - Contrary to policy D1 (Design and Local Distinctiveness)**

for the following reasons:

1. The Design and Access Statement does not propose plans which are “locally distinctive”.
2. The proposals do not “Respect the key characteristics and special qualities of the area in which the development is proposed.”
3. The proposals do not “Ensure that the scale, massing, density, height, fenestration and materials of buildings relate well to their context.”
4. The proposals would “adversely affect: The distinctive historic or architectural character of the area.”

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

These reasons restate those given by the Development Management Committee when it rejected the outline planning application 12/1847/MOUT on 1st March 2013: <https://planning.eastdevon.gov.uk/online-applications/applicationDetails.do?activeTab=neighbourComments&keyVal=M95J5FGH01COO>

“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.”

<http://eastdevon.gov.uk/media/1167448/combined-dmc-agenda-020413.pdf>

The DMC considered that the application of 1st March 2013 would be “harmful to the visual amenity and character of Station Road” and that there would be “loss of amenity and character to this area”.

The plans under the current application 16/0872/MFUL do not propose building immediately adjacent to Station Road immediately.

However, it is clear that the proposed development would have a severe impact not only on Station Road, but well beyond the immediate vicinity.

Such is the design, the height, the massing and the sheer scale of the development – in the so-called ‘Dell’ taking up the car park, as well as the larger ‘Plateau’ above – that 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.

<https://saveoursidmouth.com/2016/05/18/visual-impact-of-developers-plans-for-knowle-raises-concerns/>

This has been demonstrated by several photo-montages:

1. The view over the Bickwell Valley Conservation Area:  
<http://futuresforumvgs.blogspot.co.uk/2016/05/knowle-relocation-project-far-more.html>
2. The views from Station Rd and Knowle Drive – using “an approximation of scale, based on measurements provided in the planning application, and using the real street scene” <https://saveoursidmouth.com/2016/06/13/knowle-drive-after-pegasus-life-plans-a-question-of-perspective> and [http://futuresforumvgs.blogspot.co.uk/2016/06/knowle-relocation-project-far-more\\_9.html](http://futuresforumvgs.blogspot.co.uk/2016/06/knowle-relocation-project-far-more_9.html)
3. The comparative height of the buildings on the Plateau – using “drawing software to automatically calculate heights/distances”:  
<https://www.streetlife.com/conversation/2dog614zkcortex/> and [http://futuresforumvgs.blogspot.co.uk/2016/06/knowle-relocation-project-far-more\\_10.html](http://futuresforumvgs.blogspot.co.uk/2016/06/knowle-relocation-project-far-more_10.html)
4. The mass of the footprint of the buildings on the Plateau – “by overlaying a couple of the maps from the Bat survey document ... on a Google satellite image”:  
<https://www.streetlife.com/conversation/2dog614zkcortex/> and <http://futuresforumvgs.blogspot.co.uk/2016/06/knowle-relocation-project-far-more.html>

Finally, 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:

<http://eastdevon.gov.uk/media/1167579/combined-dmc-agenda-120612.pdf>

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#### **4 - Contrary to policy EN9 (Extension, Alteration or Change of Use of Buildings of Special Architectural and Historic Interest)**

for the following reasons:

1. The proposed new development is “within the setting of heritage assets”.
  2. It does not “enhance or better reveal the significance of the asset”.
- <http://eastdevon.gov.uk/media/1515081/local-plan-adopted-text-subject-to-final-layout-changes-jan-2016.pdf>

These reasons restate those given by the Development Management Committee when it rejected the outline planning application 12/1847/MOUT on 1st March 2013: <https://planning.eastdevon.gov.uk/online->

[applications/applicationDetails.do?activeTab=neighbourComments&keyVal=M95J5FGH01Coo](https://applications/applicationDetails.do?activeTab=neighbourComments&keyVal=M95J5FGH01Coo)

“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.”

The reasons stated by the DMC for rejecting application of 2013 referred only to the Grade II Listed Lodge as being threatened. The current application should take into consideration the Grade II Listed Summer House – which immediately adjoins the proposed development.

In fact, the Heritage Statement put together by consultants Kensington Taylor in 2012 to accompany the rejected planning application 12/1847/MOUT referred to the Summer House – but was rather damning of the quality of the setting of the Grade II Listed Building.

As pointed out at the time, “The [Kensington Taylor] 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.”

<https://saveoursidmouth.com/2012/10/28/critique-of-the-heritage-statement-for-the-revised-plans-for-the-knowle/>

As far as the Heritage Statement which accompanies the current planning application 16/0872/MFUL is concerned, it 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.”

<http://planningapps.eastdevon.gov.uk/Planning/StreamDocPage/obj.pdf?DocNo=2267528&PDF=true&content=obj.pdf>

This has been vigorously contested by national heritage bodies:

<https://saveoursidmouth.com/2016/05/30/throwing-away-our-heritage-london-based-save-vehemently-objects-to-plans-for-knowle/>

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## **5a - Contrary to Strategy 4 - Balanced Communities**

for the following reasons:

1. The proposed development does not provide “a match between jobs, homes, education, and social and community facilities”.

2. It does not “complement the range of ages of the resident population”.
3. In a community which has “an overtly aged population profile”, this residential development will not “be suited to or provide for younger people and younger families”.

### **5b - Contrary to Strategy 34 - District Wide Affordable Housing Provision Targets:**

for the following reasons:

1. The proposal for a residential development does not provide for 50% of the dwellings to be affordable.
2. No evidence has been submitted “to demonstrate why provision is not viable or otherwise appropriate”.

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

Furthermore, table 20.5 of the **Five Year Land Supply and Sub-Housing Areas** states that the Council will seek to “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](http://eastdevon.gov.uk/media/1515081/local-plan-adopted-text-subject-to-final-layout-changes-jan-2016.pdf)

The Council’s approach is confirmed in correspondence with the developer before the formal planning application 16/0872/MFUL 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; 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.]

“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. ... 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.”

<https://www.whatdotheyknow.com/request/328928/response/811104/attach/html/5/KnowleUseClassLetter.doc.html>

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## **6 - Contrary to policy EN8 - Significance of Heritage Assets and their Setting**

for the following reasons:

1. The applicant has not carried out “a proportionate but systematic assessment following East Devon District Council guidance notes for ‘Assessment of Significance’ (and the English Heritage guidance “The Setting Of Heritage Assets”)”.
2. Considering the District Council's "Assessment of Significance" guidance notes, the applicant does not provide “a description of the significance of the heritage assets affected by the proposal”.

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

The applicant has provided this Assessment of Significance – and has in fact referred to the 1890s building as a “non-designated heritage asset”.

And yet, this report simply demonstrates how the applicant has sought to justify demolition through belittling the heritage value of the Victorian hotel at Knowle:

<http://planningapps.eastdevon.gov.uk/Planning/StreamDocPage/obj.pdf?DocNo=2267528&PDF=true&content=obj.pdf>

However, national and regional heritage bodies would disagree with this analysis:

“The alterations that have occurred both to the gardens and the house mean that neither meets the criteria for designation in a national context, though they are evidently highly-valued by the local community.” [English Heritage]

[http://www.sidmouthherald.co.uk/news/knowle\\_is\\_not\\_a\\_national\\_gem\\_english\\_heritage\\_1\\_1538331](http://www.sidmouthherald.co.uk/news/knowle_is_not_a_national_gem_english_heritage_1_1538331)

"It is important to note that statutory listing recognises nationally important heritage sites - but it does not follow that undesignated heritage assets do not merit protection or have no value." [SAVE Britain's Heritage]

<https://saveoursidmouth.files.wordpress.com/2016/05/save-britains-heritage-objection-to-knowle-planning-application-may-2016.pdf>

"Given the status of The Knowle as a local landmark retaining many features of interest, the building should be considered a non-designated heritage asset." [The Victorian Society] <http://futuresforumvgs.blogspot.co.uk/2013/07/knowle-victorian-hotel-heritage-asset.html>

Comments from members of the public on the current planning application 16/0872/MFUL are very critical of the lack of recognition of the heritage value of Knowle [for example: document 2310078]:

<https://planning.eastdevon.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=O5ICQCGHo1Coo>

These same concerns were voiced at the time of the earlier planning application 12/1847/MOUT of 2013. Here is one such comment:

The building

1. The Knowle is a significant and prominently-placed local landmark, in and overlooking a public park. Although altered due to change of use, the building has retained its external character created in the 1890s, which reinterpreted features such as the veranda from the older cottage on the site. Internally, the building retains features such as a Delft tiled fireplace and Pugin wallpaper.
2. A conservation area review of Sidmouth produced in recent years states that the area north west of the existing conservation area up to The Knowle should be assessed for potential inclusion in the designation. It points out that the first Sidmouth building noted in the original conservation area appraisal is Knowle Cottage, the earlier building on the site from which the surviving 1890s building was developed. This clearly acknowledges its significant place in the historical development of the town.
3. Given the status of The Knowle as a local landmark retaining many features of interest, the building should be considered a non-designated heritage asset. According to clause 135 of the NPPF,  
"In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset."
4. The heritage statement attached to the application does not provide any assessment of the significance of the main building and of the loss that would result from its demolition, focusing instead almost entirely on the listed summerhouse. The lack of information means that a balanced judgment cannot be made about the loss of the non-designated heritage asset.

<https://planning.eastdevon.gov.uk/online-applications/applicationDetails.do?activeTab=neighbourComments&keyVal=M95J5FGH01C00>

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#### **7a - Contrary to Strategy 3 - Sustainable Development:**

for the following reasons:

1. The proposals to not take the issue of "Conserving and Enhancing the Environment" into account, in that it fails to include "ensuring development is undertaken in a way that minimises harm and enhances biodiversity and the quality and character of the landscape".
2. The proposals do not include "includes minimising resource consumption, reusing materials and recycling".
3. The proposals do not include "Renewable energy development"

#### **7a - Contrary to Strategy 17 Climate Change and Renewable Energy: Transition to a Low Carbon Economy**

for the following reasons:

1. A development on this scale and mass does not contribute towards the UK's reduction in greenhouse gas emissions of 34% by 2020.
  2. There have been no incentives offered to the applicant "to upgrade and making renewable technologies a requirement of applications for refurbishment".
  3. There have been no attempts to "deliver the radical reductions in energy demand and greenhouse gas emissions required to support the national transition to a Low Carbon Economy".
  4. There has been no provision of "active support for energy efficiency improvements to existing buildings and the delivery of renewable and low-carbon energy infrastructure".
  5. These development proposals have not been "planned over the lifetime of the development to ensure that the maximum potential for reducing carbon emissions and minimising the risks posed by climate change are achieved".
  6. These do not present "Proposals for well designed, sustainable buildings".
  7. They "would cause harm to a heritage asset or its setting or existing mature trees".
  8. The proposals do not offer "wider social, economic and environmental benefits".
- <http://eastdevon.gov.uk/media/1515081/local-plan-adopted-text-subject-to-final-layout-changes-jan-2016.pdf>

Demolishing a building which is not posing a danger or is not about to collapse is not 'sustainable development' and is contrary to the Local Plan.

Instead, working to improve the energy efficiency of the current building should be a priority.

For example, in 2008, a Display Energy Certificate was issued giving Knowle the "more energy efficient" band C. This was accompanied by an Advisory Report from the Energy Assessor, who set out several recommendations such as more insulation, more double-glazing and a comprehensive heating strategy. In fact, the Council has made commitments to the band C rating across the District: "Working towards an ideal energy certificate level for each property, rather than just reporting what level it had; to aspire to making improvements that brought each property to a minimum of level C" [www.eastdevon.gov.uk/hrb\\_mins\\_300409.pdf](http://www.eastdevon.gov.uk/hrb_mins_300409.pdf) and <http://futuresforumvgs.blogspot.co.uk/2014/12/knowle-relocation-project-saving-energy.html>

Fundamentally, 'sustainable development' is about minimising carbon emissions and reuse/recycling/reduce - which means renovation rather than demolition of buildings: <http://refurbprojects-online.com/2014/04/scape-launches-renovation/> and <http://futuresforumvgs.blogspot.co.uk/2014/06/knowle-relocation-project-and-asset.html>

Finally, from an article on "Refurbishment v redevelopment or new build: A précis and interpretation for Knowle"

"Nigel Addy and Peter McCallum of Davis Langdon, an AECOM company, discuss creating and adding value through refurbishment. Interestingly, Davis Langdon were consultants to EDDC on refurbishment costs, but they were only asked to examine full refurbishment of all of Knowle, old and modern, despite the fact that this would have refurbished nearly double the floorspace required." <http://futuresforumvgs.blogspot.co.uk/2013/09/knowle-refurbishment-vs-redevelopment.html> and <http://futuresforumvgs.blogspot.co.uk/2013/07/a-truly-green-alternative-to-eddc.html>

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**8a - Contrary to policy D1 - Design and Local Distinctiveness:**

for the following reason:

1. The proposals would “adversely affect: Trees worthy of retention”.

**8b - Contrary to policy D3 - Trees and Development Sites:**

for the following reasons:

1. There will be “net loss in the quality of trees”.
2. The development will not “deliver a harmonious and sustainable relationship between structures and trees”.

The Comment from the Council’s Tree Officer of 24th May contains several “reservations” and concerns about certain “issues”:

<https://planning.eastdevon.gov.uk/online-applications/applicationDetails.do?activeTab=consulteeComments&keyVal=O5ICQCGHo1Coo&consulteeCommentsPager.page=3>

In particular, the Arboriculturist Report from Pegagus Life [document number 2267375: page 5] refers to “the root protection areas RPA and Construction Exclusion zones CEZ”:

<http://planningapps.eastdevon.gov.uk/Planning/StreamDocPage/obj.pdf?DocNo=2267375&PDF=true&content=obj.pdf>

Recent research has shown the root zone of mature trees reaches far beyond the tree canopy (as was previously assumed): [http://www.isa-arbor.com/education/resources/educ\\_Portal\\_RootGrowth\\_AN.pdf](http://www.isa-arbor.com/education/resources/educ_Portal_RootGrowth_AN.pdf) and

[http://www.isa-arbor.com/education/resources/educ\\_portal\\_rootgrowth\\_auf.pdf](http://www.isa-arbor.com/education/resources/educ_portal_rootgrowth_auf.pdf) and [http://www.forestry.gov.uk/pdf/FCRPO17.pdf/\\$FILE/FCRPO17.pdf](http://www.forestry.gov.uk/pdf/FCRPO17.pdf/$FILE/FCRPO17.pdf)

This puts at risk the mature trees Graded A such as 53, 54 and 76, which actually need further protection. In conclusion the “Dell” section of the development is too close to these trees.

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Jeremy Woodward

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

14th June 2016