

Our Ref: DfE/NDP/FS1007

28 February 2023

Dear Perranzabuloe Parish Council,

Re: Perranzabuloe NDP Pre-submission (Regulation 14) Supplementary Consultation

Further Submission of the Department for Education (DfE)

1. We welcome a further opportunity to contribute to planning policy at the neighbourhood level, following the submission of representations on 10 June 2022. This representation should be read in conjunction with that first submission.

New Secondary School Site

2. We welcome the proposed changes to the draft NDP that would aid the delivery of a secondary school. The revisions to the settlement gap, in particular, broadly align with the initial feasibility work to determine the optimal location of the new school buildings, whilst balancing a number of other planning policy requirements. We also welcome the introduction of a new policy specifically directed at the proposed school development.
3. Although these alterations and additions to the NDP are supported in principle, we have the following comments to make, which we request are taken into consideration as the NDP moves towards finalisation and adoption.

Settlement Gap

4. The proposed alterations to the NDP suggest splitting the school site (see Annex A) into two areas, known as 'Area A' and 'Area B'. New development, including all buildings and hardstanding, is directed towards the former, with no development other than playing fields allowed within Area B.
5. Although we support directing development to Area A, setting the areas and associated policy with such an absolute boundary will restrict flexibility during the design process. This could have unintended consequences on other policy requirements, including proposed policy LWE4, and the ability to meet educational needs of pupils. This could, for example, include highways requirements (with sufficiently sized parking / turning areas), visual impact (by not being able to limit impact on key views) or sporting needs (via compromised playing pitch layouts).
6. We therefore suggest that an 'encroachment zone', or degree of flexibility introduced into the policy, which allows for marginal encroachment into Area B, when it would be required to meet other policy or educational requirements.

7. Introducing such flexibility would allow the proposal to meet the requirement of the NPD, provided the relevant evidence is provided to support any encroachment into Area B. As it stands, the policy and Map 19 do not allow for any flexibility if the edge of the school building or hard play areas crossed the boundary.

Policy LWE4: New Secondary School, Perranporth

8. In addition to the comments above, which have an impact on the proposed wording of new proposed policy LWE4, we also have the following observations:
 - The use of the phrase 'very special circumstances' is not considered appropriate. This is connected with Green Belt land. This sentence should be deleted, as the circumstances under which a school development would be accepted are clearly set out in the following parts of the policy.
 - Point iv) is amended to reflect flexibility suggested between Areas A and B.
 - Reconsider the need for a further school entrance on the Bolingey side of the site, due to the need to create a secure boundary to the school. Typically, school sites are designed with one secure entrance. A secondary entrance would also necessitate additional hardstanding and lighting to allow for a safe and secure path across/around the playing fields.
 - Note that whilst the community use is supported, limitations on or lack of floodlighting would limit access to outdoor pitches through the winter.

Site Boundary

9. The boundary of the school site is based on an incorrect plan, which was drawn up before land registry due diligence had been completed. The correct boundary is attached at Annex A. We request that the relevant plan(s) included in the NDP are based on this boundary. The main alteration concerns the field area immediately adjacent to the property on Bolingey Road known as 'Black Adder'.

Conclusion

10. I hope the above comments are helpful in finalising the Pre-submission draft NDP, with specific regard to the provision of a secondary school in the Parish. Further discussions as to how the NDP can accommodate the project whilst maintaining other requirements relating to the settlement gap and key views are welcomed.
11. Please contact me if you have any queries regarding this response. The DfE looks forward to working with all parties to aid in the preparation of the NDP.

Yours faithfully,

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Annex A – Site Location Plan

