Regulation 14 Representations on the Draft Puriton Neighbourhood Plan.

On behalf of Mr & Mrs Hanham and Coln Residential.

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Author: Chris Marsh

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1. Introduction

1.1. These representations are prepared on behalf of Mr and Mrs Hanham and Coln Residential in respect of the draft Puriton Neighbourhood Plan, which is currently the subject of public consultation.

1.2. Our submission relates specifically to the parcel of land identified in the draft plan as potentially safeguarded in part for expansion of, and additional facilities for, Puriton Primary School, and is prepared following direct engagement with the headteacher and chair of governors at the school.

1.3. The parcel of land within our client's control is shown below. As can be seen, this extends between 'Puriton Hill' to the West, and 'Hillside', to the East, and is enclosed to the south by the embankment to the new Gravity bypass.

Figure 1: Land ownership plan

1.4. Puriton Primary School occupies a regularly-proportioned site effectively inset to the north-east, which is currently well enclosed by mature boundary vegetation and accessed directly from Rowlands Rise, to the North.

1.5. There is an existing public right of way, footpath BW28/4, that runs East-West across the northern boundary of the school and our client's land, which seems to be well used by parents and pupils at the school during drop-off and pick-up times.

1.6. It is hoped that the commentary provided here proves productive in informing the final form of the emerging Neighbourhood Plan, and helps to facilitate the most successful outcomes for the proposed safeguarded land.

2. Neighbourhood Plan Progress

2.1. In line with the Neighbourhood Planning (General) Regulations 2012, the journey towards a Neighbourhood Plan for Puriton began with the designation of the 'Neighbourhood Area', which was approved by the district council, Sedgemoor, on 2 February 2017.

2.2. This led to the formation of a steering group for the project, comprised of volunteer local residents, who first met in May 2017 and who, through successive meetings, have overseen the evidence base and led the production of a first draft plan for statutory consultation with stakeholders.

2.3. The draft Puriton Neighbourhood Plan, pre-submission version, was published in July 2022 and has subsequently opened to public consultation in accordance with Regulation 14. The deadline for comments is 5 December 2022, and all comments will be recorded and taken into account in informing further revisions and refinements of the draft Plan.

2.4. It is this stage at which key stakeholders may effectively engage, and pursuant to which these representations are submitted to the Neighbourhood Plan Group for consideration.

2.5. This will then progress through further consultation as necessary prior to the creation of a final 'submission' version, to be submitted to the Local Planning Authority and examined independently to ensure soundness.

2.6. The final key stage in the process is that a 'sound' Neighbourhood Plan proceeds to local referendum, which is decided by majority outcome. If supported by the majority of voters, the Plan can then be formally 'made' as part of the statutory development plan, having precedence in planning decision-making alongside the adopted Sedgemoor Local Plan 2018.

3. Policy Context

3.1. Neighbourhood Planning is a product of the localism agenda and seeks to provide greater power over planning decision-making to local communities, by enabling them to produce a document which, once 'made' following support at referendum, becomes part of the statutory development plan.

3.2. Neighbourhood Plans are prepared on a 'neighbourhood'-wide scale, in this instance defined by existing parish boundaries, and are prepared in accordance with the Neighbourhood Planning (General) Regulations 2012, Town & Country Planning Acts 1990, whose 'basic conditions' they must meet in order to come into operation, and the Neighbourhood Planning Regulations 2017.

3.3. The National Planning Policy Framework ('the Framework') sets out the basis of the role of Neighbourhood Planning, setting out at Paragraph 13 that:

"The application of the presumption [in favour of sustainable development] *has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies."*

3.4. This is to say that Neighbourhood Plans should be consistent with the policy framework at district/borough/unitary level and with national strategic policy but should serve to refine the application of these policies through targeted direction of development within the relevant neighbourhood area through non-strategic policies.

3.5. Paragraph 29 states:

"Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies."

3.6. The national Planning Practice Guidance (the PPG) identifies that:

"Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area."

3.7. The Guidance also clarifies:

"A neighbourhood plan should, however, contain policies for the development and use of land. This is because, if successful at examination and referendum (or where the neighbourhood plan is updated by way of making a material modification to the plan and

completes the relevant process), the neighbourhood plan becomes part of the statutory development plan."

3.8. In accordance with Paragraph 48 of the Framework, the weight to be afforded to policies in an emerging plan – including Neighbourhood Plans – will depend on certain factors:

"Local planning authorities may give weight to relevant policies in emerging plans according to:

a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)"

4. Draft Neighbourhood Plan

4.1. The draft Puriton Neighbourhood Plan, currently subject of public consultation, contains a number of land use policies including the safeguarding of land adjacent to Puriton Primary School, the extent and location of which is shown below in blue.

Map 9: Safeguarded Land South of Puriton Primary School

Figure 2: Excerpt from Draft Puriton Neighbourhood Plan

4.2. The associated draft policy, LFA3 'Safeguarding Land Adjacent to Puriton Primary School', states:

"1. Land adjacent to (south of) Puriton Primary School (defined on Map 9) will be safeguarded for school use for one or more of the following uses:

i) A drop-off and collect turning area to remove traffic causing congestion at the start and end of the school day on Hillside, Webbers Way and Rowlands Rise; and /or;

ii) Additional green open space; and / or;

iii) Provision of a multi-use games area; and / or;

iv) Additional indoor or covered teaching space."

4.3. The supporting text explains under paragraph 7.3.1:

"In addition, there are a number of issues and opportunities related to the primary school. Levels of traffic and parking on surrounding roads during school drop-off and collection times are relatively high (particularly on Rowlands Rise, but also to a degree on Webbers Way and Hillside) and lead to local congestion during these peak times. This issue, together with a current deficit in outdoor provision for play and sport, the potential need for the school to increase capacity (either indoor or outdoor) to accommodate additional children from the potential new development south of Woolavington Road and introduce more flexible playtime and outdoor activity / learning space following lessons learnt from the coronavirus pandemic, suggests a need for additional land to be used adjacent to the school to resolve some of these challenges. The Plan therefore designates an area of land to the south of the school to be safeguarded for future development of these potential improvements.

In terms of the possible land reserved for the school, from discussions between the District Council and County Council (as Local Education Authority), it is understood that an area of 0.5 hectares would be appropriate to provide flexibility in terms of accommodating additional classrooms and the required outdoor space including the ability to address a current deficit for all weather space. This amount of land would also enable the provision of a drop-off area for parents and children if it can be delivered and therefore remove some of the parking and associated congestion that takes place in Rowlands Rise which causes disruption to existing residents."

4.4. From the supporting text, it is not known whether the Local Education Authority has to date provided any further indication of intended expansion priorities for the school, or what funding currently exists for these, although it is understood that the LEA has been consulted on the draft NP and therefore may respond shortly in this regard.

4.5. From an informal meeting that took place on 19 October 2022 with the headteacher and chair of governors of the primary school, it is understood that the indicated uses and extent of land identified above have not yet been subject of discussion with staff/governors, and are not informed by the identification of priorities by the school itself.

4.6. Likewise, until the draft plan was published for consultation, my clients had not been aware of the proposed allocation, or otherwise engaged previously to discuss how the identified priorities may be facilitated through land in their private ownership.

5. Commentary

5.1. In principle, my clients are supportive of the aspiration to deliver enlarged and enhanced education facilities at Puriton Primary School to cater for recent and forecast increases in pupil numbers and to provide an enriched education experience for children, and for the wider benefit of the local community.

5.2. They are also supportive in principle of a locally-led Neighbourhood Plan process being the vehicle by which suitable land is identified for this purpose, as this enables meaningful local engagement with key stakeholders to maximise the prospect of delivering the best possible outcomes.

5.3. On this basis, further commentary on the current draft policy LFA3 is set out below, organised thematically.

Use

5.4. In respect of the draft policy, my clients note the wide range of potential uses identified for the proposed safeguarded land. These are addressed in turn below.

A drop-off and collect turning area to remove traffic causing congestion at the start and end of the school day on Hillside, Webbers Way and Rowlands Rise

5.5. It is noted that the initial focus of the supporting text to LFA3 is on current issues with parking, traffic levels and congestion during drop-off/pick-up times on roads around the school, chiefly at Rowlands Rise but also other neighbouring routes.

5.6. We have conducted an informal survey of conditions at school pick-up time on an ordinary midweek day during the Autumn term. The weather was fair, and we witnessed a considerable number of parents with children, some on bikes/scooters, using the routes east and west along the public right of way, as well as northward on foot via Rowlands Rise, to leave the school site.

5.7. We did also witness a proportion of ad-hoc collections by car around Rowlands Rise, although with very little evident conflict in terms of awkward manoeuvring, inconvenience to pedestrians, parking across driveways, etc, during this brief snapshot.

5.8. As a general principle, we would expect transport improvements to focus on incentivising active travel solutions rather than additional accommodation for journeys by private car, in an effort to promote more sustainable modest of transport.

5.9. Speaking with representatives of the school, it is understood that similarly there is no perceived acute problem with parking at Rowlands Rise and, generally speaking, in previous ad-hoc travel surveys the school has recorded an increasing amount of walking/cycling/ scooting to school, potentially aided by an increase in pupils living in Puriton due to recent housing development, something staff are keen to promote.

5.10. Furthermore, given that the school caters for children as young as four and that younger children are typically more likely to be brought into school by parents, we are told they are very unlikely to be simply dropped off, with parents instead wishing to park and escort their child to their classroom.

5.11. As such, designed parking facilities would need to be able to accommodate a c.5-minute turnaround by parents when in use, as well as two-way traffic between the village and car park via 'Hillside'. Without consistent knowledge of exactly how many users this would entail, and how the facilities would be managed, it is difficult to anticipate the area of land required.

5.12. At present, 'Hillside' is a width-restricted and relatively tranquil residential street at the southern edge of the village, with a verdant character afforded by boundary vegetation and landscaped front gardens. Although not a no-through road, it is lightly trafficked and unaccustomed to concentrated periods of high vehicle frequency.

5.13. We are concerned that using land in the location currently shown to the South of the school for additional parking/drop-off facilities would give rise to an undue increase in vehicle movements that would be deleterious to the amenity of existing residents, highway safety and the quality of 'Hillside' as a recreational route.

5.14. Unlike Rowlands Rise, 'Hillside' has no convenient means of vehicles turning round (save for private driveways), and there is therefore a risk that if a new parking area were full or simply appeared congested, drivers would obstruct private driveways or the footway/carriageway once they had committed to accessing the school via this route. Clearly this is not desirable either for the school or for existing residents.

5.15. Given the requirements outlined above, a significant section of the existing mature boundary hedgerow to the West of 'Hillside' would need to be removed to accommodate two-way vehicle movements with appropriate turning radii, visibility, etc. It is likely this would, independently, be deleterious to the pleasant character of the area.

5.16. We would therefore not be supportive in principle of using additional land to the South of the school (or indeed elsewhere) for additional parking or drop-off facilities; we consider this would be impractical and a retrograde step against the objectives of promoting active travel modes.

Additional green open space

5.17. On visiting the school on 19 October, we were kindly shown around the school grounds, which include a large, flat playing field, forest school area, and nature areas extending to the South of the main complex of buildings.

5.18. We were told that so far as the school staff and governors are concerned, this versatile space is ample in size and provides a very high-quality enriching experience for pupils, and not something considered to be under pressure or in need of enlargement.

5.19. We also note that the outdoor space's southern boundary is enclosed by a weldmesh fence and mature hedgerow, including a number of sizeable trees, much of which would likely require removal if the area were to be extended to provide meaningful additional outdoor space, for reasons of both efficiency and supervision.

5.20. Based on conversation with the school, we would not therefore anticipate any immediate need for additional green open space and consider the extension of such into land to the South of the existing school grounds to be undesirable and impractical.

Provision of a multi-use games area

5.21. In meeting with the headteacher and chair of governors, we were informed that current playground provision at the school is considered inadequate, and the reliance on a single area very difficult to manage on wetter days, when pupils cannot use the wider grounds at break times.

5.22. The school would therefore be highly supportive of the opportunity to create an additional, potentially separate multi-use games area and playground available for use by pupils within and outside of teaching hours, giving greater space, flexibility and the facility to divide areas by age range, etc.

5.23. It was however jointly noted that there is a clear benefit and desirability in having such an area situated in close proximity – ideally adjoining – the main school buildings, enabling it to be easily accessible in poorer weather, and also convenient for PE and other ad-hoc educational use.

5.24. For this reason, such an area would need to be situated around the northern part of the school site, close to the main cluster of teaching accommodation. In this regard, the proposed safeguarded land is impractical in its location, being separated from the main accommodation blocks.

5.25. We would therefore support the provision of an additional or extended multi-use games area for the school, subject to this being positioned in a logical and efficient way. This could be delivered alongside enlarged teaching accommodation, as discussed below.

Additional indoor or covered teaching space

5.26. It is understood from recent school capacity reporting, including the representations of Somerset County Council as the Local Education Authority (LEA), that what was in recent years an under-subscribed school is now very close to full capacity, a matter of single digits.

5.27. In order to ensure appropriate class sizes and maintain some flexibility (for instance when existing pupils' younger siblings get to school age and wish to attend from out of catchment), the school anticipates an imminent need for additional indoor teaching accommodation.

5.28. The school has noted that this would provide headroom for future pupil pressures (stemming chiefly from new housing development around the village) as well as ensuring that other spaces remain available for use for additional educational intervention and welfare provision, rather than becoming overflow classrooms.

5.29. As with the multi-use games area, there are severe restrictions on the delivery of such space to the South of the school grounds, effectively divorced from the existing cluster of teaching buildings in the northern part of the school site.

5.30. Aside from incurring wasteful abnormal costs of providing infrastructure to the land, this would result in a lack of integration with existing shared indoor facilities (for instance the school hall and library).

5.31. Accordingly, we are supportive of the provision of additional indoor teaching accommodation as this will clearly be required in the relatively near future. We do not, however, consider the safeguarded land as indicated to be appropriate for this purpose.

Size

5.32. It is noted that the supporting text to draft policy LFA3 indicates a required area of c.0.5ha for school expansion, and from an approximate measurement this appears to correlate to that indicated within Map 9.

5.33. While we have no significant concerns about the appropriateness of such an area, in order to ensure that future uses are not unduly constrained, the amount of land required will depend ultimately on the requirements of the identified end use, and may be reduced if opting for a less space-intensive use than a drop-off area, for instance.

5.34. Refinement of the uses identified under LFA3 should therefore then inform the final size and proportions of the land to be safeguarded.

Location

5.35. As intimated in the discussion above, we have significant concerns in respect of the location of the proposed safeguarded land as currently indicated on Map 9, and do not consider this to be suitable in practical terms for any of the proposed uses, whether or not these are independently supported.

5.36. It is notable that Map 9 does not reflect circumstances 'on the ground' as it does not show the recently implemented Gravity bypass to the South of the village or reflect the associated engineering works that strongly influence the context of land immediately northward.

5.37. The below overlay shows how the proposed safeguarded land interacts in practice with the extent of my clients' land ownership, oversailing this at its southwest corner into land currently controlled by Gravity. This would thus further inhibit effective delivery of any expansion of the school.

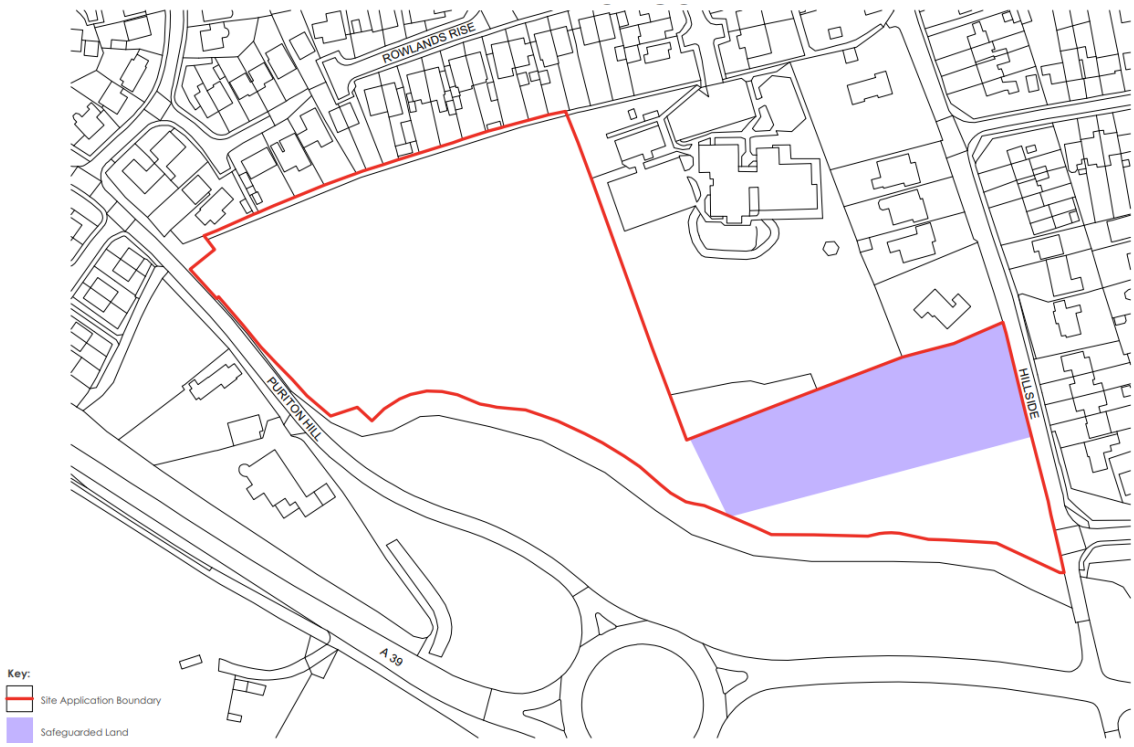

Figure 3: Land Ownership, Proposed Safeguarded Land Overlaid

5.38. In practice, even if reduced or re-proportioned the intervention of these works in conjunction with the safeguarded land as currently shown would create a somewhat awkward triangular 'island' of severed landholding to the southeast of the school.

5.39. From our client's perspective, being divorced from the remainder of their field in this way and without independent access, this 'island' would become effectively unusable. On this basis also, from a practical perspective and in seeking the most efficient use of land, we would not support the safeguarded land's location as currently shown.

Alternatives

5.40. We would strongly advocate the relocation of the proposed safeguarded land to a more practical position at the northwest boundary of the existing school site, retaining the same total size and proportions as appropriate to future use.

5.41. We have therefore taken the liberty, based on discussions with the school, of producing an indicative plan showing how this could instead be delivered, as shown below.

Figure 4: Illustrative alternative safeguarding location

5.42. Notwithstanding the shortcomings identified in respect of the safeguarded land as currently shown, we consider this approach to be justified for a number of key reasons, summarised below.

- This would allow the co-location of teaching accommodation/multi-use games area where it is most practical and efficient for the benefit of the school and its pupils;
- This would not require the partial or wholesale removal of the more mature/ substantial vegetation along the southern site boundary;
- This would integrate with the existing school entrance, aiding drop-off / pick-up, and with the potential to create a safe, staffed, secondary access point directly onto the public right of way;
- This area offers greater flexibility in terms of the spatial proportions of the allocation, and means of boundary treatments, etc; and
- This would not sterilise the use of the wider landholding within our client's control.

5.43. Through our early engagement with the school to best understand their own requirements and aspirations, they have helpfully summarised these in the letter attached at **Appendix 1**, which it is hoped will prove helpful the Neighbourhood Plan Group in contextualising the commentary set out in this document.

Appendix 1: Letter from Katie Williams, Headteacher

5.44. As we are supportive, in principle, to the relocation of the safeguarded land as shown above, we would welcome the opportunity to engage further with the Neighbourhood Plan Group, together with the school staff and governors and the LEA, to refine the detail of the emerging policy and to explore the delivery vehicles available to ensure this can be achieved in practice.

6. Representations on behalf of Coln Residential

6.1. This section sets out the representations of Coln Residential, who are working closely with the landowners, Mr and Mrs Hanham, in respect of the prospective delivery of housing to facilitate the realisation of the school expansion as currently anticipated by the emerging Neighbourhood Plan.

Neighbourhood Plan Approach

6.2. Presently, the draft Neighbourhood Plan does not allocate land for housing, stating that the scale and location of new housing should continue to be informed by the existing strategy set out in the adopted Sedgemoor Local Plan.

6.3. Notwithstanding, allocating additional land for housing is specifically within the ambit of functions a Neighbourhood Plan can perform, and we would be supportive in principle of the identification of additional sites for housing.

6.4. It is noteworthy that for Paragraph 14 of the Framework to be engaged, and for a Neighbourhood Plan to therefore assume greater weight in the event that the presumption in favour of granting permission applies (for instance, in the absence of a five-year housing land supply), this requires *inter alia* on the Neighbourhood Plan's allocating land for housing.

6.5. As such, at a more strategic level, the allocation of land for housing through the Neighbourhood Plan provides greater control over resisting unwelcome speculative developments that conflict with the settlement strategy in practice.

Allocation for Housing

6.6. The site is located adjacent to the existing development boundary for Puriton and is bounded on three sides by existing residential properties, and on its remaining southern boundary by the elevated route of the new Gravity bypass.

6.7. The site is therefore very well enclosed by existing development and forms a logical 'rounding off' of the village, providing a residual c.2.4 hectares to accommodate residential dwellings, infrastructure, strategic landscaping and public open space once excluding the safeguarded school land.

6.8. Delivery of housing in this location would unlock safeguarded land for the school's expansion, whose transfer to the school/LEA could be secured by Section 106 Agreement in order to ensure timely expansion to accommodate additional demand for places arising from new homes.

Capacity

6.9. We anticipate the site, excluding the land to be safeguarded for school expansion, would be capable of accommodating c.70no. dwellings, having regard to relevant constraints and opportunities.

Constraints

6.10. The key constraints for the site are summarised as follows:

Constraint	Comment
Spatial Strategy	Outside but adjacent to the settlement boundary of Puriton
Flood Risk	Flood Zone 1 (lowest risk)
Heritage	No listed buildings, no conservation area Area of High Archaeological Potential c.200m north-east
Ecology	No designations
Landscape	No designations
Arboriculture	No TPOs
AONB	No
Greenbelt	No
PRoW	BW28/4 adjacent to North

Table 1: Constraints Assessment Summary

6.11. In the light of the above, it is clear that the site is not subject of any fundamental constraints that should unduly limit the site's potential for development.

Accessibility

6.12. The site is well related to local services and facilities, with approximate walking distances (taken from the centre point of the northern site boundary, at which a footpath connection could be sensibly achieved) set out below.

Facility	Walking Distance (approx.)
Puriton Primary School	100m
Village Hall	290m
Court Farm Butchers Convenience Store	250m
Puriton Inn Public House	290m
Day Nursery	300m
Puriton Post Office	400m
St Michael's & All Angels Church	450m
Puriton Sports Centre	650m

Table 2: Summary of Walking Distances (Approximate)

6.13. As shown above, most day-to-day facilities are situated less than 0.5km from the northern site boundary, providing safe and convenient walking and cycling routes to promote sustainable travel choices.

6.14. The site is otherwise located c.300m walking distance from bus stops on Riverton Road, and 280m from stops on Hall Road, both of which provide services to Glastonbury/Wells and Axbridge via the no.66 and no.75 routes respectively, and to Bridgwater in the opposite direction.

6.15. Accordingly, the site is accessibly and sustainably located having regard to the range of available local services and facilities, and the promotion of travel by non-car modes.

Dwelling Mix

6.16. Having regard to draft policy H2 of the emerging Neighbourhood Plan, the site is capable of delivering a range of dwelling forms and sizes, taking account of the need for affordable housing and smaller properties suitable for first time buyers.

6.17. There is also scope for the provision of some bungalows and/or maisonettes to provide a suitable proportion of accessible and adaptable homes suitable for the elderly and those with mobility issues.

6.18. The site is thus able to support the creation of a cohesive, mixed addition to the community at Puriton through an appropriate range of dwelling types and sizes.

Site Access

6.19. Read with the commentary in respect of accessibility restrictions along 'Hillside', to the East of the site, vehicular access would be anticipated via 'Puriton Hill', at the site's western boundary.

6.20. This is likely to entail a degree of tree removal, although this would be kept to a minimum and compensated through new tree and hedge planting within the development.

6.21. We would also anticipate additional pedestrian connectivity to the adjoining Public Right of Way at the site's northern boundary, as well as the potential for a new pedestrian and cycle connection to 'Hillside' to the East.

Landscaping

6.22. Any development would incorporate a policy-compliant amount and standard of public open space, likely integrated with sustainable drainage systems and key pedestrian/cycle circulation routes.

6.23. We would anticipate this may also provide additional opportunities for ad-hoc use by the school, notwithstanding their own high-quality grounds, for nature-based learning conducted on an ad-hoc basis, given its convenient location.

6.24. Street tree planting could be incorporated within the development envelope, also to include peripheral hard and soft landscaping to ensure a high standard of public realm.

6.25. As set out above, the site is well contained by adjoining built development, and largely screened from wider views by the elevated Gravity bypass to the South, which effectively severs the site from the wider open land, including woodland, southward of the village.

6.26. Taking into account the site's topography, subject to appropriate standards of planting, soft landscaping and final finishing, it is not anticipated that the development of the site for new housing would give rise to undue adverse visual impacts.

Arboriculture

6.27. The site is bounded by a mature native hedgerow to 'Hillside', mixed trees and hedgerow to the inset boundaries to the school, and a series of sporadic mature trees to 'Puriton Hill'. It is anticipated that these would be surveyed for quality and lifespan in the course of any planning application.

6.28. It is likely that the creation of site access would necessitate the removal of c.2no. trees adjacent to 'Puriton Hill', but there may be some scope to adjust access position and alignment to seek to minimise removal and/or target the retention of higher-quality trees.

6.29. Likewise, a small breakthrough may be created with 'Hillside' to facilitate pedestrian/cycle access (typically 2.5-3m wide).

6.30. This loss would be offset by planting within the site, which is currently open pasture, including the provision of street trees and potential hedgerow planting to define public open space and its transition with more prominent domestic boundaries.

Ecology

6.31. The site is not subject of any known ecological designations or constraints, and would be subject to Phase 1 (walkover) and Phase 2 ecological surveys to inform an eventual planning application.

6.32. It is anticipated that proposals for the land would support biodiversity through reinforced tree and hedgerow networks, bat and bird boxes, hedgehog highways and other open space measures to deliver an on-site gain for ecology.

Drainage

6.33. The site lies within Flood Zone 1, identified as representing the lowest risk of flooding, and currently has no specific infrastructure for the management of surface water runoff from the land.

6.34. The site topography indicates that a managed attenuation feature in the northern part of the site is likely to be feasible, potentially either a permanent or semi-permanent water body allowing for water storage and regulated discharge during inclement weather.

Amenity

6.35. It is considered that the site could be delivered for housing without undue pressure on the residential amenity of existing nearby occupiers, while achieving an appropriate standard within the development itself.

6.36. Initially, it is anticipated that the creation of a landscaped corridor incorporating the existing Public Right of Way at the northern site boundary would ensure an ample setback from properties at Webbers Way/Rowlands Rise, preventing any undue overlooking, overshadowing or overbearing.

6.37. The site is otherwise physically separated from other residential receptors at 'Hillside' and 'Puriton Hill' by planted boundaries and highways, which serve as natural buffers to any amenity pressures.

Interim Summary

6.38. An indicative detail of the site constraints and opportunities as regards the facility to deliver housing development in conjunction with school expansion is shown below.

Figure 5: Constraints and Opportunities

6.39. The site represents a sustainably located, proportionate and suitable parcel for housing development, which if allocated through the Neighbourhood Plan would both provide a sensitive addition to the village with a suitable range of property sizes and types, and serve to increase the robustness of the plan itself.

7. Conclusions

7.1. Pegasus Group have prepared these representations on behalf of our clients, Mr and Mrs Hanham and Coln Residential, who are in control of the land south and west of Puriton Primary School, which have therefore focused on emerging policy LFA3 insofar as it concerns this parcel of land.

7.2. We have engaged proactively with the school, meeting with the headteacher and chair of governors, as well as conducting our own observations on how the school operates around drop-off and pick-up times, and on the characteristics of the wider surrounding area.

7.3. This due diligence, together with the practical considerations of which our clients are acutely aware, have led us to the conclusion that the safeguarded land as currently indicated in Map 9 is impractical for the school's current purposes, and equally undesirable from our clients' perspective.

7.4. We have presented an alternative arrangement illustratively, showing how the same amount of land could be relocated and reconfigured using the available land to the northwest of the school, enabling greater flexibility on final form and overcoming the numerous obstacles presented by the current indicated location to deliver better outcomes overall.

7.5. In respect of the indicated potential uses/projects set out at criteria (i)-(iv) of draft policy LFA3, in dialogue with the school we consider that options (i) (parking/drop-off) and (ii) (open green space) are neither practical nor necessary additions to the school facilities.

7.6. By contrast, we consider options (iii) (multi-use games area) and (iv) (teaching accommodation) to be evidentially beneficial additions to the school's facilities. We would therefore strongly recommend – subject to the agreement of the school and LEA – that the scope of draft policy LFA3 is refined accordingly.

7.7. In order to ensure a feasible delivery vehicle for the additional school land, we would be supportive of the allocation of the remainder of the parcel for residential development of c.70no. dwellings, infrastructure, open space and strategic landscaping. The provision of the school land could then be secured by legal agreement in conjunction with a planning permission.

7.8. This, we consider, will improve the robustness of the emerging Neighbourhood Plan and stand it in better stead as an emerging policy document as it progresses towards independent examination and referendum.

7.9. We would welcome the opportunity to discuss the details of these representations, and any other matters of relevance, face-to-face with the Neighbourhood Plan Group, and likewise will be pleased to answer any questions arising from the current consultation.

Appendix A – Puriton Primary Letter 30.10.22

Puriton Primary School
Rowlands Rise | Puriton
Bridgwater | Somerset | TA7 8BT
01278 683630
office@puritonprimaryschool.org.uk
www.puritonprimaryschool.org.uk

Head of School: Katie Williams
Transitional CEO: Gary Schlick

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30th October 2022

Dear Callum

Thank you to you and your colleagues for meeting with Tessa Miller, Chair of Governors, and me on 19th October. We were pleasantly surprised to be advised that there has been a proposed allocation of safeguarding land for the school. While we are very pleased to learn this, the position of the land is not ideal as set out in the Puriton Neighbourhood Plan (which went out for consultation for six weeks 17 Oct - 28 Nov) as it is some distance from the main school building. When you first mentioned it, I had assumed it would be next to the school and current playground area.

Having looked at the plan, it states the land could be used for one or more of the following uses:

- ***Drop off and turning area to remove traffic congestion at the start and end of the school day.***
- From the point of view of the school this would not be very practical; primary school children are not usually dropped off, parents walk the children into school so this space would end up as car park and many parents would still use Rowlands Rise and other adjoining streets. This would not be of any direct benefit for the children.

- ***Additional green open space***
- While additional green space is always welcome, this would not be a priority for the school.

- ***Provision of a multi-use games area***
- This would be of great interest to the school and be of direct benefit to the children

- ***Additional indoor or covered teaching space***
- This would be valuable, indeed essential, if as a result of the additional housing, the predicted increase in applications for places are the school are to be accommodated.

As discussed, if the land were to be used for classroom accommodation and a MUGA (the preferred options of the school) then the natural place would be to the side of the playground area as mentioned above. This would maximise the opportunities for development and give the greatest benefit to the children.

You asked about Parish Council Meetings; I understand the next one is on Tuesday 8th November. If you would like us to attend or to share our perspective, please do let us know.

Thank you again for your time and we look forward to hearing from you in due course.

Kind regards,

Katie Williams
Head of School

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Bristol
First Floor, South Wing, Equinox North,
Great Park Road, Almondsbury, Bristol, BS32 4QL
T 01454 625945
E Bristol@pegasusgroup.co.uk
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