Partial demolition, renovation and extension of Octagon Theatre, Yeovil. Expansion of main auditorium from 622 to 900 seats, construction of 2no. new cinemas, dance studio and expanded foyers. Construction of new theatrical fly tower and expanded backstage provision. | Octagon Theatre Hendford Yeovil Somerset BA20 1UX

Dear Somerset Council, Executive Committee

## **Summary**

In light of the recent announcements in relation to the increased cost of the construction work for the Octagon Theatre and the acknowledgement of the impact of inflation on the payback costs of the currently estimated £16million for the redevelopment of the Theatre, I would like to raise my concerns over continuing with this project. To be honest I believe this to have been a foolish project in the first place and these additional costs just aid to the weight of arguments for not moving forward with this project.

In high level (as I know many Councilors fail to read the full documentation provided), the reasons why this project can no longer go ahead are below, but in simplest terms "the cost out-ways any perceived (and yet undefined) benefits."

- Uncertainty over the cost of the budget for this project with a second stage of tenders still to go and an expectation from the project team that this will see a further increase.
- The fact that only one Tender could be provided goes against the approval process for tendering for projects. In a small-scale project maybe, this could be overlooked but a project of this size means the lack of businesses willing to tender highlights a flaw in the project.
- Again, in relation to the tender, the response from a potential bidder (who didn't tender) highlights that lack of a feasible project "Feedback from one of the anticipated bidders was that they did not believe the scheme was deliverable for the budget and so declined to participate."
- The risk of further increased prices on theatre goers who are already now paying a premium for their tickets following rises due to Covid-19, the Westland's development and already being levied for this project.
- This risk caused by the massive increase from interest rates for a publicly supported venue is unacceptably high annual interest repayments c£245k increasing to c£1,055k. The Octagon currently has been unable to operate without public funded support from Somerset Council therefore this additional burden will be unsustainable, over a possible 50-year payback period!
- The impact on timescales is clearly unknown, this "was" a community asset used by many local groups who are now struggling to find venues with the capacity, availability, and facilities to allow their groups to continue to perform during the period of closure. Already closed for 4 months without any real progress, a tender process that will not end till 2024 and even then, decisions will need to be made. Changes to the design will no doubt come in and this will require resubmission of planning and that's before further delays once the work starts. Realistically the Octagon will not reopen until at least 2027 / 2028. An 18-month project extended to 4 5 years!

It is worth noting that mounting costs and the increase in payback should come as "no surprise". This

was highlighted to all Councillors, by myself back on the 29th of January 2023, quite a few months before the final closure of the Octagon, stating "...also putting aside the potential for increased cost and time on this project, given the global cost of living crisis, rising inflation and the experience from the Yeovil Refresh" (see attached objection letter, also available on the Somerset planning portal <a href="https://ssdc.somerset.gov.uk/civica/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=11371983">https://ssdc.somerset.gov.uk/civica/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=11371983</a>) Therefore this was no surprise for the project team or Somerset Council and yet where was the contingency and active risk management?

The right decision needs to be made now, Somerset Council are now in a situation where they are gambling with public funds to support a project that has no clear budget, no end date, and no tangible measurable benefits. This is not an investment opportunity; it is a money pit. Halt this project, accept the hit on costs and reopen Yeovil's community asset ASAP.

#### Where was the benefit assessment?

I would like to highlight why this project should never have commenced from the concept stage in the first place. In simplest terms - Yeovil clearly does not need a larger theatre, it already has 3 (Westland, The Octagon and The Swan) and the provision of an extra 300 seats effectively takes the venue out of the reach of local Community groups, while only providing a small increase on the level of touring shows that the Theatre could attract. This did not justify the £27m budget assigned to the project.

This project commenced because it was perceived as an easy, visible project by our Council and not because it was what was right for the town. In simple terms they were looking for a quick win, a success story just as they had attempted and failed with the Yeovil refresh!

The Octagon redevelopment failed to carry out any form of benefits assessment for the town, failed to identify if this was "the one project Yeovil needed" instead of taking a bold step and coming up with a long term strategy for a rejuvenated Yeovil which would focus on an ambitious long-term approach to driving visitor numbers up in Yeovil, by expanding on what Yeovil needed, our Council focused on refreshing one of the few successful assets we have.

This "flagship" theatre has been identified as a key project in the regeneration of Yeovil, a town in severe need of regeneration, but just like the behind time and over budget Yeovil Refresh there is no business case which addresses just how it 'truly' benefits the wider Yeovil, no clear benefits assessment which highlights how these projects provide a return on publicly funded investments and no long term strategy to align with the potential £50M+ spent on Yeovil dying town centre? Business cases should be backed up with a clear assessment of the long-term benefits, this does not occur with SSDC / SC projects that are based on assumptions and high-level opinions from our out of Touch Councillors.

If Yeovil Town Centre was a prosperous, vibrant attractive location that enticed both Yeovil residents and visitors from further afield into our retail and leisure sectors then this proposal would provide added benefits to the town. But Yeovil is a town centre which is largely closed after 6pm, it has over 50% of its retails shops closed, a public transport system that shuts down at 17:30 every day and doesn't even run on Sundays and Bank Holidays and a spiraling issue of crime and antisocial behavior. The Yeovil

Refresh project has been downgraded time and time again due to cost and timescales, and the output is that it provides new paving slabs without addressing the unoccupiable commercial properties, the derelict site of the Cattle Market and the now empty Glovers Walk and Bus Station (what a way to greet visitors to Yeovil).

Personally I am a huge advocate of Yeovil and the positives we have, the Octagon was a positive, it doesn't need improving at this time, what Yeovil needs is more to attract visitors, A museum, Heritage Centre, Arts Centre, a regular market, better use of our green space, regular events, improved public transport, visitor centre and above all a commercial / retail Centre that our town can be proud of. Don't waste Yeovil's investment, save your extra 300 seats till we have all that!

## What now, too big a risk?

The issue now is, it's too late - we should have been putting forward long term strategy 5 years ago, 10 years ago. We could have been speaking with the Arts Council England about funding for a museum not an expansion of this venue. Now we are in a gambling situation should we "stick or Twist"? Carry on with a project that is already over budget and over schedule and likely to get progressively worse the further into the project we go, or cut our losses, get the Octagon back up and running and accept that this was an ill-conceived, badly planned, and clearly an SSDC /Liberal democrat vanity Project. Unfortunately, the loss to Yeovil is a lack of much needed investment but the decision is one that is clear to make, this has to be stopped before it's too late.

This project cannot proceed, if it does it will be at the cost of the taxpayer, through Town and County taxes, through additional levy's that are already heavily added to the Octagon and Westland's Ticket prices. To increase ticket prices and use of the facilities, will price households out of the ability to attend; what should be a community asset! The project team itself has highlighted that there are no certainties around this project, stating "It is now clear that assurance cannot be provided" (page 327 of today's meeting pack). This risk cannot be put on public funds.

Additionally, there is now no certainty around the overall cost of the project with a second tender phase still to take place between now and the beginning of 2024 again the project team themselves highlight the unknowns around the budget (Page 326)

- Feasibility study Oct 2020 said £23m
- RIBA stage 2 in Jan 2022 said £29m
- 1st stage contractor response estimated £30.7m
- Second stage tender Dec/Jan 2023 will say...?

Would you really invest in a business case that stated budget costs were unknown? This in turns has the potential impact on timescales for the project, already behind plan, the second phase of tendering is going to push into next year (2024) and with the possibility that a redesign and resubmission of planning will need to take place. This is likely to push any completion of a project of this size back to 2027 /28, what was proposed as an 18-month project will be closer to 4 to 5 years.

The sums themselves do not add up, the rate of interest increase, which the report suggests "could not have been foreseen" and yet the rest of the country seemed fully aware of (even I fixed my mortgage 18 months ago for the first time in many years!). Borrowing over a 50-year period at over £1 million per annum and the risk this has to the on-going ability to run a viable business or the risk to public funds that may never be repaid, while Somerset Council have to continue to bail out The Octagon running costs at even greater expense to the public on an annual basis. All this on a project that has no tangible benefits defined within its business case for the venue itself but more importantly not a single assessment has been carried out on how this project benefits Yeovil as a whole, sure we've heard potential benefits thrown around by Councillors trying to justify this project – but where is the business case that highlights the tangible, measurable benefits to Yeovil?

#### Backout now!

This project cannot proceed, if it does it will be at the cost of the taxpayer, through town and county taxes, through additional levies that have already heavily added to Yeovil's ticket prices therefore pricing many households out of the ability to use, what should be a community asset! While the level of risk for this project and the business has just become too great for this authority to invest public funds in (regardless of any promises of payback).

The Octagon should be reopened and any plans for redevelopment reconsidered at a later date and in line with a long-term strategy for Yeovil and the redevelopment of it's Town Centre, Our Council needs to halt knee jerk, quick win, high-cost projects and be held accountable for a long-term strategy with ongoing investment into Yeovil over a 10-year period.

### A reminder of why it should have never been approved at planning!

As an additional note I would like to draw the Committee's attention to the submission I made to the planning application and distributed to all Councillors at the time. This highlights very genuine reasons why this application should not have been approved in the first instance and yet with Somerset Council effectively marking their own homework (i.e. deciding on a planning application with the applicant being Somerset Council (or SSDC - but it's the same names and faces)) these concerns were ignored in favour of supporting this application.

Document sent to Somerset Councillors on Sunday 29th January 2023 19:01 Planning Objection to 22/02486/FUL | Partial demolition, renovation and extension of Octagon Theatre, Yeovil. Expansion of main auditorium from 622 to 900 seats, construction of 2no. new cinemas, dance studio and expanded foyers. Construction of new theatrical fly tower and expanded backstage provision. | Octagon Theatre Hendford Yeovil Somerset BA20 1UX

### Dear SSDC/Area South planning committee

I would like to draw your attention to a planning application scheduled for a decision at Area South Planning Committee for South Somerset District Council next Wednesday (February 1st) and highlight a number of planning reasons on why this planning application cannot be approved based on its current proposal.

https://publicaccess.southsomerset.gov.uk/onlineapplications/applicationDetails.do?activeTab=summary&keyVal=RH89N8OWGQ600

Putting aside some of the wider concerns over the size of investment into a single project when Yeovil is suffering in so many others areas and also putting aside the potential for increased cost and time on this project, given the global cost of living crisis, rising inflation and the experience from the Yeovil Refresh, there are a number of planning concerns that have been raised and should be addressed before this planning application gets approval. Firstly, there are a number of clarifications that need to be made in relation to the Planning Officers report.

# <u>Listed buildings and Conservation area.</u>

The planning application is to significantly increase a building that is in direct vicinity of two listed buildings, Historic England have stated that they have concerns over the visage of these buildings on the back of this proposal and highlights that there would be significant harm to the Grade II-listed coach house, and to the Yeovil conservation area. The Planning Officers report, however, choses to focus on the feedback of the second listed building where Historic England state, "a less than substantial degree of harm" The former significant harm has been ignored in the Planning Officers report.

The full quote from Historic England in relation to Hendford Manor states that "This harm would be significant, because it would harm the principal views of the principal elevations of Hendford Manor."

Additionally, what has been overlooked by both the Planning Officer and Historic England is the impact of the proposed material on both the listed buildings and the Conservation Area it sits alongside with the risk that this building could in time resemble a rust bucket! In addition to this, Cor-ten Steel has the potential for causing pollution of the local environment, this has not been considered or mitigated (more on Corten Steel below) within the design document.

### **Lead Local Flood Authority Feedback and other Water Concerns**

Somersets Lead Local Flood Authority raised a number of concerns with this planning application on 16th November 2022, specifically around drainage for the new building, while a number of these issues seem to have been resolved (although no reference to how these are resolved, appears in the planning portal) there are still as off 17th January 2023 several outstanding concerns around this proposal from the LLFA.

- Can the Applicant please provide justification for the increase in the proposed discharge rate from 4 (in the Drainage strategy report reviewed for the previous LLFA response) to 5 l/s? It appears that the blue roofs have been removed from the proposal (and now only permeable paving and filter strips are proposed in terms of SuDS? Appropriate justification should be given to why these changes have been proposed.
- No information/response has been provided regarding our previous comment on SuDS (point 3 of our previous response 16/11/22).

The LLFA therefore state in summary "the LLFA requirements for a Full Planning Application have not been addressed and the above issues need to be addressed/clarified before an appropriate planning condition can be set."

Yet the Planning Officer in their final report has stated "Discussions and negotiations are on-going with the Applicant and LLFA and further details and clarification is to be submitted. It is anticipated that the drainage strategy for the site will be agreed in due course and thereafter detailed specifications and implementation can be the subject" But it is clear that no final decision can be made, and no report should have been published until these issues had been resolved.

In addition to the above and specifically related to the drainage concerns raised by the LLFA, I have raised in both the planning application and to the LLFA the concerns over the use for Corten Steel for this building which has been identified as a potential pollutant without suitable drainage. I quote from one source.

"to the issues you have raised is the issue around ensuring there is no build-up of rain water and adequate drainage in relation to the Cor-ten Cladding Steel, failure to do so can result in rust-dirty water dripping onto adjacent surfaces and staining them permanently, or even worse, can cause pollution of the local environment. (nickel, iron and manganese). This could have a significant damaging effect on the area."

## **Landscape and Trees / Conservation area**

In relation to landscape and Trees the planning officer has consented to document what appears within the original proposal for the planning application but has however failed to address or even highlight the concerns raised by SSDC Tree Officer who in summary of this planning application has stated.

"In the absence of securing appropriate tree protection and landscaping details, I strongly recommend that we ought to avoid granting planning consent.

For the reasons I have outlined, I'm afraid that I am obliged to object to this proposal, because I believe it is contrary to the Council's objectives to preserve and enhance the quality and character of the local landscape and the features (trees) within it - in accordance with the following policies of The South Somerset Local Plan (2006 - 2028); EQ2: General Development, EQ4: Bio-Diversity & EQ5: Green Infrastructure.

Nor do I believe that the proposal currently provides suitably detailed measures to fulfil the Council's duty (to secure the planting of new trees and shrubs) as relates to The Town & Country Planning Act, 1990 (Para 197a - as amended)."

All the above leads to an understanding that this planning application is not ready to go to final committee for decision at this point and if it did and was approved would have been done wholly based on the timescales around a mid-2023 start date for this project (as communicated publicly by SSDC) and the time pressures around the dissolving of SSDC. While investment is encouraged it doesn't allow for procedures and processes to be overlooked to fast track because it is an internal (to the Council) project.

In addition to the above I would also like to highlight a number of other issues that have been raised on the Planning Portal by the public, this includes greater detail on the issues of Cor-ten Steel, the primary cladding for the building. While reference of these have been made in the Planning Officers report these have not been addressed in anyway, largely, we assume due to the speed in which this has been processed. These critical planning concerns should all be addressed before this planning application can be approved.

## Landscape and Trees / Conservation area

The loss of mature trees within the Country Park which should have TPO's on is of concern, SSDC should have had these mature trees under TPO however because it was SSDC land they have refused to do so. Now there is a proposal to destroy 13 mature trees. While replacing these is a positive output this is a significant loss of trees of considerable age that SHOULD have been under TPO.

The removal of these trees means that this planning application is not complying with the following policies

- South Somerset Local Plan 2006-202 Policy EQ2 seeks to achieve high quality development which promotes the local distinctiveness and preserves or enhances the character and appearance of the area.
- South Somerset Local Plan 2006-202 Policy EQ3 seeks to conserve and where appropriate enhance heritage assets.
- National Planning Framework Section 15 Conserving and enhancing the natural environment.
  Comment submitted date: Tue 15 Nov 2022

### **Cor-ten Steel**

The use of Cor-Ten Steel as the primary material for cladding on the outside of the building raises significant concerns over the impact of the look of the area especially in such proximity to two listed buildings and a conservation area. While Cor-Ten seems like a great solution to 'blend' in with the Country Park. There is sufficient risk going forward in the way in which this material 'evolves' and it has many risks which could see a very different future look to the outside of this building and just look like a rusty building! For those of you not familiar with Cor-Ten it is the same material used for the Angel of the North. From a distance it looks great, up close (as the Octagon visitors would see it) not so good and also note the Angel of the North is constantly maintained by a steel company to ensure it is treated correctly and Cor ten has to be kept clean at all times. Who will be maintaining the Octagons Cor-Ten? Examples below highlight the concerns of the future look of this imposing building.





When looking into Cor-ten as a solution there are many

don'ts related to this material, Considerations such as

- Don't get mud, grease, oil, paint, cement, mortar and other substances, and keep leave piles away from it. Don't build with Cor-ten is in contact with other metal materials which has a negative impact on the evolution of this material. What metal is being used for the framework of the building?
- Ensure there is no build-up of rainwater and adequate drainage, failure to do so can result in rust-dirty water dripping onto adjacent surfaces and staining them permanently, or even worse, can cause pollution of the local environment. (Nickel, iron and manganese). Given the concerns from LLFA the likelihood of drainage problems seems high.

If you examine the designs the plan is to have Cor-ten bordering directly with a lawn area (page 14 Section 4 Part1 Architecture) therefore being in direct contact with mud, which will splash up the building during rainy weather. There is no mention of the material to be used alongside Cor-ten for the internal structure of the building, therefore this planning application is unable to confirm if there is a risk of contact with other metals that would negatively impact the

Cor-ten. Finally, it has already been noted the concerns over drainage by the LLFA, however the risk that this could cause pollutants into the locality highlights why this planning application cannot be approved until a full assessment of the management of water and drainage and the behaviour of Cor-ten steel within the proposed location.

By using Cor-ten there is no guarantee about what the building will look like going forward, therefore designs presented do not provide a clear indication of the impact of the area on this development and because the Cor-ten can evolve in different ways based on sun exposure, rain exposure wind and contact with other materials there is no guarantee of consistency.

In addition to this Cor-ten steel is known to have an issue with rust run off during rainy weather which then stains the ground around it, some examples of this can be seen below. Given the wide path areas and the extensive use of Cor-ten Steel on the building, it surprises me that there are no plans for mitigation of this issue within the formal plans?



Details of this staining issue can be found in many articles in relation to the use of these for planters in the garden, one such example of the issue can be found <a href="https://niceplanter.com/will-my-corten-planters-stain-surrounding-area-with rust-or-runoff/">https://niceplanter.com/will-my-corten-planters-stain-surrounding-area-with rust-or-runoff/</a>

However, and most relevant I believe; to the issues you have raised is the issue around ensuring there is no build-up of rainwater and adequate drainage in relation to the Cor-ten Cladding Steel, failure to do so can result in rust-dirty water dripping onto adjacent surfaces and staining them permanently, or even worse, can cause pollution of the local environment. (Nickel, iron and manganese). This could have a significant damaging effect on the area.

This issue has been documented in a number of research papers and are referenced in

these websites, https://www.cantorialluminio.it/en/cladding-of-facade-in-sheet-

#### corten/

# https://www.sciencedirect.com/science/article/abs/pii/S0269749116301828

Proper analysis of how Cor-ten Steel will react into the proposed location, must be carried out before this is a allowed to proceed – to do otherwise not only risks the character of the area but has a potential to pollute waters used by our local wildlife.

Therefore, not complying with

SSDC Local Plan 2006-202 Policy EQ2, EQ3 or NPPF section 16 /17

# **Impact on Community Groups and use of a Community Asset**

The increase in capacity actually risks 'sizing out' the Community and Amateur shows currently put on at the Octagon, many of these are far from fully attended and this change would risk (over)' half empty auditoriums causing these community groups to look elsewhere and removing the opportunity for young and amateur performers to perform on a professional stage! In addition to this the cost of a larger venue would price many local performing clubs out of being able to use this facility. If this happens what are the alternatives Westlands does not have the back of house facilities and The Swan Theatre is often too small

Consideration also needs to be given on the impact of price, caused directly by this proposal and the ability for Yeovil residents ability to be able to afford this "Community Theatre". Prices have risen sharply over the past few years due to Covid-19 and the cost-of-living crisis. This proposal will see the Octagon place an additional Levy on tickets to support the cost of this development and the cost-of-living crisis is not going away anytime soon – the risk of pricing out the general user and in particular families is extremely high.

Therefore, this proposal risks the community aspects of the Octagon and does not therefore comply with • South Somerset Local Plan 2006-2028 Policy EP15 supports the provision of new community facilities.

## **Impact to Other Local Businesses**

There is an inclusion of 2 Cinema screens in this proposal, this is a community Theatre, and the addition of screens changes its use. There is already have a Cinema in Yeovil at the leisure park which would be directly impacted by this competition and would risk that business.

Cineworld is already impacted by SSDC's decision to screen mainstream films at Westlands. A loss of Cineworld, would have a knock-on effect to the other business within that Leisure Park (which already has a number of empty premises), this will have an overall negative impact on the vitality of the Town.

Therefore, this planning application does not conform with

- South Somerset Local Plan 2006-2028 Policy EP11 supports proposals that enhance the vitality and viability of the town centre.
- National Planning Framework Section 7 Ensuring the vitality of town centres.

## **Public Transport**

The planning application highlights the need for providing adequate public transport to the location the published travel plan states and I quote. "Having regard to the proximity of the bus stops, the frequency of buses and the areas that the existing local buses serve, the Theatre is accessible by public transport."

While this may be adequate for daytime travel, the majority of performances at the octagon take place in the evening for which there is no public transport as Yeovil has no buses running in the evening. Also, worth adding that there are no buses on a Sunday - therefore adequate public transport is not available and the only way for the majority of visitors to the Octagon both currently and within the future is by Private Car - causing increased traffic, lack of parking spaces and increased environmental impact.

Therefore, this planning application does not comply with the following.

- South Somerset Local Plan 2006-2028 Policy TA1 seeks to reduce single car occupancy and the need to travel, or encourage the use of more sustainable travel, or alternative fuels where travel is necessary. South Somerset Local Plan 2006-2028 Policy TA5 sets out the Council's policy relating to the transport impact of new development and encouragement for sustainable transport.
- National Planning Framework Section 9 Promoting sustainable transport.

## **Car Parking**

The issues of parking have not been resolved through this planning application, there is a significant shortfall in the current Petters way Car park for the Octagon even when it is not at full capacity already, and the proposed solution for car parking at the nearby Goldenstones carpark is already one used as an overflow for the Octagon. We also need to remember that these car parks are used for other reasons such as the Gym and pool, Ninesprings and the Town Centre.

There are peak times in the evenings during the summer when Goldenstones car park is largely full already (with the community's use of Nine Springs Country Park) and the Petters way Car park is used extensively during the day for Town Centre which often clashes with Matinee performances.

The report from the planning officer highlights a potential 1000 plus users at any one time once redeveloped. The current primary car park for the Octagon (which is also a general Town Centre car park and used by those who work in offices close by) is 211 spaces, this is already a shortfall for the 600-seater theatre that the Octagon is now. Proposals in the Transport Plan (see planning application) suggest that additional space can be provided in a number of areas.

- Goldenstones Car park this is a small walk away but up a large gradient hill and therefore not suitable for many. The Goldenstones car park also provides parking for a Gym and Pool as well as the local Country Park. This car park is heavily used in the summer evenings when most of the Theatre shows would take place.
- Tesco underground car parking this has been highlighted as an alternative park area for Octagon users, but due to antisocial behaviour this is locked from 7:30pm each evening. Therefore, cannot be counted. Tesco Main Car park this car park is a supermarket car park and is restricted to supermarket users only and a maximum of two hour stay. Therefore, not a suitable alternative parking location.
- It should also be noted that matinee shows tend to take place on a Saturday for shows, this would coincide with the busiest day for the town centre and therefore has a potential significant clash of usage for all the car parks above leaving a huge shortfall for a potential 1000 visitors.
- Once again it is worth noting that Yeovil has no evening bus services therefore any evening shows and car parking capacity cannot be mitigated by the use of public transport - the only option for attendees of the Theatre is to drive.

Below was an example day of the Peters Way (the primary car park for the Octagon) car park on a Thursday during the Christmas period when the Pantomime was taking place, attendance for this show was around 80% of capacity however as you can see the Petters Way Car Park is full (save for a couple of disabled spots).



Petters Way is a poorly designed car park with a significant gradient and regardless of 'other car parks' around town, Octagon visitors will head to Petters way as their first option, an additional several hundred cars trying to manoeuvre on a sloped car park with drivers needing to reverse out due to lack of space will cause chaos. Regardless of minimal parking requirements that are suggested for a proposal of this type, the hard facts are that there is not enough parking for this service as anyone attending a show at the octagon will testify too this.

## Therefore, not complying with

 South Somerset Local Plan 2006-2028 Policy TA6 states that parking standards for new developments should be undertaken in accordance with the Somerset County Council Parking Strategy.

While it is positive to see investment into Yeovil (although maybe over-investment in a couple of projects was the wrong approach for SSDC) this does not get away from due diligence within the planning approval process and as can be clearly seen from the issues provided within this document, there are currently too many concerns and unknowns around this planning application to allow it to be approved.