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Puriton Neighbourhood Plan Group

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Our Ref: DC  
Your Ref:

Dear Sir/Madam,

### **Representations in response to the Draft Puriton Neighbourhood Plan Consultation**

I am writing on behalf of our client, The Knowle Estate, to make representations in relation to the Draft Puriton Neighbourhood Plan (Pre-submission version, published July 2022).

Specifically, we would like to address the proposed designations in relation to the proposed draft Policy BNE5 which relates to the designation of Local Green Spaces (LGS).

### **Local Green Space Designations**

#### **NPPF:**

Paragraph 101-103 of the National Planning Policy Framework (NPPF) sets out the governments requirements for the designation of LGS's:

- 101. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.*
- 102. The Local Green Space designation should only be used where the green space is:  
a) in reasonably close proximity to the community it serves;  
b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and  
c) local in character and is not an extensive tract of land.*
- 103. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.*

As a result of paragraph 103 of the NPPF, Local Green Spaces (LGS) effectively have the same status as Green Belt, the purpose of which is to prevent urban sprawl on the edge of and between settlements by preserving its openness. The range of development that is permitted with Green Belts is exceptionally limited.



**PPG:**

Planning Practice Guidance (PPG) is an online resource which provided further information on how the NPPF should be applied.

Paragraph 013 of the PGG on 'Open space, sports and recreation facilities, public rights of way and local green space' (Reference ID: 37-013-20140306) indicates that the designation of land as LGS is 'a matter for local discretion' and goes on to provide examples of the types of spaces the policy is intended such as green areas where "sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis".

Paragraph 014 (Reference ID: 37-014-20140306) of the same PPG goes on to say that LGS's must be 'reasonably close' to the community it serves. For example, where public access is key to its special value, then the site would normally be within easy walking distance.

Paragraph 017 (Reference ID: 37-017-20140306) indicates that land could be considered for designation even if there is no public access.

These requirements therefore form the basis for the comments below.

**Response to Draft LGS Designations & Policy**

**Approach and methodology of LGS designations:**

Map 23 of the Draft Puriton Neighbourhood Plan indicates the Location of proposed Local Green Spaces and Table 1 sets out the reasons for designation for each site.

There are 13 proposed LGS's in total. It is noted that a number of these (5 in total) are also identified in the Local Plan as either 'Formal Outdoor Space' (such as the children's Play Park) or 'Informal Outdoor Space' (including the Orchard and Allotments). The merits of which are innately obvious in regards to their value to the community for leisure, wellbeing and recreation. Our client's land does not relate to any of these sites.

In regards to the other sites listed, locations where village events and sporting activities are held, the village green and one location where unspoilt rural views can be enjoyed, all appear to be reasonable candidates for LGS designation. There is however a remaining few that do not appear to be well justified. This includes the Puriton Woods and Chisland Covert, which are both in the ownership of our client. The following provides a detailed response on both of these sites.

**Puriton Wood (New Ground Covert) (LGS Site 12):**

The Puriton Woods site is located north of the A39 (Puriton Hill) and south of the new Enterprise Way (which is not shown on Map 23). The reason given for its inclusion as a LGS designation is that it is 'woodland important for biodiversity' and that 'paths which run through the area are well-used'.

Paragraph 013 of the PPG indicates the types of spaces that the LGS designation is intended. In general these are spaces are focal points for enabling community cohesion and facilitating outdoor activities; in short these green spaces are at the heart of community life. The following highlights how the proposed LGS designations of the identified woodland areas do not fulfil the intended aims of this planning tool.

It should firstly be noted that the site in question is private property and is not expressly open to public use. There is however a PRoW along the southern boundary of the site (Ref. BW/28/1/1), for a distance of approx. 300m, as indicated in the extract in Figure 1 below.

It is claimed that the PRoW is 'well-used'. Whilst we have no reason to specifically dispute this claim, it should be recognised that the path past the site is not wide or surfaced for much of its length and therefore not easily accessible by all members of the public and local community.

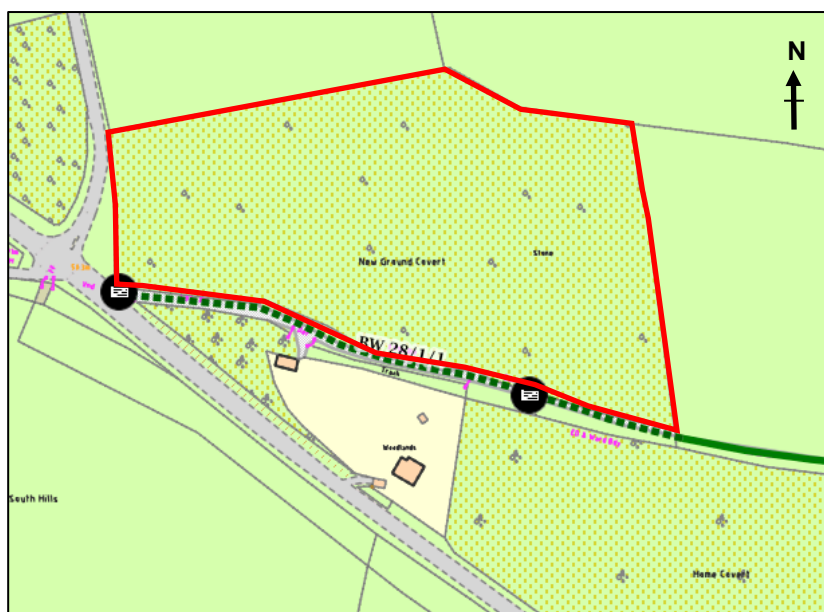
It has been identified that these woods are currently under threat by Ash Die-Back and it could be dangerous to walk away from the alignment of the public bridleway area, which receives annual tree health safety checks.

Woodland management will be necessary and new trees will need protection if the woods are to survive in the longer term. The landowner is currently taking the necessary steps to ensure the correct care is given to protect the woods.

Whilst it is acknowledged that the land does not need to be publically accessible to qualify for LGS status, the implied 'special qualities' of the site are internal to the wooded area only, which is not generally publically accessible. Nor is it clear why this area of woodland is deemed more important than its nearby parcels, which are also wooded (and similar in character) and presumably utilised freely by the fauna within.

The NPPF indicates that 'richness of wildlife' can be a reason for LGS designation; this suggests that the location should be plentiful in number and variety. Whilst woodland can in general principles accommodate a range of wildlife, the opportunities for certain species will vary from woodland to woodland and the specific characteristics a specific area might exhibit. Whilst there is no doubt some degree of wildlife within this patch of woodland, which may or may not be glimpsed when passing, no evidence has been made readily available which demonstrates a particular abundance of wildlife and/ or plant species in this location nor that there is specific knowledge that New Ground Covert accommodates particular exceptional or rare species. The public database shows no records for this location or the adjacent woodland (either professional surveys or otherwise). In fact, recent assessments in connection with preparing a management plan for the site indicates the contrary; that there is currently a more limited variety of tree species in this particular location, which isn't generally favourable to a rich abundance of biodiversity. In summary therefore, it is not evident that biodiversity in this location is especially abundant or easily accessed (without trespassing) and that recent inspections found that the current conditions are not especially favourable to enable a rich biodiverse environment.

Furthermore, the development potential for this site is likely to be relatively limited and small in scale. The landowner is currently in fact undertaking work to maintain the woodland. Existing local and national planning policy and legislation already contains the required environmental and spatial policies to prevent extensive or inappropriate development in such a location. Additional protection from development is therefore not necessary and the proposed LGS designation is unnecessarily over-onerous.



**Figure 1:** Extract of PRow's in immediate vicinity to the proposed Puriton woods LGS designation (outlined in red).

**Chisland Covert (LGS Site 13):**

The Chisland Covert site is a patch of woodland which is some way from the village (approx. 475m at the closest points and approx. 1km on foot from the edge of the village). The site is relatively isolated, situated away from roads and surrounded by agricultural fields. The reason given for its inclusion as a LGS designation

is again that it is ‘woodland important for biodiversity’ and that the ‘paths which run through the area are well-used’.

Like the Puriton Woods site, this site is again passed along its southern boundary for approx. 190m by a PRow (ref. BW/28/1), please see extract in Figure 2 below. This PRow links Puriton with Woolavington. The land is private property and users of the PRow should not stray off the path.

In addition to the above comments given in regards to Puriton Woods (and which equally apply here), the criteria for designation also requires that any LGS is in ‘reasonably close proximity to the community it serves’. Whilst the 1km walking distance from the village is seemingly walkable, the site itself is unlikely to be the intended ‘destination’ and walkers are more likely to be passing the site on their way to Woolavington, a walk of approx. 3km (6km for a round trip). Any implied enjoyment of the site is therefore incidental and experience briefly when immediately passing the site.

Significant development opportunities in this location are likely to be even more limited. It is therefore not necessary to designate the site for a level of protection which is consistent with Green Belts. Existing local and national planning policy and legislation already contains the required environmental and spatial policies to prevent extensive or inappropriate development in such a location and is generally regulated through the planning management process. The LGS is intended to be enduring and such a designation could be counter-productive to the effective management and enhancement of the site and/or future enjoyment of the site in the longer term.



*Figure 2: Extract of PRow's in immediate vicinity of proposed Chisland Covert LGS designation (outlined in red).*

## **Conclusions**

In summary, two of the proposed LGS's indicated in the Draft Neighbourhood Plan fall within our client's ownership. Upon consideration, there is limited public access to the sites, being limited to the PRow, and recent inspections (in relation to Ash Die-Back) have reported that the sites are currently do not present characteristics which would result in rich biodiversity. Development opportunities for both sites is likely to be limited and small in scale, and the proposed designation is not necessary, being covered adequately by either controls, and would be overly-onerous in preventing development. Furthermore, the designation of both of these sites as a LGS does not align with the intended purposes of this particular planning tool.



We respectfully request that these comments are considered when reviewing the draft Neighbourhood Plan and appropriate amendments are made accordingly. Should any further clarification on the points set out in this letter be required, please do feel free to contact me on the details given at the top of this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to be "D. Collier", written in a cursive style.

**Donna Collier** MPlan MRTPI  
Associate  
Planning