



# Blundell's

FOUNDED 1604

12th February 2026

Dear Sir or Madam,

## **Re: Planning Application 25/00961/MFUL | Objection from Blundell's School**

### **Introduction**

I write on behalf of Blundell's School to formally object to the above planning application.

This objection reflects the views of the senior executive and leadership teams, the Governing Body, the parents and the pupils. It is submitted in the School's capacity as an educational establishment responsible for the safety, wellbeing, and learning environment of children and young people, and is separate from representations made by individual governors or members of the local community.

This objection is evidence-based and draws on material submitted to the Planning Portal, including correspondence from local residents, the Applicant's Formal Planning Statement and the Local Highway Authority (LHA) consultation response dated 28th January 2026.

### **1. School Environment, Safeguarding, and Functional Use of the Highway**

The proposed access route passes directly through the Blundell's campus and its immediate surroundings.

Routes passing through and adjacent to Blundell's School are not merely transport corridors. They form an integral part of the School's operational campus and are used continuously throughout the day by children moving between classrooms, boarding houses, dining facilities, sports facilities, and other school activities. This functional reality has historically required traffic-calming measures and the School considers that this level of pedestrian activity materially heightens the safeguarding risk, and warrants further careful consideration.

It is noted that representations submitted by local residents indicate that pupil road crossings at Blundell's occur at a scale of approximately 3,000 per day; these are not solely during peak drop-off and collection periods and are constant. Noting this data, it is

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misleading to treat these roads as generic rural highways; this materially understates the safeguarding risk.

## **2. Duty of Care and Safeguarding Responsibilities**

Blundell's School has a non-delegable duty of care to the children in its charge. It is the School's

firm belief that risk where children's safety is concerned must always be assessed conservatively and against the highest standards, especially when pupils are required to cross and interact with public highways as part of daily school life. The application fails to do this and, instead, relies on assumptions, averages and post-approval management plans.

## **3. Noise, Vibration, and Impact on the Learning and Living Environment**

The impact of quality of the application on the learning and living environment at Blundell's is of significant concern. The noise, vibration, and disturbance arising from the application and the associated large agricultural vehicle movements are not abstract amenity issues, as suggested, but threaten to directly affect pupils' concentration, wellbeing, health and educational outcomes. Further, we highlight that boarding houses - which are pupils' homes - are located in close proximity to Blundell's Road and are exposed to traffic disturbance from the early morning through to late evening, potentially for 18–20 hours' daily. This application threatens to aggravate this impact materially. However, these impacts have neither been properly assessed nor mitigated within the application, and only evaluated by reference to short peak periods.

## **4. Inadequate and Unverifiable Traffic Evidence**

The planning application asserts that the slurry lagoon would not result in a material increase in traffic. That assertion is not supported by transparent or verifiable evidence.

The Planning Statement identifies weekday tanker movements of 13–21 two-way trips (26–42 vehicle movements) yet provides no audited baseline of existing agricultural traffic against which any increase can be assessed. In parallel, calculations submitted by local residents indicate that, depending on operational use, the lagoon could facilitate up to 9,120 tanker round trips per year, equivalent to 70–118 tractor movements per day .

The proposed reliance on a planning condition restricting lagoon use to slurry generated by Bycott Farm does not address this evidential deficiency either. No mechanism is proposed to monitor slurry volumes, vehicle movements, nor offers a solution for long-term compliance. In the absence of baseline data and enforceable monitoring, the conclusion that traffic impacts would not be material is unsupported.

## **5. Highway Safety Conclusions Reached Without Essential Speed Evidence**

The Local Highway Authority acknowledges that observed vehicle speeds on Newte's Hill are approximately 45 mph, yet confirms that no formal speed survey has been undertaken.

The proposal relies on 90m visibility splays at the Gogwell Lane / Newte's Hill junction. However, where actual vehicle speeds may exceed assumed design speeds, the adequacy of such mitigation cannot be verified without empirical data.

Blundell's School does not seek to substitute its own technical assessment for that of the Highway Authority. However, in a location subject to mixed traffic and vulnerable users, it is a matter of concern that safety conclusions have been reached in the absence of measured speed evidence.

The absence of empirical data introduces uncertainty into the highway safety assessment, which is particularly significant when considered alongside the safeguarding context set out above.

## **6. Cumulative Growth in Traffic Movements and Strategic Context**

The School has experienced a significant increase in transport movements through and around the campus over the past five years.

Individual developments may appear manageable in isolation, but their cumulative effect has materially altered traffic conditions, noise levels, and safety risk over time. This pattern of incremental harm is directly relevant to the assessment of the current application and should be afforded significant weight.

In addition, the proposal appears to conflict with the strategic objectives of the Tiverton Eastern Urban Extension, which sought to reduce transport volumes to the east of Tiverton rather than introduce additional movements through sensitive locations such as Blundell's School.

## **7. Impacts on the Blundell's Conservation Area**

The School is concerned about the effect of increased heavy vehicle movements on the Blundell's Conservation Area, which forms an integral part of the School's historic setting and character.

The application does not adequately address the effect of noise, vibration, visual intrusion, and erosion of character arising from intensified agricultural traffic within this designated area.

## 8. Inappropriate Reliance on Planning Conditions

The Application relies heavily on future planning conditions, including a use restriction, Traffic Management Plan and Construction Management Plan, to mitigate impacts that have not been properly quantified.

Planning conditions cannot remedy the absence of baseline traffic data, speed survey evidence, cumulative impact assessment, or a school-specific highway safety evaluation. Where the evidence base itself is deficient, reliance on conditions is not an appropriate substitute.

## 9. National Planning Policy Framework (NPPF) | Highway Safety Test

Paragraph 116 of the National Planning Policy Framework (December 2023) states:

*"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*

Blundell's Road, including the Blundell's School campus, the Horsdon roundabout and its approaches, forms a key part of a principal access route into and from Tiverton and the surrounding area. It is not a minor rural lane but a heavily used route serving residential areas, pedestrians, cyclists, school traffic and wider town movements.

The introduction of slow-moving, over-wide tractors and slurry tankers along this route would materially impede traffic flow and significantly increase risk to non-motorised users, including pupils walking to school and those required to cross Blundell's Road continuously throughout the school day.

For the reasons set out in this objection, including the absence of baseline traffic data, absence of a formal speed survey, cumulative traffic growth, safeguarding risk and extended daily disturbance, the School considers that the impacts of the proposal would be **severe** within the meaning of paragraph 116 of the NPPF.

It is our position that such impacts cannot be either adequately or safely mitigated by planning conditions, particularly where routing cannot be physically enforced or effectively policed.

## Conclusion

We feel that the Application fails to demonstrate that the proposal would not result in unacceptable highway safety impacts, or severe residual cumulative effects, particularly in the context of Blundell's School and other vulnerable road users.

The School is aware of the significant public concern surrounding this application, including concerns expressed by many parents regarding children's safety and the learning environment. We strongly believe that those concerns are well founded, and are reflected in this objection.

In our experience, once traffic levels and associated disturbance exceed certain thresholds, the resulting impacts on safety, wellbeing, and educational quality are difficult to reverse.

For the reasons set out above, we believe that planning permission should be refused.

At minimum, the application should be deferred pending the submission of a full Transport Assessment supported by measured speed data, cumulative impact analysis, and a school-specific highway safety assessment.

Whilst Blundell's School has felt compelled to object to this application, please note that it will separately be seeking a meeting with our County Councillors and Senior Leaders at Devon County Council. This will allow us to convey the scale of impacts with the primary objective to understand how we can work in partnership to negate the traffic impact on the educational offering and the safety of our pupils and school team.

Yours faithfully,



Bart Wielenga

The Head

Submitted for, and on behalf of, Blundell's School