

GLOUCESTER CITY COUNCIL

COMMITTEE : **PLANNING**

DATE : **5TH DECEMBER 2017**

ADDRESS/LOCATION : **LAND AT CLEARWATER DRIVE,
QUEDGELEY**

APPLICATION NO. & WARD : **17/00729/FUL
SEVERNVALE**

EXPIRY DATE : **24TH OCTOBER 2017**

APPLICANT : **EDUCATION AND SKILLS FUNDING
AGENCY**

PROPOSAL : **ERECTION OF A PRIMARY SCHOOL AND
ASSOCIATED INFRASTRUCTURE WITH
CAR PARK AND PEDESTRIAN AND
VEHICULAR ACCESS FROM CLEARWATER
DRIVE AND PEDESTRIAN ACCESS TO
ELDERSFIELD CLOSE**

REPORT BY : **JOANN MENEAUD**

NO. OF APPENDICES/ : **1.SITE LOCATION PLAN
2.ELEVATIONS
3. LANDSCAPE MASTERPLAN
4.LETTER FROM DIOCESE OF
GLOUCESTER ACADEMIES TRUST
5.LETTER FROM EDUCATION AND SKILLS
FUNDING AGENCY
6. LETTER FROM MCLOUGHLIN PLANNING
7. FULL CONSULTATION RESPONSE FROM
HIGHWAY AUTHORITY**

1.0 SITE DESCRIPTION AND PROPOSAL

- 1.1 The site comprises 2.17 hectares and is located to the north of Clearwater Drive and adjoins the City Council adopted open space encompassing the Canal walk to the north. The site is open and undeveloped and is used as open space. The site is overgrown in places and there are paths running across the site. The land is within the ownership of Gloucestershire County Council. The boundaries of the site adjoin residential properties in Clearwater Drive, Brockridge Close, Aspen Drive, Eldersfield Close and Hasfield Close and the City Council's adopted open space.

- 1.2 The application proposes a two form entry primary school for 420 pupils and a 42 place nursery school. A new vehicular access is proposed from Clearwater Drive serving a car park for staff and parents, together with a designated vehicle parent drop off and collection area. Two separate pedestrian accesses are proposed either side of the vehicular access from Clearwater Drive, together with a maintenance only access from Aspen Drive and a pedestrian access from Eldersfield Close.
- 1.3 The school building is proposed to the rear of the car park. This is designed as a two storey building of 2,243sqm. To the eastern side of the site a multi use games area (muga) and grass pitch are proposed with a hard play area immediately behind the school building. A further smaller hard play area is proposed adjacent to the nursery element, with the land further north and west to be used as soft informal play, a habitat area and a forest school area.
- 1.4 The application is to provide a permanent site for Clearwater Church of England Primary Academy which is currently based, in temporary accommodation at Hardwicke Parochial Primary School located at Poplar Way in Hardwicke. This new school opened in September 2017 with 30 pupils.

2.0 RELEVANT PLANNING HISTORY

- 2.1 The site forms part of an application for residential development granted consent in 1981 when the site was within the jurisdiction of Stroud District Council. Adjoining houses were built in the early 1990's. Further details of the planning history of the site are considered at section 6.

3.0 PLANNING POLICIES

- 3.1 The following planning guidance and policies are relevant to the consideration of this application:

Statutory Development Plan

The statutory Development Plan for Gloucester remains the partially saved 1983 City of Gloucester Local Plan ("1983 Local Plan"). However this plan does not include the area of Quedgeley which was under the jurisdiction of Stroud District Council, at that time.

- 3.2 Paragraph 215 of the National Planning Policy Framework ("NPPF") states that *'...due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given.'*
- 3.3 The 1983 Local Plan is more than thirty years old and, according to the Inspector who dealt with an appeal relating to the Peel Centre, St. Ann Way (13/00559/FUL), *'...its sheer ages suggests it must be out of date...'* (par. 11

of the Inspector's report). Members are advised that the 1983 Local Plan is out-of-date and superseded by later planning policy including the NPPF.

- 3.4 Central Government Guidance - National Planning Policy Framework (NPPF)
This is the latest Government statement of planning policy and is a material consideration that should be given significant weight in determining this application.

Decision-making

The NPPF does not alter the requirement for applications to be determined in accordance with the development plan unless material considerations indicate otherwise. In assessing and determining applications, Authorities should apply the presumption in favour of sustainable development. For decision-making, this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent, or relevant policies are out of date, granting planning permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole; or
 - specific policies in the NPPF indicate development should be restricted.

Authorities should look for solutions rather than problems and decision-takers should seek to approve applications for sustainable development where possible (paragraph 14).

Core planning principles (paragraph 17)

Planning should:

- Be genuinely plan-led;
- Be a creative exercise in ways to enhance and improve places;
- Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;
- Secure high quality design and a good standard of amenity;
- Take account of the different roles and character of different areas;
- Support the transition to a low carbon future, take account of flood risk and encourage the use of renewable resources;
- Contribute to conserving and enhancing the natural environment and reducing pollution;
- Encourage the effective use of land by reusing brownfield land;
- Promote mixed use developments;
- Conserve heritage assets in a manner appropriate to their significance;
- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable;

- Take account of and support local strategies to improve health, social and cultural wellbeing and deliver sufficient community and cultural facilities and services to meet local needs.

The NPPF includes relevant policy on;

- Ensuring a sufficient choice of school places
- Promoting sustainable transport, including the statement that development should only be prevented on transport grounds whether the residual cumulative impacts of development are severe
- Requiring good design and promoting healthy communities
- Meeting the challenge of climate change, flooding and coastal change, conserving and enhancing the natural environment, conserving and enhancing the historic environment

The National Planning Practice Guidance has also been published to accompany and to expand on the National Planning Policy Framework.

Emerging Development Plan

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Adoption Version 2017

3.5 The City Council is currently working on a new Development Plan that will comprise the Joint Core Strategy for Gloucester, Cheltenham and Tewkesbury ("JCS") and Gloucester City Plan ("City Plan") once they are adopted. On adoption, the JCS and the City Plan will provide a revised planning policy framework for the Council. In the interim period, in accordance with paragraph 216 of the NPPF, weight can be attached to relevant policies in the emerging plans according to:

- The stage of preparation of the emerging plan
- The extent to which there are unresolved objections to relevant policies; and
- The degree of consistency of the relevant policies in the emerging plan to the policies in the National Planning Policy Framework

The JCS Inspector's report was received in October 2017 and concluded that, subject to the main modifications and an immediate partial review, the JCS is sound and legally compliant. Therefore, in accordance with paragraph 216 of the NPPF, it is considered that the JCS policies can be given very significant weight.

3.6 Relevant policies from the JCS include:
 SP1 - The need for new development
 SP2 – Distribution of new development
 SD3 – Sustainable design and construction
 SD4 – Design requirements
 SD6 – Landscape
 SD8 – Historic Environment
 SD9 – Biodiversity and geodiversity
 SD14 – Health and environmental quality
 INF1 –Transport network

- INF2 – Flood risk management
- INF3 – Green Infrastructure
- INF4 – Social and community Infrastructure
- INF5 – Renewable energy
- INF6 – Infrastructure Delivery

Gloucester City Plan

The Gloucester City Plan (“City Plan”) is at a less advanced stage than the JCS. The City Plan will deliver the JCS at the local level and provide policies addressing local issues and opportunities in the City. The Draft Gloucester City Plan 2017 takes forward the results of previous consultations and was subject to consultation January and February 2017. The Plan is at an early stage and therefore carries limited weight

The application is subject to a site specific allocation SA14 for the following options

- 2 Form Entry Free School.
- Or 15-30 dwellings plus enhanced public open space provision.
- Large children’s play area.

- 3.7 On adoption, the Joint Core Strategy and the City Plan will provide a revised planning policy framework for the Council.

Gloucester Local Plan, Second Stage Deposit 2002

- 3.8 Regard is also had to the 2002 Revised Deposit Draft Local Plan. This has been subjected to two comprehensive periods of public and stakeholder consultation and adopted by the Council for development control purposes. This cannot be saved as it is not a formally adopted plan, however with it being adopted for development control purposes it is still judged to be a material consideration, albeit of limited weight.

2002 Plan policies

- 3.9 Members are advised that the following “day-to-day” development management policies, which are not of a strategic nature and broadly accord with the policies contained in the NPPF, should be given some weight:

- FRP.1a – Flood risk
- FRP.6 – Surface water run-off
- FRP.8 – Renewable energy
- FRP.9 – Light Pollution
- FRP.10 – Noise
- FRP.11 – Pollution
- FRP.15 – Contaminated land
- BE.1 – Scale, massing and height
- BE.4 – Criteria for the layout, circulation and landscape of new development
- BE.5 – Community safety
- BE.6 – Access for all
- BE.7 – Architectural design
- BE.8 – Energy efficient development
- BE.12 – Landscape schemes

BE.13 – Landscape strategy
 BE.14 – Native species
 BE.21 – Safeguarding of amenity
 BE.31 – Preserving sites of archaeological interest
 BE.32 – Archaeological assessment
 BE.33 – Archaeological field evaluation
 BE.34 – Presumption in favour of preserving archaeology
 TR.1 – Travel plans and planning applications
 TR.2 - Travel plans – planning obligations
 TR.9 – Parking standards
 TR.11 – Provision of parking for people with disabilities
 TR.12 – Cycle parking standards
 TR.30 – School safety zone
 TR.31 – Road safety
 TR.33 – Providing for cyclists/pedestrians
 TR.34 – Cyclist safety
 SR.2 – Playing fields and recreational open space
 SR.3 – Intensive use facilities and floodlighting
 CS.2 – Provision of new community facilities
 BS.2 – Sites of nature conservation interest (a and b) and key wildlife sites
 BS.3 – Sites of nature conservation interest (c and d)
 B7 – Protected Species
 B.10 – Trees and hedgerows on development sites
 ST.3 – Protecting Valued Open Spaces
 ST.7 – Urban Design Principles

The site has specific allocations covered by policy CS9 and OS.7

Policy CS9 - Land Reserved for Primary Schools

Sites at The Wheatridge and Clearwater Drive are reserved for new primary schools.

The explanatory paragraph to policy CS9 states:

The County Council has two sites in the city reserved for future use as primary schools and these are identified on the Proposal Map. Should the site at Clearwater Drive not be needed for a school it could provide useful additional public open space in an area where there is a considerable shortfall, and this is reflected in an allocation for this purpose under Policy OS.7.

Policy OS.7 New Areas of Public Open Space

The following sites are allocated for public open space as shown on the proposals map:

Site 3 – Clearwater Drive

The explanatory paragraph to policy OS 7 states:

A further opportunity to address the deficit of Public Open Space at Quedgeley may arise at Clearwater Drive. The land reserved here for a primary school may not be needed for this purpose and the site now has significant nature conservation value. If the site is no longer needed for a school then it could make a useful contribution to public open space in this area.

Therefore this site is allocated for new public open space alongside its reservation for education use.

Draft Clearwater Drive Supplementary Planning Document

In 2008/9 the Council produced a draft supplementary planning document (SPD) for the wider site, including all the land now within both the City and County and Council ownership. The brief was intended to guide new development proposals for the site as the County Council had resolved that the site was no longer required for education purposes. The Brief proposed residential development on a small part of the site, approximately 1 hectare, with the remaining land to be used as public open space.

Although it was subject to considerable consultation, the SPD was not formally agreed or adopted, therefore it carries limited weight.

All policies can be viewed at the relevant website address:- Gloucester Local Plan policies – www.gloucester.gov.uk/planning; and Department of Community and Local Government planning policies - www.communities.gov.uk/planningandbuilding/planning/.

CONSULTATIONS

4.1 Highway Authority

The Highway Authority raise no objection to the application but would require a number of conditions to be applied to any planning permission. Their comments are summarised in the report and a full copy of their comments are attached as an appendix.

4.2 Lead Local Flood Authority (LLFA)

The site is within the Environment Agency's Flood Zone 1 although the north west area of the site, behind the existing bund is subject to surface water flooding. The applicant proposes to discharge the surface water from the development through the existing bund and into the wetland behind.

Surface water naturally will flow to this area and this strategy will ensure the existing wetland receives water to remain an effective habitat. The additional surface runoff from the sports field will also flow to this area. Surface water will be attenuated in geocellular underground storage sufficient, together with the proposal to utilise permeable paving in the car parking area for the 1 in 100 year storm (including 40% increase for climate change).

The LLFA has no objection to this application but recommends conditions

4.3 **City Council Drainage Advisor**

No objection subject to the inclusion of conditions.

4.4 **Worcestershire Regulatory Services (Contaminated Land advisors)**

No objection but recommend conditions requiring further site investigation prior to the commencement of development and the application of standard land contamination conditions.

4.5 **Environment Agency**

Identify that the site is located on a historic landfill comprising building rubble and also is located on a Secondary Undifferentiated Aquifer. Recommend applying standard conditions.

4.6 **City Archaeologist**

No comments: The archaeological evaluation (trial trenching) has identified nothing of significance and the proposed development is unlikely to damage or destroy significant archaeological remains.

4.7 **Canal and River Trust**

No comment.

4.8 **Quedgeley Town Council**

The proposed development is beyond the scope of that envisaged when the site was originally set aside and the current proposals are an overdevelopment of the site. It will be detrimental of the quality of life of nearby residents and the character of the area, particularly the character of a two storey nature of the proposed development that would overlook nearby properties with the potential for loss of privacy.

- Disruption would not be limited to school hours as it would be expected that the playing fields would be used outside school hours/term.

- When compared with the 'Clearwater Drive Interim SPD' November 2008 it extends beyond the scope of the area for potential development and infringes both the wetland and attenuation areas as well as infringing the area where it is proposed that the view would be maintained.

- Heavily built up area with deficit of Open Spaces as noted in 'Gloucester Open Space Strategy 2014-2019' with residents reaping significant benefit from access to Clearwater Drive.

- The Transport Assessment provides comparison against dissimilar school environments and that Fieldcourt schools would be a better comparison and signpost the potential for congestion/parking issues; at least one school used for comparison has a large supermarket car park nearby that may mask the potential parking issue. Ongoing parking problems readily evident at local schools does not support the suggestion that most pupils would walk to school especially in the case of the nursery and younger terms when parents driving would not be expected to simply drop off their children in the car park.

- Not all roads in the area have pavements therefore there is significant risk in using these routes for pedestrian access. Access arrangements appear

to remove existing parking arrangements again to the detriment of established residential properties. Should parents drop off at the pedestrian access point in Aspen Drive there would be potentially significant impact on residents' ability to access or egress their properties. A repeat traffic survey conducted on a rainy winter day might have a significantly different result to the one that was conducted in June. While the Transport Assessment goes into detail in some areas there are significant gaps and incomplete in a number of areas. A proposed traffic management plan should be developed that includes the site's accessibility to construction traffic, delivery vehicles and coaches and their potential impact on local infrastructure should be considered.

- Suggested that nursery/primary school places better placed at the point of need nearer to new build housing rather than in established residential areas in order to alleviate the potential for parking issues and the resultant adverse impact on the environment caused by this ecologically less sound proposal for a school of this scale.
- Has research been conducted to ascertain whether any perceived need for additional primary school places as enduring or a temporary 'blip' that could be better managed by the expansion of existing schools and whether the proposal took into account the proposed school at Hunts Grove? It is suggested that the viability of existing schools could be impacted by the moving of even a few pupils to this proposed school.
- The extent of the former fuel storage and pipeline in that area should be investigated and if necessary a decontamination and remediation plan developed.
- Existing areas of run off and drainage from adjacent roads should be safeguarded.
- The Department of Education provides guidelines for outdoor play areas per pupil but this application fails to take these into consideration and the current proposal is below the recommendations.

Taking the above points into consideration it was resolved to object to the application as it is contrary to numerous planning policies within the Gloucester City Council Local Plan namely BE20, BE21, TR.3 and FRP.1a and within the NPPF 'Core Planning Principles' policy 17. 'Promoting Sustaining Transport' policies 32, 34 & 37. Item 7 of NPPF requires 'Good Quality Design' and this application fails to meet these objectives.

The following issues have been raised within residents' comments and are supported by QTC's objection to this proposal:

- Potential for flooding through loss of run off area that has alleviated risk to nearby properties
- Adverse environmental impact
- Increased noise
- Increased congestion and parking problems
- Loss of open space including trees and associated wildlife
- Need for another school in this area is questioned
- Potential devaluation of local properties
- Invasion of privacy
- Impact on residents' views

4.9 **City Waste Management**

No comment but would expect collections to avoid school start and finish times.

- 4.10 **City Council Tree Officer** The proposal will result in the loss of approximately 40 trees. The vast majority are small, self-set hawthorn trees of low/moderate amenity value. None of the trees would be worthy of a TPO, but being native trees, they do have conservation/wildlife value. Recommends suitable compensatory new tree planting.

Observations regarding the proposed planting strategy (doc ref P17-0437-06D) and landscape masterplan (doc ref P17 – 0437-04D).

1. The proposed landscape buffer between the school and properties on Hasfield close is essentially a native hedge with small field maples and crab apples planted to be grown as trees within the hedge. This will provide a limited buffer. Recommend extra heavy standard trees planted between the buffer and the school site, refer to my attached plan.
2. The proposed school ground trees are all trees that will ultimately be small/medium size. Recommend more ultimate large size, planted in appropriate locations. Perhaps a mix of faster growing trees for the short term, such as white poplar and silver birch as well slower growing ones for the longer term such as English oak.
3. The proposed school ground trees include ornamental apples and pears, queries whether it would it be possible to used more local varieties of apples and pears, and perhaps plant them as a separate school orchard area.
4. Unclear whether there will be extra new planting in the proposed forest school area.

4.10 **Gloucestershire Wildlife Trust**

No response at the time of writing the report.

4.11 **City Centre Improvement Officer (Environmental Protection)**

Originally commented that he had no concern with the findings of the submitted noise assessment subject to restrictions on floodlighting and the imposition of conditions. However following further consideration has raised concerns with the scenarios tested and the detail and level of information provided and specifically:

- The report has only assessed limited sporting activities with limited number of children, particularly considering class sizes of 30 children.
- There is no assessment of the use of the muga or playing pitch outside of formal sports lessons, such as lunchtime and break time.
- There is no assessment of spectator generated noise

- The report suggest that the events assessed are worst case scenario but this does not seem actually be the case given the above points.
- It is also considered that the data relating to noise from vehicles travelling to and from the school along Clearwater Drive and vehicles using the proposed car park is not complete and does not show the noise contours in sufficient detail.

5.0 PUBLICITY AND REPRESENTATIONS

5.1 Neighbouring properties were notified by individual letter, a press notice was published and site notices were displayed.

5.2 Over 260 representations of objection have been received raising the following issues:

Open space

- Open spaces should be protected
- The area is very well used by local residents for recreation and very important for community life
- The loss of the open space will have a big impact on local residents
- We should be developing brownfield sites not green sites like this
- If you compare Severnvale area to Kingsway you see that Kingsway has so much more open space- we should not be losing our limited space.
- The Gloucester Open Space Strategy says that Severnvale ward has a significant shortfall of open space – this land should not be built upon

Highways

- The Causeway and Clearwater Drive exit junctions get congested at peak times – driving across Quedgely is already difficult.
- There will be congestion along Clearwater Drive and other roads.
- There are no road improvements proposed.
- Query whether parking restrictions on local roads will be required
- There are no pavements in Eldersfield close which is dangerous for any pedestrians Question the need for a pedestrian access onto Aspen Drive and Eldersfield Close – parents will park here to drop off and collect pupils. The narrow roads and lack of pavements will be a safety issues to pedestrians and cause vehicle congestion.
- Residents' driveways will be used for parking and turning
- Insufficient parking
- Of the parking spaces, 20 are to used for staff leaving only 36 spaces for the parents of 420 pupils. Assumptions about the number of children walking to school is unrealistic – made worse by the fact that children going to the school are from outside the local area
- Concerned if emergency access is required
- Parents will not just drop off children but will want to park and take the children into school – especially young children

- Parents will be arriving much earlier than the close of school to wait and park up, extending the times of disruption and congestion
- Speed bumps are breaking up as cars travel too fast over them
- Important to provide dropped kerbs and even paths – I use a mobility scooter
- Concerned at safety of existing children travelling to school with more traffic on local roads

School Places

- There is no demand from this local area for the school
- Local children already attend their local schools.
- Children attending this school are not from the Clearwater Drive area.
- The apparent need for the school is from children outside of the immediate area.
- New school should be built closer to Kingsway, Hunts Grove and Hardwicke where all the new building of houses is taking place.
- The Department of Education provides guidelines for outdoor play areas per pupil but this application fails to take these into consideration and the current proposal is below the recommendations.
- Previously decided that a school was not needed on this site
- The site is too small – was previously informed that the play areas are too small for a school with this many pupils.
- Any hiring out of the pitches would be unacceptable to residents with weekend and evening use
- The plans have change a lot since the public information event
- Was originally told this was going to be a single storey school for 200 children

Flooding

- May result in flooding to surrounding houses.
- Gardens to houses were flooded in 2007 and concreting over the site, will increase the risk of he houses flooding.
- The land acts as a flood plain holding water
- The development of the site and lots of hard surface area will affect surface water on the site.

Building Design

- Would be an eyesore
- Flat roof will allow for seagull nesting
- Is a monster of a building
- Was originally told this would be a single story building
- There are no other 2 storey schools in the area

Residential Amenity

- Building would be overpowering and overbearing, out of character and out of scale
- Will overlook surrounding gardens
- Will affect the quality of life of local residents

- Building right up to the boundary of existing houses is not acceptable
- Will massively change the quiet character of the area
- Harmful impact on residents
- Will increase pollution levels
- Construction period would greatly impact on the local area, with noise, disturbance, heavy traffic etc
- Residents are annoyed by the fence going up

Wildlife/Trees

- Area has a unique habitat, it should be protected and allowed to be a wildlife haven
- I have seen over 72 bird species here , 20 species of butterfly, at least 4 species of bats as well as slow worms, grass snakes, frogs, newts and toads
- The developers survey was done during a dry spell and does not reflect the wintering wetland and bird activity. A further survey should be done
- Loss of trees unacceptable

5.4 Representation from City Councillor Hannah Norman raising objections on the following grounds:

- Traffic Management, specifically the impact on local roads – the drop off system will not be suitable for parents of primary school children, living by a school I see fewer children walking to school than the transport data would suggest, 56 spaces for staff and parents is just not enough and there will be parking on local roads. Neither Meadowside or Beech Green have similar circumstances to this site but Fieldcourt is more similar and does experience traffic and parking problems.
- The size of the plans presented for the proposed school – the public consultation proposed a single form entry school and it is understood that a much larger building is now proposed to comply with funding requirements. The size of building now proposed, and at two storeys, takes up much of the site and makes this site inappropriate.
- Loss of Public Open Space – the site has been enjoyed and well used by local residents for over 20 years, the area has an inadequate level of open space and there is no compensation for its loss. The site is of wildlife interest and has been subject to flooding.
Demand for School Places – considers that there is demand within existing schools to meet demand from Quedgeley and that it is actually demand from further afield (Hardwicke) that causes the significant increase in demand for places. There is no justification for providing the school on this site and a school should be provided closer to the new housing developments.

5.5 Representation from County Councillor Mark Hawthorne raising objections on the following grounds:

- Loss of Public Open Space – been used by local residents for over 20 years, area already lacking in open space, impact on wildlife, flooding concerns.
- Impact on Local Roads – the schools chosen schools as traffic comparisons ie Meadowside and Beech Green have different circumstances to this proposal and the Fieldcourt schools would be better comparison where there is traffic chaos in the morning and evening on local roads not designed to take such high vehicle movements.
- Size of the proposals – original proposal was for a single form entry school this has now doubled. Site is too small for a size of building proposed and there will be a visual impact together with an impact on residents quality of life.
- Demand for school places – new schools are normally built within new residential developments. The planning statement highlights new build in the area at Sellars Bridge and Mayos Land and in considering the new housing taking place in Hardwicks, a new school should be built in a more suitable site not on the middle of a 20 year old housing estate.

5.6 16 representations in support have been received raising the following issues:

- Great opportunity for the local community, this piece of land has always been intended for educational purposes.
- More Primary schools are needed in the area because of the growing population and the local schools are over subscribed
- We need another primary - and secondary- school.
- I intend to be a proactive, helpful & respectful part of the school community & that will take local residents into account; A residential area would benefit from a school being constructed.
- As the housing stock increases, so should the infrastructure to support the people.
- Given the number of family houses in the area, a primary school in easy walking distance would be a boon.
- A school there is preferable to houses.
- The Hardwicke/Quedgeley area and seen a huge amount of new housing in recent years, but, we are severely lacking in community services to accompany all the new families that are moving into the area.
- More school places are urgently needed within Quedgeley and this is a good location-big enough and close to many children's homes to enable walking to school.
- The proposed drawings of the building are aesthetically pleasing and will sit well on the site.
- A good school will enhance local property prices.
- Quedgeley is a green and open place and the loss of this land will not negatively impact upon the local area. It is, in essence, wasteland currently.
- The school together with more community facilities are required.

- The provision of new community facilities have not kept up with all the house building
- This is the most perfect setting for a new school, fresh air, close to the countryside
- The school will reduce class numbers in other schools
- Parking will only be an issue for a short period in the morning and then again in the afternoon – most people are at work- and many people will walk to school.
- Should generate some needed employment for the area

5.7 The full content of all correspondence on this application can be inspected at Herbert Warehouse, The Docks, Gloucester, or via the following link, prior to the Committee meeting:

<http://planningdocs.gloucester.gov.uk/default.aspx?custref=17/00729/FUL>

6.0 OFFICER OPINION

Legislative background

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Local Planning Authority to determine planning applications in accordance with the Development Plan, unless material considerations indicate otherwise.

6.2 Section 70(2) of the Town and Country Planning Act 1990 (as amended) states that in dealing with a planning application, the Local Planning Authority should have regard to the following:

- a) the provisions of the development plan, so far as material to the application;
- b) any local finance considerations, so far as material to the application; and
- c) any other material considerations.

6.3 It is considered that the main issues with regards to this application are as follows:

- Site history and plan allocations
- Need for a school
- Existing use of the Site;
- Loss/Development of Open Space
- Design of the School Building
- Residential amenity
- Archaeology
- Land Contamination
- Drainage and Flood Risk
- Levels
- Trees and Landscaping
- Ecology

- External Lighting
- Economic Considerations
- Traffic and Transport

Site History and Plan Allocations

- 6.4 The various allocations for the site across various have been fully detailed within the policy section of the report. However further examination of this is required.
- 6.5 The site was originally within the administrative boundary of Stroud District Council and was included within a much wider area granted permission for residential development in 1981 and a later consent in 1986 relating to the Glevum land. It is understood that the site was originally identified in the Stroud District–Gloucester City Council Quedgeley/Hardwicke Planning Policy Statement 1990 as a primary school site and an area of open space with play area.
- 6.6 In February 1991 there was a Deed of Variation to the previously agreed legal Agreement that “reduced the amount of public open space to be dedicated on site and to acquire the additional land for school purposes”. The site then came within the administrative boundary of the City Council in April 1991 and the site was identified as being reserved for a school within the City of Gloucester (Additional Areas Post 1991 Boundary Extension) Local Plan Interim Adoption Copy October 1996.
- 6.7 Since that time the site has been subject to a number of allocations for either a school or public open space or for residential development including public open space as set out below.: The allocations have reflected the changing position as to whether the site has been required for a school or not, as follows:

Second Stage Deposit Local Plan 2002

Land reserved for primary school or if the site is no longer need for a school then open space.

Local Development Framework (Preferred Options) 2006

Open space with limited residential development of 30 dwellings.

Draft Clearwater Drive Supplementary Planning Document

Residential development of a small part of the site, approximately 1 hectare, with the remaining land to be used as public open space.

Gloucester City Plan 2017

Two Form Entry Free School, or

15 – 30 dwellings plus enhanced public open space provision including large children’s play area

The Need for a School

- 6.8 Paragraph 72 of the NPPF relates specifically to proposals to provide new schools or extend existing schools.

The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- *give great weight to the need to create, expand or alter schools; and*
- *work with schools promoters to identify and resolve key planning issues before applications are submitted.*

Government Policy statement – planning for schools development dated August 2011

- 6.9 This guidance details the Governments commitment “to support the development of state funded schools and their delivery through the planning system”.

This sets down the following principles:

- *There should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework.*
- *Local authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools in their planning decisions*
- *Local authorities should make full use of their planning powers to support state-funded schools applications.*
- *Local authorities should only impose conditions that clearly and demonstrably meet the tests set out in Circular 11/95.*
- *Local authorities should ensure that the process for submitting and determining state-funded schools’ applications is as streamlined as possible. A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority. Given the strong policy support for improving state education, the Secretary of State*
- *Appeals against any refusals of planning permission for state-funded schools should be treated as a priority.*
- *Where a local planning authority refuses planning permission for a state-funded school, the Secretary of State will consider carefully whether to recover for his own determination appeals against the refusal of planning permission.*

The policy statement is available in full at the following link

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf

6.10 Policy INF 4 of the JCS requires the provision of social and community infrastructure to meet the needs of local communities, stating that it should be centrally located to the population that it serves. Explanatory paragraph 5.5.1 provides that everyone living and working in the JCS area should have access to facilities that meet their everyday needs and identifies that essential social and community infrastructure includes schools. This policy has more of an emphasis on providing new community provision together with new residential developments. However in the explanatory text it does state *“infrastructure for health, social care and education are essential community facilities that will need to be assessed in accordance with the NPPF.”*

6.11 There are no policies in the 2002 Plan that relate specifically to the provision of new and/or additional educational facilities other than the recognition of land allocations for new primary schools at policy CS8. However supporting text at para 11.22 in relation to general education states that

“when new schools or extensions to schools are proposed we will seek to ensure that proposals do not give rise to adverse effect on the surrounding neighbourhood, as set out in policies BE20, BE21 and TR31.”

6.12 However schools are within the definition of community facilities and Policy CS2 relates to the provision of new community facilities:

Policy CS.2 Provision of New Community Facilities

Planning permission for new community facilities will be permitted:

- 1. in or adjacent to a designated centre; or*
- 2. within residential areas in locations accessible by other means of transport than the private car, provided it is demonstrated that a suitable site is not available or that the need cannot feasibly be met in or adjacent to a designated centre.*

In residential development or mixed-use schemes the City Council will expect developers to reserve land in accessible and appropriate locations that are accessible by a choice of means of transport other than the private car, and provide appropriate community facilities or financially contribute towards their provision, to meet the needs of the future residents of such developments.

6.13 Attached as an Appendix to this report are two letters, one from the Diocese of Gloucester Academies Trust and one from the Applicant, Education and Skills Funding Agency. I understand that these letters have also been circulated to all Planning Committee Members.

6.14 These letters provide important information regarding the requirement for school places. The supporting information demonstrates that there is a need for additional school places within the Quedgeley area referring to the need to find 240 places by 2020. Also, without a planning permission for a permanent school site for Clearwater primary, the funding for a temporary expansion on the temporary site at Hardwicke is unlikely to be forthcoming and the school may need to close. Additionally, further delay to this project would put considerable pressure on Gloucestershire County Council to identify and allocate sufficient school places for the next academic year. They conclude

that there is strong policy support for new schools and the application should be granted.

- 6.15 It should also be noted that there have been 16 representations submitted, supporting the development of the site for a school, quoting the lack of school places in the local area, the fact that the site has been allocated for a school for many years and the need to provide adequate community facilities to meet the demands of families.
- 6.16 Taking all the above into account and in accordance with Government guidance in the NPPF, JCS Policy INF4 and 2002 Plan policy CS.2 it is considered that the need for a new school has been demonstrated.

Existing use of the site.

- 6.17 It is clear from the letters that have been submitted, that the area forms an important amenity space for local residents. It is an open space however it is not a formally designated public open space, although it has had open access for residents for over 20 years.
- 6.18 The planning statement submitted with the application states that

The site currently comprises informal open space, which is laid out with grass and trees and crossed by informal footpaths. However, it is important to note that the land is not formally designated as public open space with access granted by the County Council on an informal basis only.

- 6.19 The definition of open space within the NPPF is
Open space: All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
- 6.20 The Planning Practice Guidance refers to open space as
Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks however the land is not formally designated public open space.
- 6.21 The interpretation within the Town and Country Planning act 1990 states:
“open space” means any land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground;
- 6.22 On the basis of the above definitions, and advice from One Legal, I conclude that the existing use of the site is as open space.

Loss/Development of Open Space

- 6.23 The site is within the land ownership of Gloucestershire County Council and it has been undeveloped for many years. It has never formally been adopted as public open space although the public have had full access onto and across the site.
- 6.24 As I conclude above, the site constitutes open space in terms of the definition within the quoted legislation and planning guidance, however it is not *public* open space. Therefore the application requires assessment on the basis that the development of the site would result in the loss of open space.
- 6.25 As a general principle, planning policies and guidance seek to protect open spaces, other than in exceptional circumstances and where open spaces are to be developed, replacement facilities should be provided unless an assessment identifies that it is no longer required.

Paragraph 74 of the NPPF states

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

The NPPF also recognises the importance of open space to the health and well being of communities

- 6.26 The Planning Policy Guidance advises on how open space should be taken into account in planning.

Open space should be taken into account in planning for new development and considering proposals that may affect existing open space (see National Planning Policy Framework paragraphs 73-74). Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure (see National Planning Policy Framework paragraph 114), as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development (see National Planning Policy Framework paragraphs 6-10).

- 6.27 Policy SR.2 within the Revised Deposit Local Plan is specifically relevant to proposals relating to open space.

The City Council will oppose development proposals which involve the loss of playing fields, formal and informal recreational open space and their ancillary facilities unless:

1. *The redevelopment of a small part of the site will secure the retention and improvements of the available sports and recreation facilities, in which case the retention and improvement of such facilities shall be subject to a planning obligation, or*
2. *Alternative provision of facilities of equivalent benefit or better recreational standard in terms of quantity and quality is made available at another appropriate and equally accessible location, or*
3. *A clear long term excess of sports pitch provision in the city and public open space in the area can be shown to exist, taking account of the recreational and amenity value of such provision, or*
4. *The proposed development is for an indoor sports facility, which would provide sufficient community benefit to outweigh the loss of the playing field or recreational open space.*

Additionally policy ST3 in the 2002 Plan states that “land with recognised nature, landscape or recreational value will be protected appropriately according to its value unless there are exceptional circumstances”

- 6.28 Similarly policy INF 3 of the JCS requires that the existing green infrastructure network of local and strategic importance be conserved and enhanced and that development proposals should contribute positively towards green infrastructure. Additionally that existing green infrastructure will be protected in a manner that reflects its contribution.
- 6.29 The site has been accessible to the public and used for amenity and recreational purposes for well over 20 years and it is only recently, since August 2017, that the site has been fenced off. The application provides for some replacement open space provision within the grounds of the school, as set out at section 1.3 of the report, however this is not considered to be an equivalent or better provision in terms of quality and quantity as required by the NPPF.
- 6.30 Furthermore there is a lack of open space within the Quedgeley area and particularly the Severnvalle ward. This is recognised by the assessment of the ward within the Councils Open Space Strategy which states

In total, the ward has 7.71ha of open space, a provision of 1.08ha per 1000 population, which falls well short of the proposed open space standard of 2.8ha per 1000.

An area of undeveloped land at Clearwater Drive is currently well used by residents for informal recreation, linking to the city council’s Clearwater Drive open space (QS9) and canalside park. This site is owned by the County Council and was originally reserved for a possible school site. However, there may be future plans to develop the site for housing. Any proposals will need to give consideration to the wildlife using the site and provision of open space would be required as part of the new development.

- 6.31 The development of this site for a school will result in the loss of open space and therefore conflicts with the above policies that seek to protect open space. Additionally it is also recognised that the Severnvale ward does have a significant under provision of open space and further loss would compound this.

Design of the School Building

- 6.32 The NPPF states that new residential developments should be of high quality design, create attractive places to live, and respond to local character integrating into the local environment. Policy SD4 and SD14 of the JCS sets out requirements for high quality design. In the 2002 Plan policies including ST7, BE1, BE4, BE5, BE6 and BE7 seek to ensure that new developments are of good design

The school is designed as a predominantly two storey building, but incorporating a single storey element to the western end. The building is designed with a flat roof to a height of 7.4 metres 8 slightly higher at the entrance feature at 7.8 metres. It has a horizontal emphasis defined by the use of contrasting materials to each floor i.e. brickwork to the ground floor and timber cladding to the first floor. Metallic cladding is proposed to highlight other features including the main two storey entrance feature.

- 6.33 1.2 metre high railings and matching gates to each of the access are proposed to the frontage of Clearwater Drive. All other boundaries would have 1.8 metre high green weld mesh fencing. A landscape buffer and tree planting is also proposed to the Southern boundary, most of the eastern boundary and part of the northern boundary.
- 6.34 The school building will be visible from Clearwater Drive, from the Canal Path open space and from the surrounding residential properties. The flat roof design is not in keeping with the pitched roof design of neighbouring houses however this design does keep the overall height of the building lower and result in less prominence and therefore less visual impact within the local area. Appropriate planting, as discussed later with the report, will also assist in providing a green setting to the building and its assimilation into the very open character of the site.
- 6.35 I consider that the proposed scale and design of the school building is acceptable in this location. I have raised some concerns with the use of buff brick and requested a material sample board, however this has not been submitted to date

Residential Amenity

- 6.36 Paragraph 17 of the NPPF provides that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. This is reflected in Policy SD4 and SD14 of the JCS which requires that new development must cause no

unacceptable harm to local amenity including the amenity of neighbouring occupants and Policy BE.21 of the 2002 Plan which seeks to protect amenity.

- 6.37 Many of the surrounding residential properties directly face onto and have views from windows into and across the site. There is no doubt that the outlook from these properties would change with the construction of the school. The school elevations facing boundaries contain windows to classrooms, however given the distances to boundaries (which at the closest point on the southern boundary is 20 metres from residential gardens), I do not consider that the building would result in unacceptable levels of overlooking.
- 6.38 Taking into account the height of the proposed building, its siting, distance and location to the north of the closest properties, I consider that the overall relationship with adjoining properties would be acceptable and that the design of the building would not appear overly dominant, overbearing or result in overshadowing to surrounding dwellings.
- 6.39 Therefore I consider that the physical impacts of the school building would not have an acceptable impact upon the amenity of surrounding residential properties. However an assessment of the other elements of the school and associated activity require further assessment.
- 6.40 JCS Policy SD14 also requires that new development must not result in unacceptable levels of noise pollution and policy SD4 states that new development should avoid or mitigate potential disturbances including noise. Policy FRP10 within the 2002 Plan states that planning permission will not be granted for development that would result in unacceptable levels of noise.
- 6.41 The site is immediately adjacent to residential boundaries on the full extent of the southern and eastern boundaries and along part of the northern boundary. There is no doubt that the development of this site will generate a level of noise and disturbance to surrounding properties, not currently experienced. The proposed plans include a variety of soft and hard play areas for children situated around the building together with a grass pitch and multi use games area (muga) proposed to the eastern side of the building. Of particular concern regarding the impact upon residents is the noise and disturbance associated with the use of the proposed muga and playing field. Both these facilities are located to the eastern boundary of the site and within very close proximity to the site boundaries which along much of their length is also immediately adjacent to existing residential properties in Hasfield Close, Eldersfield Close, Aspen Drive and Brockeridge Close.
- 6.42 The plans indicate the edge of the pitch between 5 and 6 metres from the boundary of the site and muga just over 7 metres from the boundary. The boundary is immediately adjacent to residential property garden boundaries along most of its length.
- 6.43 Fields in Trust, who are the operating name of the National Playing Fields Association, have produced guidance "Guidance for outdoor sport and Play:

Beyond the six acre standard” dated October 2015. This recommends a 30 metre minimum separation between the activity zone of a muga and a residential boundary. The City Council Supplementary Planning Guidance dated June 2001 “New Housing and Open Space” also requires a 30 metre buffer. The explanatory note states “the purpose of a buffer zone is to provide a reasonable degree of separation between play or sport activity and nearby residential properties”. There is no suggested buffer zone for playing pitches in either document.

- 6.44 In terms of this proposal there are approximately 50 dwellings that would be within 30 metres of the muga and playing pitch. The distance from the playing pitch to the closest garden boundary is at the closest point is just under 6 metres. And there are 4 properties where the dwelling itself is between 6 and 7 metres from the pitch boundary. The distance from the muga to the closest garden boundary is just over 7 metre. These distances are obviously well below the recommended 30 metres and therefore it is considered that surrounding properties will experience noise and disturbance from their use.
- 6.45 Following a request from officers, the applicant has submitted a noise assessment. This has assessed specific examples of use of both the muga and the playing pitch.
- 6.46 The muga has been assessed on the basis of its use by 10 children (i.e. a 5 side football match), with a noise source from 5 children. The pitch has been assessed on the basis of 14 children (i.e. a seven a side match), with a noise source from 7 children.
- 6.47 The World Health Organisation Guidelines for Community Noise set out health-based guideline values for community noise, including recommended noise level values for the onset of sleep disturbance, annoyance and speech interference for the general population. Guideline values are provided for outdoor living areas, living rooms and bedrooms, for both continuous noise and discrete noise events:
- a. Living rooms (daytime) LAeq,16hour 35dB(A);
 - b. Bedrooms(daytime) LAeq, 16hour 35dB(A);
 - c. Bedrooms(night-time) LAeq, 16hour 30dB(A);
 - d. Bedrooms (night-time) LAFmax 42dB(A);
 - e. Bedrooms external (night-time) LAeq,8hour 55dB(A); and
 - f. Gardens LAeq, 16hour 50dB(A) lower limit and 55 dB(A) upper limit.
- 6.48 The report identifies that at the level of usage assessed; there are two properties that would experience noise at 50db, which is within the lower limit of the external space standards set by the WHO Guidelines. However with more intensive use of the facilities, the level of noise would be expected to rise and potentially affect additional properties. There about 10 properties where noise levels are within the 45 – 49 db range,
- 6.49 The Councils City Centre Improvement Officer (Environmental Protection) has raised a number of concerns with the level of information within the noise assessment, as set out in detail in his comments at section 4.11.

- 6.50 Officers have advised the applicant of concerns regarding the potential noise and disturbance to surrounding properties and suggested that the applicant may wish to consider an amended layout with the noisiest elements of the proposal moved away from the sensitive residential boundaries. However the applicant wishes the application to proceed for Committee determination on the basis of the plans as submitted.
- 6.51 One of the core planning principles of the NPPF is to always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Additionally the NPPF stresses the importance of good design and that states planning should contribute to making places better for people, that developments should function well and add to the overall quality of the area and that planning should address the connections between people, places and the integration of new development into the natural built and historic environment. Furthermore it states that decisions should plan positively for the provision of community facilities to enhance the sustainability of communities and residential environments and ensure an integrated approach to considering the location of housing and community facilities.
- 6.52 In accordance with the NPPF, Policy SD4 of the JCS promotes high quality design and sets down principles that should be followed. It requires that development should make a positive contribution to providing better places for communities. It recognises that high quality and well thought out design, tailored to meet the needs of people and location, is a key element in producing attractive, sustainable places in which people will want to live, work, play and relax. The principle of good design is also promoted in policies in the 2002 Plan including BE.4 and BE.7.
- 6.53 I note that the design and access statement also considers a number of options for the development of the site including a building of a different design and shape and different positioning across the site. As with most sites there are a number of constraints including surface water flooding, ecology, levels and residential boundaries, and these will all influence the overall design process. I considered that the proposed design and layout has given insufficient importance to reducing the impact of the development upon the surrounding residents. As detailed above, the proposed muga and marked out playing pitch are on the least favourable part of the site in terms of residential amenity being within a few metres of the boundary of the site
- 6.54 I do consider that the overall layout of the school conflicts with the above design guidance and has not been well thought out or designed to respect and integrate with the existing built environment, would not make a positive contribution and does not address the sensitive nature of the adjoining residential boundaries. I therefore conclude that the scheme represent a poor overall design in terms of layout that would result in harm to the amenity of surrounding residential properties.

Archaeology

- 6.56 The NPPF requires that in determining applications, Authorities should take account of;
- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;*
 - *the desirability of new development making a positive contribution to local character and distinctiveness.*
- 6.57 Policies BE31, 32, 33, 34, 36 and 37 of the 2002 plan lay down the criteria for assessing sites with archaeological interest, together with the requirements for site evaluation and recording. Policy BE23 seeks to ensure that development does not adversely affect the setting of listed buildings. JCS Policy SD8 stresses the importance of heritage assets and their contribution to local character and identity. Furthermore the policy requires that heritage assets and their settings are conserved and enhanced as appropriate to their significance.
- 6.58 An evaluation of the application site has already been undertaken with the excavation of trenches across the site in August. As referred to above in the Citys Archaeologist comments, nothing of significance was found and therefore no further archaeological assessment or investigation is required.

Land Contamination

- 6.59 Policy SD14 of the JCS and Policy FRP15 of the 2002 Plan require that development proposals incorporate the investigation and remediation of any land contamination
- 6.60 The City Council's Contaminated Land Advisors (WRS) has reviewed the submitted documentation. They have also identified that the historic maps show that the proposed development is adjacent to Quedgeley landfill site, and that the Environment Agency's website shows that the landfill extends over the site of the proposed development. However they note that the submitted documents did not identify this.
- 6.61 Following the submission of further information they note that during the site investigations undertaken, no evidence of significant made ground or landfill has been encountered and that the additional 5 ground gas monitoring visits proposed by the applicant are considered necessary, given the uncertainty to characterise the ground gas regime at the site together with additional soil testing. Conditions are recommended requiring further site investigation prior to the commencement of any development of the site and the application of the standard contamination conditions.

Drainage and Flood Risk

- 6.62 The NPPF requires that development is directed to the areas at lowest risk of flooding, that new development should take the opportunities to reduce the causes or impacts of flooding, should not increase flood risk elsewhere and take account of climate change. Policy INF2 of the JCS reflects the NPPF,

applying a risk based sequential approach, requiring new development to contribute to a reduction in flood risk and requiring the use of sustainable drainage systems. Policy FRP1a of the 2002 Plan also promotes the risk based approach and policy FRP6 requires the provision of appropriate surface water disposal

- 6.63 The site lies within Flood Zone 1 which is land with the lowest probability of flooding, however given that the site area is over a hectare, a flood risk assessment has been undertaken. The site is subject to some surface water flooding and ground water flooding.
- 6.64 The submitted proposals have been assessed by the City Council's Drainage Adviser and Gloucestershire County Council in their role as the Local Lead Flood Authority. They advise that the applicant proposes to discharge the surface water from the development at a controlled rate through the existing bund and into the wetland behind. Surface water naturally will flow to this area and this strategy will ensure the existing wetland receives water to remain an effective habitat. The additional surface runoff from the sports field will also flow to this area. Surface water will be attenuated in geocellular underground storage sufficient, together with the proposal to utilise permeable paving in the car parking area for the 1 in 100 year storm (including 40% increase for climate change).
- 6.65 This is considered acceptable subject to conditions requiring full details of the proposed surface water drainage scheme, timetable for implementation and a management and maintenance plan.

Levels

- 6.66 The site is quite undulating and considerable level changes across the site are proposed. The applicant has provided a "cut and fill plan" which details these works, Generally land is being lowered within the central part of the site and the land to the east and west being increased, which includes providing a level area to the footprint of the school and the adjoining areas including the pitch and muga. There is the potential for run off from the areas along the eastern boundary to the adjacent residential garden boundaries. Additionally it is not clear how level changes may impact on the areas along the boundary of the grass pitch. The change in levels here appears to be about 30cm closest to the boundary so further clarification on this has been requested from the applicant.
- 6.67 Subject to additional information indicating that the proposal will not result in adverse runoff implications for adjacent residential properties, it is considered that the proposal is acceptable in terms of flood risk and drainage implications.
- 6.68 **Trees and Landscaping**
Guidance in the NPPF seeks to conserve and enhance the natural environment, promote biodiversity and protect wildlife. policy B10 of the 2002 Plan requires the retention of important trees and hedgerows and

compensatory replacement when this is not possible. JCS Policy INF3 provides that green infrastructure will be conserved and enhanced.

All trees within the main part of the site are to be removed. None of the trees are of particular value individually, and are not of a quality to warrant a Tree Preservation Order. However it is accepted that together as a group and a feature on the site, they do have some amenity value and also some ecological value. The trees to the western part of the site are to be retained

- 6.69 The landscape masterplan details proposed replacement tree planting across the site. The Landscape Adviser has suggested some alternative tree species and planting which provides more wildlife habitat, educational potential and is more in keeping with the semi natural setting. Additional further planting would be required to soften the edges of the site particularly along the car park frontage and some larger trees would help integrate the site with the Canaslide open space.
- 6.70 It is considered that landscaping details could be dealt with by a condition requiring the submission of amended information encompassing the suggestions made by the Landscape Adviser.

Ecology

- 6.71 Guidance in the NPPF seeks to conserve and enhance the natural environment, promote biodiversity and protect wildlife. Policies B7 and B.8 of the 2002 Plan and SD9 of the JCS, also require development to contribute positively to biodiversity and for necessary mitigation to be provided.
- 6.72 The site, together with the land to the North and the remaining County Council land to the west is designated as a key Wildlife Site. In relation to locally designated sites, such as Key Wildlife sites, policy SD9 of the JCS states: *Development within locally designated site will not be permitted where it would have an adverse impact on the registered interest features or criteria for which the site was listed, and harm cannot be avoided or satisfactorily mitigated.* Similarly policy B2 and B3 of the 2002 Plan seek to protect locally designated sites and require mitigation of compensatory habitats to ensure that the long term biodiversity value of the area is enhanced.
- 6.73 The application includes a Protected Species Survey Report, Great Crested Newt addendum and an Ecological Mitigation and Enhancement Plan. The site has specific amphibian interest; specifically, frog, toad and smooth newt. The site also has a high population of slow worms and also comprises a bat foraging area. Work has already been undertaken to clear the site of slow worms and reptiles and reptile proof fencing is currently in position.
- 6.74 The submitted reports have been assessed by the Council's Ecological Adviser who concludes that the proposed mitigation plan is acceptable subject to "an area of suitable habitat for amphibians and reptiles, available now and in the future is secured and agreed". The adviser identifies that the creation a pond would enhance the habitat for amphibians and recommends conditions requiring, a full landscape and ecological management plan, a construction

method plan and full details of lighting proposed on the site. Subject to this, it is considered that the proposed development is acceptable in terms of implications for ecology.

External Lighting

- 6.75 The submitted external lighting plan submitted with the application proposes a variety of lighting comprising freestanding lighting to the car park and around the building and for individual lights to be attached to the building and fencing. Further bollard lighting is proposed to the walkway from the building to the pedestrian access to the eastern boundary. The pedestrian access is now proposed to Eldersfield Close and the lighting plan has not been updated to reflect this. The submitted details do not provide full details of heights of the free standing lights and further clarification has been sought from the agent. Full details of the lighting proposals are required to be able to consider any potential impacts upon both residential amenity and ecology; however it is considered that these details could be dealt with by a condition requiring the submission of further information.

Economic considerations

- 6.76 The development of the school would create jobs 19 full time and 29 part time jobs adding to local employment opportunities while the construction phase would also support employment opportunities. Additionally, the provision for an additional primary school is likely to have benefits for educational achievements which will also be of benefit for and therefore the proposal would have some economic benefit for the economy. In the context of the NPPF advice that 'significant weight should be placed on the need to support economic growth through the planning system', this adds some weight to the case for granting permission.

Traffic and Transport

- 6.77 The Highway Authority comment that whilst the review has raised some concerns regarding trip rate methodology, the County Council is satisfied that there is sufficient capacity within the network study area to accommodate traffic generated by the proposed development.
- 6.78 The car park provision and layout is sufficient for drop-off/pick-ups and provides adequate provision for the peak parking demand. The circulatory nature of the car park is legible with a clearly defined drop-off area that will be managed by school staff. Therefore the school has provided adequate parking provision to minimise prejudicial or ad-hoc parking occurring upon the Local Estate Roads. However, this does not mean that no on-street parking will occur. It is expected that some on-street parking may occur, however this will occur with a short spike of activity before quickly returning to normal without adversely affecting the operation and safety of the highway. The school cannot prevent people from parking upon the highway, which does not feature parking restrictions, but the Highway Authority considers that applicant has provided adequate means to reasonably manage the impact. The School

Travel Plan is generally acceptable subject to the identified issues being addressed when the full School Travel Plan is submitted.

6.79 The Highway Authority considers that the transport and traffic implications of the proposal are acceptable subject to conditions dealing with the following matters:

- Requirement for a construction method statement
- Access road material and position of gates onto Clearwater Drive.
- Provision of parking for cars, cycles and scooters in place before the building is opened and thereafter maintained.
- Provision of tactile paving at identified crossing points
- Car parking management scheme to be agreed
- Provision of disabled parking
- Provision of pedestrian and maintenance accesses.
- Requirement for a travel plan
- Requirement for a school safety zone.

7.0 CONCLUSIONS

7.1 The development of this site raises a number of planning issues that require careful balancing.

7.2 The site was originally identified for the erection of a school in 1990 but an application to actually build a school on the site has not been submitted until now. Supporting information demonstrates that there is now a need for additional school places in the local area and Government policy strongly promotes the presumption in favour of development for schools. The provision of a new school is, in principle, a significant public and community benefit of the application, and one which should be afforded significant positive weight in the planning balance.

7.3 However the site has remained undeveloped and it is currently used, and has been used for many years, by the local community, as open space. It is clear from the comments, and number of representations submitted by local residents, that it is a valued and important amenity within the local area. It is also recognised that the local area has a deficit of open space. I therefore conclude that the loss of the open space with insufficient mitigation or replacement represents a significant loss to the local community and should be afforded considerable negative weight in the planning balance.

7.4 There are serious concerns with the design of the layout of the school and its facilities. The proposed layout fails to reflect local design policies and guidance in the NPPF which promotes high quality design and requires that new developments make a positive contribution to communities and integrate with existing environments. The proposed playing facilities are to be sited in the least favourable part of the site in terms of their closeness and relationship to the surrounding residential properties. The Fields in Trust Guidance and the Councils guidance both recommend a 30 metre buffer between a muga and a residential boundary to prevent nuisance. A noise report has been submitted

however there are concerns with the scenarios that have been assessed and the level of information that is included. Overall I consider that the proposed layout of the site has failed to address the importance of protecting amenity of surrounding residential properties that will experience noise and disturbance from the site.

- 7.5 The elevational design of the building is considered acceptable in this location and should have an acceptable relationship with the neighbouring residential properties in terms of its physical impacts and have an acceptable appearance from Clearwater Drive and from the Canalside Walk
- 7.6 The Highway Authority conclude that the proposal is acceptable in terms of highway and parking matters subject to the conditions as stated.
- 7.7 Matters relating to ecology, levels, materials and some discrepancies and conflict within the plans have not yet been fully addressed. Other issues including contamination, lighting, drainage, landscaping could be appropriately dealt with by conditions.
- 7.8 The school will generate local employment opportunities, during and after construction and this has some limited weight in the overall consideration of the application.
- 7.9 Therefore in terms of the assessment of the principal issues, I consider that the benefits arising from the provision of a new school are outweighed by the loss of open space, and the harm to residential amenity arising from the poor design of the proposed layout of the school buildings and facilities.

8.0 RECOMMENDATIONS OF THE GROWTH AND DELIVERY MANAGER

That subject to clarification and resolution of the outstanding issues relating to ecology, levels, materials and some discrepancies and conflict with the submitted plans,

That planning permission is refused for the following reasons:

Refusal Reason 1

The development of this site would result in the loss of an important open space highly valued by local residents, in an area where there is already a shortfall of open space. Insufficient mitigation or replacement facility has been proposed to compensate for this loss. The proposal is therefore contrary to Policy INF3 of the Joint Core Strategy, Adoption Version 2017, Policy SR2, ST3 and BE21 of the Gloucester City Council Revised Deposit Local Plan 2002 and guidance within the Planning Policy Guidance and the NPPF

Refusal Reason 2

The layout of the proposal constitutes poor design in that it proposes to site the multi use games area and playing pitches in close proximity to neighbouring dwellings and therefore is likely to result in unacceptable noise

and general disturbance for nearby dwellings. Therefore it is considered that the proposal is contrary to Policies SD4 and SD14 of the Joint Core Strategy, Adoption Version 2017 and Policies ST7, BE4, BE7, BE21 and FRP10 of Gloucester City Council Revised Deposit Local Plan 2002, and contrary to the Gloucester City Council Supplementary Planning Guidance “New Housing and Open Space and the guidance and principles set down within the Planning Policy Guidance and the National Planning Policy Framework.

Decision:

Notes:

.....

.....

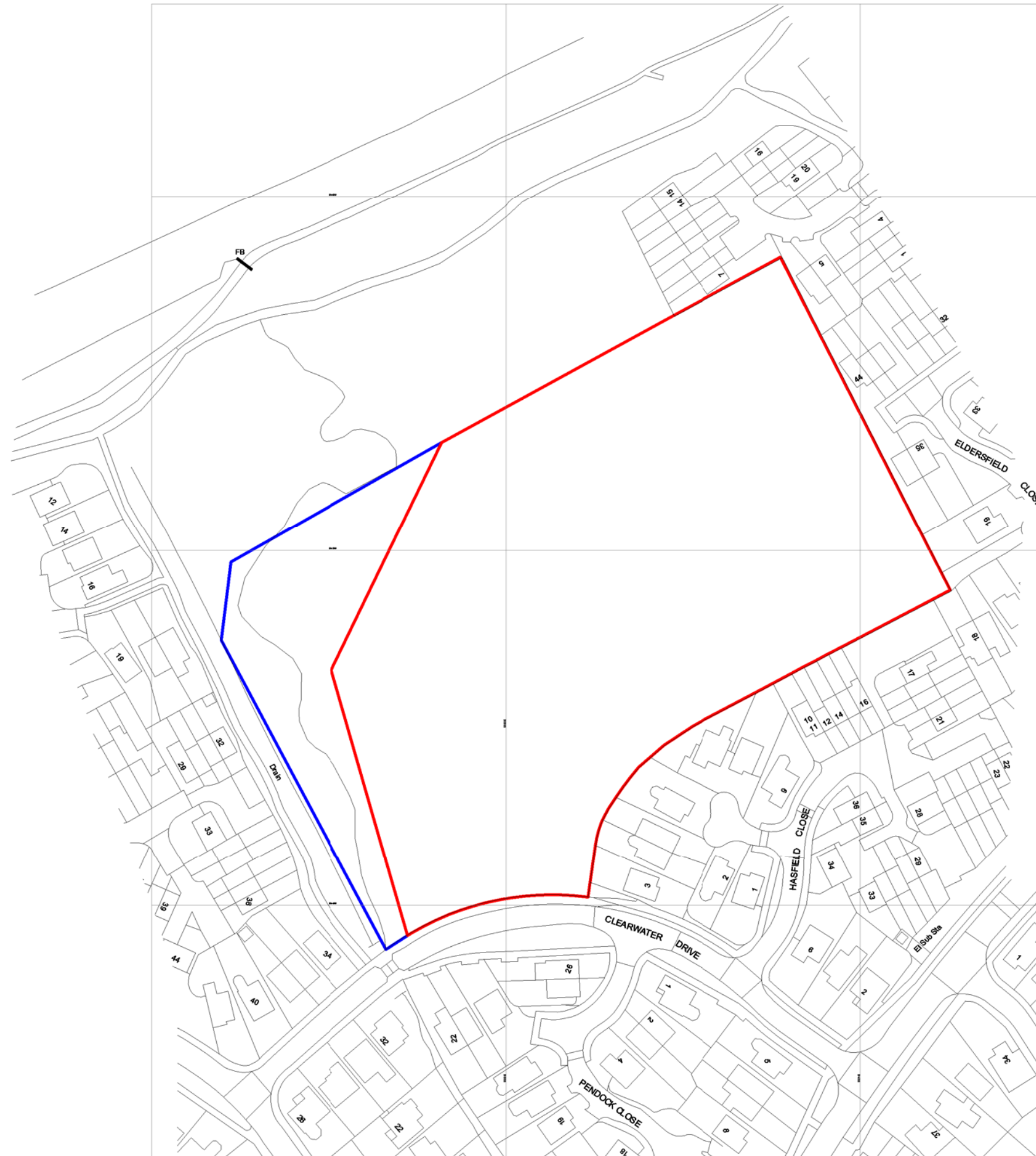
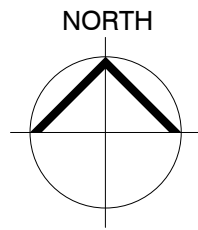
Person to contact: Joann Meneaud
(Tel: 396787)

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Rev. Date Description

P1 28.06.2017 Issued For Planning
P2 19.07.2017 Issued for Planning



PROJECT
Clearwater C of E Primary School

CLIENT
KIER Central

DRAWING
Proposed Site Location Plan

STATUS
PLANNING

ROBERTS LIMBRICK LTD

The Carriage Building, Bruton Way
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Registered Office: England No. 06658029

SCALE ORIGINATOR NO

1 : 1250@A3 8302

DATE AUTHOR

05/31/17 BP

DRAWING NUMBER:

8302-RLA-PL01 P2

PROJECT | ORIGINATOR | ZONE | LEVEL | TYPE | ROLE | NUMBER



South Elevation



North Elevation



East Elevation



West Elevation

- Key
- | | | |
|--|--|---|
| Mat 01 - Engineering grey brick | Mat 04 - Aluminium rainscreen cladding (to a similar colour as school logo) | Mat 07 - Dark grey aluminium framed doors with ventilation louvers |
| Mat 02 - Multi buff brick | Mat 05 - Dark grey aluminium framed windows and doors | Mat 08 - Dark grey aluminium framed curtain glazing |
| Mat 03 - Timber effect vertical rainscreen cladding | Mat 06 - Dark grey aluminium framed | Mat 09 - Glazed spandrel (to a similar colour as school logo) |

Roberts Limbrick ARCHITECTS

PROJECT
Clearwater C of E Primary School

CLIENT
-

DRAWING
Proposed Elevations

STATUS
PLANNING

ROBERTS LIMBRICK LTD
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SCALE
1: 100@A1

ORIGINATOR NO
8302

DATE
05/31/17

AUTHOR
BP

DRAWING NUMBER
8302-RL-A-PL05

REVISION
P3

PROJECT ORIGINATOR, DATE LEVEL TYPE, ROLE, NUMBER



KEY

SOFT LANDSCAPE

- Existing vegetation to be retained
- Proposed trees - Entrance - planted into 300mm topsoil (freused) & 600mm subsoil
- Proposed trees - Entrance Feature Tree - planted into 300mm topsoil (freused) & 600mm subsoil
- Proposed trees - Clearwater Drive Frontage - planted into 300mm topsoil (freused) & 600mm subsoil
- Proposed trees - School Grounds - planted into 300mm topsoil (freused) & 600mm subsoil
- Proposed trees - Forest School Area - planted into 300mm topsoil (freused) & 600mm subsoil
- Landscape buffer - native tree & shrub planting - with 300mm topsoil (freused)
- Native shrub planting - with 300mm topsoil (freused)
- Ornamental planting - with 450mm topsoil (freused)
- Amenity grass - with 150mm topsoil (freused)
- Long mown grass - with 150mm topsoil (freused)
- Wildflower grass - with 50-100mm topsoil (freused)
- Wildflower grass suitable for wet soils - to improve existing grassland area
- Hedgerow to Forest School Boundary (with chestnut pale fence along western edge) - with 300mm topsoil (freused)
- Native Hedgerow - with 300mm topsoil (freused)
- Earthworks (mounds and banks. Refer to engineers details)
- Hibernaculum - Refer to ecologists specification

HARD LANDSCAPE

- Block paving - entrance - concrete block paving in buff / grey mix e.g. Tobermore Tegula 208/172/104 x 173 x 80mm in Cedar or similar
- Block paving - car parking bays - porous concrete block paving to parking bays. To engineers specification
- Asphalt - footpaths, playground and MUGA - with pcc edging
- Asphalt - car park - with pcc half battered kerb
- Self binding gravel - golden self binding gravel with timber edge
- Steps - textured concrete steps with flag tread (with visibility band) and riser, buff colour
- Wide terraced steps - 400mm wide in-situ concrete steps with verticle timber post edge
- Tactile paving - concrete corduroy paving, buff colour.
- Retaining walls - to engineers specification
- Root barrier to protect services. eg ReRoot 1000 by GreenBlue Urban or similar. Exact length to be confirmed by engineers specification

BOUNDARIES & FENCING

- Security fencing with matching vehicle and pedestrian gates - 1.8m high green weld mesh
- Reused flat top metal railings - 1.25m high, dark grey. Legacy item from temporary school site. Approx. 22m of legacy railings
- Flat top metal railings with matching vehicle and pedestrian gates - 1.25m high, dark grey
- Timber picket fence - nursery & reception, 1m high
- MUGA fencing - 1.8m high dark green weld mesh sports fencing with matching pedestrian gate
- Handrail to steps - tubular steel handrails, powder coated dark grey. 1000mm high handrail with mid-rail at 500mm.
- Fencing to bin store - close board timber fence, 1.8m high with matching gates
- Fencing to west side of hedge to Forest School Boundary - Chestnut pale timber fence, 1.2m high with timber gate

FURNITURE

- Picnic benches - timber 'A' frame picnic benches. Refer to FF&E specification
- Benches - refer to FF&E specification
- Cycle Stands - Sheffield cycle stand. Powder coated dark grey. Refer to FF&E specification
- Scooter Racks - doubled side scooter rack (20no. spaces). Powder coated dark blue. Refer to FF&E specification

FUTURE ITEMS (to be provided by DGAT)

- Trim trail
- Spiritual garden
- Embankment slide
- Nature trail features

LIGHTING - refer to Method External Lighting Proposals

- Lighting column location
- Lighting bollard location - 2.4m high
- Lighting bollard location

LEVELS - to be read in conjunction with engineers proposals

- Existing levels
- Proposed levels
- Proposed gradients and direction of fall

Revisions:
 First Issue: 23/05/2017 TH
 A: (24/05/2017) Minor amendments
 B: 15/06/2017) Pedestrian access route amended
 C: (24/06/2017) Various minor amendments
 D: (03/07/2017) Amendments due to drainage comments
 E: (24/07/2017) Proposed spot levels and lighting locations added
 F: (10/08/2017) Existing levels added. Parking bays changed to block paving.

**Landscape Masterplan
 Clearwater School C of E Primary
 School**

Client: Kier
 DRWG No: **P17-0437_04** Sheet No: REV. F
 Stage: Planning
 Drawn by: TH/JH
 Date: 10/08/2017
 Scale: 1:250 @ A0
 (1:500 @ A1)



Rachel Howie
CEO Diocese of Gloucester Academies Trust

rhowie@glosdioc.org.uk
Direct line 01452 835542
Mobile 07399 595033

16 November 2017

Dear Ms Meneaud

DGAT Response to Planning Recommendation

In 2015 Gloucestershire County Council (GCC) approached the Trust to request they consider submitting an application for a Free School, to open as soon as possible, in order to resolve the impending primary school places crisis within the Quedgeley area. The Local Authority (LA) was highly supportive of the Free School bid as this was to address an urgent basic need issue. The LA also put forward the site at Clearwater Drive which was owned by GCC and had been earmarked as a primary school site for at least the last 20 years. The Trust agreed, that if the bid was successful it would endeavour to open the school to meet the Local Authority's preferred timescale of September 2017 despite this timescale being very ambitious. All other successful peer bids proposed to open a year later. As there was already a shortfall of primary places in the area the Trust was asked to admit a bulge reception year in September 2016. The Trust agreed and these children were admitted to Hardwicke Parochial Primary – 30 over the school's PAN.

Clearwater CofE Primary Academy opened its doors September 2017 to a cohort of 30 children in temporary accommodation based on the Hardwicke site. This occurred whilst concurrently applying for planning on the earmarked site. Clearwater Primary, on the temporary site, will only be able to accept a further 30 pupils in the 2018 Reception intake. This would not be ideal for either Clearwater or Hardwicke pupils, however as this position was likely to be of a temporary nature the Trust considers this expansion could be accommodated for a short period.

If planning is not granted the longer term sustainability of the school is in serious doubt. Although the Trust would vigorously appeal a decision not to grant planning permission, this process itself could take a year and the ensuing delays to the build programme would jeopardise the viability of a school that is fulfilling, at the LA's request, a significant shortfall of places. There could be no further expansion on the current temporary site and therefore Clearwater would be unable to admit any new pupils in September 2019.

Information provided by the place planning officer for the Local Authority has confirmed that:

- 2019 Reception intake - forecast 481 for 420 places – 61 short
- 2020 reception intake – forecast 544 for 420 places – 124 short

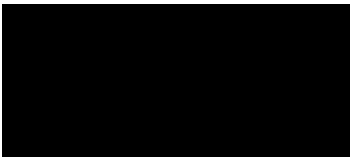
This does not take into account some of the more recent housing which will add to this already existing pressure.

We are now at a critical point in the decision making process. If we do not secure planning for the permanent site it is highly unlikely we would secure additional planning for the temporary site to increase capacity. This would bring into question the sustainability of the school and, with that in mind, we would have to close the school. If this were the case, not only would this exacerbate the on-going critical shortfall of Reception places the Local Authority would need to secure places for those children already attending Clearwater. This would be highly disruptive and distressing for the pupils, families and staff of the school.

We are saddened that the needs of the children in the community of this area of Quedgeley are not being considered in this process and that, by 2020, the data is clearly demonstrating that in excess of 240 children will need to be transported out of Quedgeley, their community, to an educational establishment which may have some places. Due to the pressure in Gloucester, it is highly unlikely to be within the city or surrounding suburbs. The economic impact of this would be considerable but more importantly the impact on those children would be greater still.

To put it simply, if this planning permission is not granted Clearwater Primary would have to close and by 2020 in excess of 240 children aged between 4 and 7 would be being transported out of the area for their schooling.

Yours sincerely,

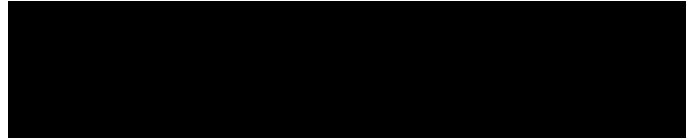


Mrs Rachel Howie



Education & Skills
Funding Agency

Luke Kennedy
Regional Head, Free Schools Capital
Education and Skills Funding Agency
Department for Education
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT



Joann Meneaud
Gloucester City Council
Herbert Warehouse
The Docks
Gloucester
GL1 2EQ

17th November 2017

Dear Ms Meneaud

Re: Proposed Primary School, Land at Clearwater Drive, Quedgeley

I am writing on behalf of the Education and Skills Funding Agency (ESFA) in association with the application for the development of a state funded primary school at Clearwater Drive, Quedgeley (reference 17/00729/FUL).

We have been kept informed of developments by the appointed contractor due to deliver this important infrastructure project as the application has progressed from pre-application discussions to negotiations during the formal determination period. To date, we have been made aware that although there have been some delays, the application has been broadly supported, subject to a number of technical matters being resolved.

However, we understand that, following a letter issued on 14 November, this position has changed and the City Council is now minded to recommend refusal when the application is due to be reported to planning committee on 5 December. We understand this is the first time the appointed team has been made aware of this altered position. Evidently, it is disappointing to learn of this recommendation, particularly at this late stage in proceedings.

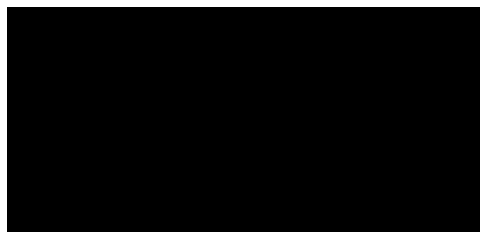
We understand that the planning consultant managing the application has written to you in detail on this matter. We are surprised to learn that the recommendation is based on the location of outside play areas, despite the City Council's Environmental Health Officer confirming no objection on noise grounds. We also understand this is on the basis that there will be a loss of open space, despite the fact the site is allocated for a much-needed school and the City Council's own Open Space Strategy confirms that the site is reserved for future development.

Given the strong policy support for the provision of state funded school, as confirmed by the NPPF, I am writing to ask that the City Council will reconsider the current recommendation. The strong policy support at the national level, together with a clear indication at the local level that the site will be used as a school, advocates that this application should be supported.

Continued delays to this project will exacerbate educational need in the area and will result in issues at the Schools existing temporary site, which is constrained. As it is unlikely that further pupils can be accommodated on this site, this may place considerable pressure on the County Council to identify and allocate sufficient school places for the next academic year.

As such, I feel it is in everyone's interests for the City Council to reconsider the current recommendation and report the scheme to committee as soon as practically possible.

Yours sincerely,



Luke Kennedy

Regional Head
Free Schools Capital
Education and Skills Funding Agency

MP Ref: NM/0343
Email: nathan.mcloughlin@mplanning.co.uk

16 November 2017

Joann Meneaud
Gloucester City Council
VIA EMAIL ONLY

Dear Joann

PLANNING APPLICATION 17/00729/FUL
Land at Clearwater Drive, Quedgeley
Proposed new Primary School

Further to your letter of 14 November and our recent discussions on the matter, set out below is a review of the points that you have made and your position that the application is currently being recommended for refusal. Our team, is disappointed about the content of the letter and the basis by which you propose to refuse the planning application, especially given this is the first time this has been indicated in over 5 months of post submission discussions.

Furthermore, we are equally disappointed by the fact that you had declined to meet with us on a number of occasions, including the previously agreed 15 November at which we could have discussed the letter and the implications for the project.

This letter reviews your letter of 14 November and is accompanied by a response from the Diocese of Gloucester Academies Trust. We understand that the Education and Skills Funding Agency (ESFA) will also be writing to you about this matter.

In turning to the contents of the letter, our position on the various points is as follows:

"Highways"

I note from our conversation on the 14 November that the letter was prepared without sight of the County Highways response, which was issued to you on the 10 November. Given the extensive programme of work we have undertaken with County Highways it would have been prudent to reflect on the County's findings.

This response shows that the County has "No Highway Objection" subject to conditions being imposed. Therefore there are no grounds for refusal.

"Contamination"

Your letter is helpful in confirming the position that this has now been adequately addressed for the purposes of determining the planning application, subject to conditions being imposed on any planning permission.

As a result, there is no contamination concern relating to the site, and therefore no grounds for refusal.

"Drainage"

You will recall that there were extensive discussions on the drainage issue, culminating in a meeting in August, where the matter was settled and that both the County and LLFA have no objection to the scheme. Therefore, there are no grounds for refusal.



"Lighting"

In terms of lighting concerns, it is understood that these relate to the potential floodlighting of the MUGA and sports pitch. The lighting plan submitted with the application makes it clear that there is no lighting of these spaces and as a result, there is no objection to the proposals on lighting grounds (see EHO Email 2 November 2017). Therefore, there are no grounds for refusal.

"Air Quality"

I am extremely concerned about the late involvement of the Environmental Health Officer, who formally responded to the application for the first time on 16 October 2017, some 12 weeks since the application was validated.

I've made the applicant's position on the need for an air quality assessment and the data available to support our position robustly clear and still await a response on this.

"Levels"

We understand that there are some minor discrepancies between certain plans, it would be useful if the references are provided so that these can be specifically addressed and this could have been resolved at the postponed meeting. Given the minor nature of these discrepancies we do not accept that there are any grounds for refusal.

"Elevations"

It is helpful to note that you raise no concern about the design of the building. In terms of materials, your comments about the brick are noted and this could have been discussed at the cancelled meeting. Again this is a minor point of detail that provides no grounds for refusal.

"Physical Impacts from the Building"

It is helpful to note your support for the design of the building and its relationship with neighbouring properties. Between this comment and your comments on elevations, it is clear to conclude that the design and siting of the school building is seen as an appropriate solution.

"Gloucester City Council Revised Deposit Local Plan 2002: Allocation of Site"

You clearly recognise the fact that the site is allocated under Policy CS9 for a new school and then, secondly as public open space, should the site not be needed for a school. The site is needed for a school, as confirmed by the Planning Statement accompanying the application.

"Current use of the Land"

It is not a matter of dispute that the site is open space and is clearly used by local residents as such. Nor do we look to dispute the overall level of open space in the area, as per the Council's Open Space Strategy. However, in the interests of clarity the 2014-19 Open Space Strategy does not identify the site as public open space and does not contribute to the overall supply of open space in the Quedgeley Severn Vale Ward. In fact, the Strategy goes further to note that the site is:

"County council owned land reserved for future development"



In terms of your perceived conflict between the development and the loss of open space, I again point you to Policy CS9 of the 2002 Local Plan, which provides a straight forward way of dealing with this matter. The land is allocated for a school use and then proposed as open space, should the land not be required for a school. Clearly the time has come to use the site for a school and as a result, Policy CS9 takes priority over policy OS7.

We are extremely concerned about the Council's blatant disregard for its own plan, especially in terms of providing the stability to make investment decisions on significant pieces of social infrastructure, such as this. The site is a long-standing school commitment, which has been in place since 1996 and equally continues to do so, through the emerging Gloucester City Local Plan.

In addition, the NPPF (para 72) places "great weight" on the need to create, expand or alter schools. Evidently, this places a high bar for any policy justification put forward when not approving development for schools. Given that local policy allocates the site for a school, which takes priority over policy OS7, given that the Council's open space strategy recognises the future development potential of the site, there appears to be an absence of any such policy that justifies a recommendation for refusal.

The statements in the NPPF are supplemented by the Joint Policy Statement on Schools Development (August 2011), published by DCLG. This is attached for information. This reconfirms that:

"There should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework."

It also confirms that:

"A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority. Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence."

We do not consider that the current use of land results in a conflict with national and local policy guidance. Furthermore, the balance of the County's land (which is outside of the redline boundary of this application and it outside of the applicants control) remains unchanged by this proposal and currently has the benefit of public access.

"Residential Amenity"

Following our telephone conversation yesterday afternoon and my subsequent letter regarding the residential amenity of neighbouring properties, I need to point out that the Council's EHO has no objections to the application in terms of disturbance on neighbouring occupiers.

In terms of MUGA guidance, using the Fields in Trust or the Council's New Housing and Open Space guidance is inappropriate in this context. If this were a MUGA in a new housing development, I would fully agree with your interpretation on standards. However, in this case, it is not, this is a MUGA in the context of a school where the space provided can be used for a number of different sports activities for the children at various intervals during the school day. Before the start and at end of the school day, as has been stated on multiple occasions, there is no third party access to the MUGA, in the same way that there is no third party access to the playing fields and wider school site.

In terms of providing school playing fields (irrespective of whether it is a sports pitch/MUGA/outdoor play area) the proposed layout is the best practical option which meets a whole series of competing requirements.



"Conclusions"

In terms of your conclusions I welcome the fact that you clearly recognise that there is "significant public benefit" of the application which attracts "significant positive weight in the planning balance". This is broadly in line with the NPPF and other national guidance that places "great weight" on the need to create schools and a "presumption in favour of" applications for state funded schools.

However, the relative weight attached to loss of open space and alleged impact on neighbouring properties is overstated and does not reflect the requirements of the 2002 Local Plan.

Furthermore, your consideration of the balance fails to consider the impact not providing the school will have on the provision of places in this part of Gloucester. As set out at the start of the project, there is an urgent need for this school to be provided as there is a serious capacity issue for school places in Quedgeley that needs to be addressed. To help explain the matters, the attached summary from the Diocese of Gloucester Academies Trust shows that by 2020 a minimum of 240 children will not have school places in Quedgeley and will need to be transported to other locations, which given the overall capacity issues in Gloucester as a whole, will see children schooled outside of the City and the communities in which they live.

Therefore, the need for this school, which carries significant weight in planning terms, should result in the scheme being recommended for approval.

Overall Summary

To conclude, the above analysis of the issues raised in your letter shows that there is no planning policy basis for refusing the planning application, nor is there any technical basis for doing so, once the responses of statutory and non-statutory consultees are taken into account, summarised as follows:

Issue	Evidence	Position
Highways	GCC Response	No objection
Contamination	City Consultant/EA	No objection
Drainage	GCC and LLFA	No objection
Lighting	EHO Response	No objection
Ecology	GCC Ecologist and FoD Ecologist (verbally reported)	No objection
Air Quality	EHO	To be resolved
Levels	Case Officer	Minor amendments required to plans
Elevational Design of the Building	Case Officer	No objection
Physical Impacts from the building	Case Officer	No objection
Planning Policy	Allocated site for a school	No objection
Loss of open space	Allocated site for a school	No basis for objection
Residential Amenity	EHO Response	No objection

As can be seen from the above, aside from the need to amend the plans and resolve the EHO position on air quality, the evidence available shows that there is no policy basis for the application to be recommended for refusal.

Therefore, I would like you to reconsider your position so that this important infrastructure project can be delivered.

Yours sincerely

**Nathan McLoughlin BSc (Hons) DipTP MRTPI
Director**

Encs

cc

Clr Paul James - paul.james@gloucester.gov.uk
Clr Gordon Taylor - gordon.taylor@gloucester.gov.uk
Clr Andrew Lewis - andrew.lewis@gloucester.gov.uk
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Luke Kennedy – Regional Head ESFA - Luke.Kennedy@education.gov.uk
Mella McMahon – Gloucester City Council - Mella.Mcmahon@gloucester.gov.uk
Richard Graham MP - richard.graham.mp@parliament.uk
Chris Hedges – ESFA – chris.hedges@education.gov.uk
Tyrone Vincent – Kier – tyrone.vincent@kier.co.uk
Kerry Brimfield –DGAT - KBrimfield@glosdioc.org.uk
Rachel Heywood – Gleeds – Rachel.heywood@gleeds.co.uk

Highways Development Management

Shire Hall
Gloucester
GL1 2TH

Joann Meneaud
Gloucester City Council
City Planning & Technical
Services Department
Herbert Warehouse The Docks
Gloucester
GL1 2EQ

email: dave.simmons@gloucestershire.gov.uk

Please ask for: David Simmons

Our Ref: G/2017/038950

Your Ref: 17/00729/FUL

Date: 21 November 2017

Dear Joann Meneaud,

**TOWN AND COUNTRY PLANNING ACT 1990
HIGHWAY RECOMMENDATION**

LOCATION: Clearwater Primary School Clearwater Drive Quedgeley Gloucester

PROPOSED: Erection of a Primary School and associated infrastructure with car park and pedestrian and vehicular access from Clearwater Drive and pedestrian access to Aspen Drive.

I refer to the above planning application received on the 27th July 2017 with submitted details;

SK028 Rev P2 – Car Park drop off proposals,
PL01 Rev P2 - Site Location Plan,
PL07 Rev P2 – Site Block Plan,
Design & Access Statement,
P17_0437_04 Rev F – Landscape Masterplan,
Planning Statement,
Transport Assessment June 2017 and July 2017,
Travel Plan June 2017,
Parking Arrangement July 2017,
20171026 Severnvale Drive Accident Data,
TA Review V1 GCC Comments – Jubb Response,
SK029 Rev P1 – Vehicle Swept Path Analysis,
3520-WAL Severnvale Drive ATC,
Councillor Hannah Norman Objection Letter,
Jubb Response to Cllr Hannah Norman Objection Letter.

Scale of Proposal:

The proposal is for the construction of a new 2FE 420 place primary school for 4-11 year old children and a 42 place nursery for children between 2 and 3 years of age. The school provides 19 teaching posts and 29 supporting roles that would see 32.5 Full Time Equivalent positions.

It is envisaged that pupils will be drawn from similar locations of pupils currently enrolled at the neighbouring primary schools of Meadowside Primary School, Field Court junior Academy, Beech Green Primary School and Hardwick Parochial School.

Hours of Operation:

School teaching hours will be between 09:00 and 15:30. A breakfast club will be available from 08:00 with 30 pupils estimated to attend. After school clubs will run until 18:00 with 50 pupils estimated to attend. The nursery will offer three different sessions (08:00 to 18:00, 09:00 to 12:00 and 13:00 to 16:00).

Student Catchment Areas:

The TA has developed a catchment area for the proposed school based on the geographical distribution of pupils at other primary schools in the surrounding areas. The analysis of the location of pupils at other schools identifies a main catchment area for each school of up to 1km (from which most pupils are assumed to originate) and a secondary catchment area of up to 2km (from which a smaller proportion of pupils are assumed to originate). No details of the proportions of pupils within these catchments have been provided. The catchment area developed for the proposed school suggests all pupils will be within 1km of the site. Arguably the school will have a greater catchment area than this, as a new school may be more attractive than existing schools and attract an intake beyond 1km. The potential implication of a greater catchment area will be discussed as part of the Development Trip Generation.

Site Access:

A priority junction onto Clearwater Drive is proposed. This is shown on Jubb Drawing No. SK021 Rev P1. A Stage 1 Road Safety Audit (RSA) will be required, although this could be secured by planning condition given the relatively standard junction design, with opportunities to amend the design within public highway/Applicant land if issues are raised by the RSA.

Visibility splays of 2.4m x 54m are proposed, commensurate with the requirements in Manual for Gloucestershire Streets for a road with a 30mph speed limit. The TA makes reference to 85th percentile vehicle speeds recorded by an Automatic Traffic Counter (ATC) on Clearwater Drive. 85th percentile vehicle speeds (7-day) of 25.4mph (40.7kph) eastbound and 25.1mph (40.2kph) westbound are reported. The proposed visibility splays are therefore considered acceptable.

Forward visibility measurements are not shown on the drawing, but from review of the plans it is evident that forward visibility of 57m is achievable.

A 6.5m wide carriageway and 8m corner radii are proposed. Swept Path Analysis (SPA) has been undertaken for numerous vehicle types at the proposed site access to demonstrate that the geometrics are appropriate. The SPA is shown on Jubb Drawing No. SK001 Rev P5, and includes a coach (11.8m long), rigid truck (12.0m long) and fire tender (8.680m long). The SPA shows these vehicles entering the site, navigating the internal car park and exiting the site. The SPA submitted demonstrates that the geometry of the junction and internal site can accommodate

these vehicle types, with in excess of 500mm clearance provided to vertical kerb-line structures, trees and formal parking spaces.

It must be noted that the access design could be regarded as an over design in terms of carriageway width and corner radii. Excessive carriageway widths and corner radii can encourage higher vehicle speeds at the junction and increase the crossing distance for pedestrians. The carriageway of 6.5m for the access road is higher than that on Clearwater Drive (6m). There is potential for the junction to operate with a reduced carriageway width (e.g. 5.5m) and reduced corner radii (e.g. 6m). This can be addressed at the s278 technical stage if it is raised as an issue during the Road Safety Audit. However at the planning stage, GCC has confidence that a safe and suitable access can be achieved.

A further Swept Path Analysis has been undertaken to demonstrate that a coach can pass a large car along Clearwater Drive.

Two separate 'away from carriageway' access points have been proposed to the east and west of the main vehicular access. It is therefore unlikely that pedestrians will access the school via the vehicular access and therefore minimises conflict. Non-school related pedestrians will continue to walk along Clearwater Drive. Tactile Paving can be added to the junction arrangement to provide legibility to vulnerable users. A third pedestrian access is proposed from Eldersfield Close to the east of the site to improve connectivity to the surrounding residential areas. The pedestrian accesses are a suitable 2m in width. The Eldersfield Close pedestrian access links to a combined footway/cycleway that in turn links to the residential area southeast of Severnvale Drive providing a suitable alternative non-car based means of accessing the school.

Landscape Masterplan Drawing P17-0437_04 Rev D had demonstrated a set of gates at the site entrance at the back of the publicly maintainable Highway. The gates appear to have been removed on revised Landscape Masterplan drawing P17-0437_04 Rev F, although this is not entirely clear. Nonetheless, all gates on new developments should be set back a minimum of 5m to ensure that any risk of rear end shunting whilst a vehicle is waiting for the gates to open is minimised. Setting the gates back will ensure a private motorcar can be fully accommodated off of the carriageway whilst the gates open.

A maintenance access is proposed off of Aspen Drive via the provision of a new gated access. The access will only be used at times of maintenance of the playing fields. This will result in a low level of usage. The gate shall remain closed and locked at all other times and shall be secured by way of planning condition.

Parking Provision:

Landscape Masterplan P17-0437_04 Rev F shows a total of 56 parking spaces, of which two spaces are designed as disabled. A parking accumulation study has been undertaken to assess the suitability of the parking provision.

Time Period	Total School Traffic Generation		Parking Accumulation	Adjusted Parking
	In	Out	Initial parking - 0	Initial parking – 24 spaces
07:00-08:00	19	11	8	31
08:00-09:00	103	87	25	48
09:00-10:00	16	21	20	43
10:00-11:00	4	3	21	44
11:00-12:00	8	5	24	47
12:00-13:00	15	18	21	44
13:00-14:00	7	14	14	37
14:00-15:00	14	8	20	43
15:00-16:00	49	64	5	28
16:00-17:00	34	53	-14	9
17:00-18:00	17	26	-23	0
18:00-19:00	13	11	-21	2
Total	300	322	-	-

The parking accumulation is based on initial occupancy, adding arrivals and subtracting departures for each hour to derive a peak parking accumulation in the hour. The peak parking accumulation is stated as 48 spaces within the hour 08:00-09:00; this includes 24 spaces being occupied by the likely number of staff to be attending prior to that time.

Drawing SK028 Rev P2 has demonstrated a drop-off / pick –up area for the Primary school and nursery. The primary school pupil drop off is located close to the internal footways and is positioned as such to allow circulation of other vehicles to be maintained. Although it is positioned across 7 perpendicular spaces, it can be managed so that these spaces are occupied by staff prior to the peak drop-off times. A Car Parking Management scheme can be secured by conditioned to ensure that safe and orderly drop-offs and escort of pupils to classrooms can occur. This will ensure that hap-hazard parking upon the surrounding estate roads is minimised. The nursery drop off has been dedicated to a number of perpendicular spaces as the drop-off time is likely to be greater in duration due to the ages of the children. Directional arrows will be marked upon the car park to ensure orderly circulation and to minimise conflict.

The parking space dimensions adhere to the minimum of 2.4m x 4.8m in length stated within Manual for Gloucestershire Streets. The disabled bays are measured as 3.4m x 4.8m, ideally these should be 3.6m x 4.8m to provide a suitable transfer zone. This can be secured by condition.

Cycle Parking:

Gloucester City Council's adopted cycle parking standards specify a level of provision for 'D1 School/Creche/Day Centre' of 0.15 spaces per employee and 0.15 spaces per student. On a basis of 420 pupils and 38 staff, a minimum cycle parking provision of 69 spaces are required. According to the Landscape Masterplan, a provision of 20 cycle and 60 scooter spaces have been provided within an area that is gated and fenced for security. A further 6 spaces are available for visitors near to the car park. Given the ages of the pupils, the mix of scooter and

cycle spaces are deemed acceptable. The cycle parking will need to be provided in accordance with the specification in Appendix L 'Cycle Facility Guidance' of MfGS. The positioning of the spaces is acceptable; however the spaces should ideally be covered as they are used for long term parking. This can be secured by planning condition.

Site Accessibility:

Section 5 of the Transport Assessment contained a Site Accessibility Audit by pedestrians, cyclists and public transport users.

Pedestrian Accessibility:

The site is well connected with the existing network of footways that serve the surrounding residential areas. The surrounding roads (Clearwater Drive, The Causeway, Miller's Dyke and Severnvale Drive) have footways on both sides of carriageway, are street lit and make provision for crossing movements through uncontrolled crossings at side roads and on the main carriageway. All residential areas within Quedgeley are within the preferred maximum 2km walking distance for commuting journeys/journeys to school specified by the IHT's 'Guidelines for Providing for Journeys on Foot' (2000). There are also numerous local facilities (convenience stores, supermarkets, post office) located within 2km of the site.

Cyclist Accessibility:

The site is located in the vicinity of National Cycle Route 41, which provides an off-road route to Gloucester City Centre. There is also an advisory on-road cycle route on Severnvale Drive. The surrounding roads are subject to a 30mph speed limit and are generally identified as being 'quieter' and requiring a lower level of experience on Gloucestershire County Council's 'Gloucester Cycle Map'. Numerous residential areas are within 5km cycling distance of the site, including Quedgeley, Hardwicke, Kingsway and Lower Tuffley and Central Gloucester. As stated previously, there is also a dedicated off-carriageway cycle link between the residential areas either side of Severnvale Drive which will provide a direct link to the proposed pedestrian access off of Eldersfield Close.

Public Transport Accessibility:

Bus stops are located on Severnvale Drive to the south of the junction with Clearwater Drive (Northbound direction) and Deerhurst Place (Southbound direction). They are located within 200m walk of the centre of the development site, well within the 400m specified distance in the IHT's 'Guidelines for Planning for Public Transport in Development' document. These bus stops provide access to Service 12 (operated by Stagecoach West), which routes between Quedgeley, Hardwicke and Gloucester, operating at a weekday frequency of every 10 minutes. Service 167 (operated by Jackies Coaches) also serves these bus stops, but this is a daily school service to Dursley Rednock School.

Non-Motorised User Report:

A Non-Motorised User (NMU) audit has been undertaken of key routes in the vicinity of the site, included at Appendix E of the TA. The audit focused on four routes: Clearwater Drive, The Causeway and Miller's Dyke, Aspen Drive, and Severnvale Drive.

The audit identified a number of items that would be addressed with as part of highway maintenance programmes (e.g. surface condition, markings). A total of five locations have been identified as being deficient in the provision of tactile paving at dropped kerb locations. The school should be encouraging non-car based travel

for all users and will increase the number of pedestrian movements along the routes where deficiencies were identified. Is it therefore reasonable that the school delivers the provision of tactile paving, this will be secured by way of planning condition.

Summary

The site benefits from a good level of accessibility to walking, cycling, bus and rail modes. Some deficiencies have been identified in regard to the lack of provision of tactile paving at some dropped kerb crossings. In view of the increase in pedestrian flows generated by the proposed development, upgrades at the identified locations are sought (to be directly delivered by the Applicant secured by a planning condition).

Highway Network:

Local Highway Network:

The study area network includes Clearwater Drive, The Causeway, Severnvale Drive, and the approaches to the Severnvale Drive/School Lane roundabout junction. All of these roads are single carriageway roads and subject to 30mph speed limit.

Highway Safety:

The TA provides an analysis of highway safety in the study area based on a review of collision data for the 5-year period between 1 January 2012 and 31 December 2016. This shows that there have been two slight collisions in the study area; one on Clearwater Drive and one on Severnvale Drive. A review of the Detailed Collision Report determined that these incidents were separate with no pattern of incident to suggest any inherent highway safety issue within the vicinity of the development.

Baseline Conditions:

A number of traffic surveys were undertaken in 2017. These include weekday junction turning counts and queue length surveys at the Clearwater Drive/Severnvale Drive, The Causeway/Severnvale Drive, Clearwater Drive/The Causeway priority junctions, and at the Severnvale Drive/Field Drive/School Lane roundabout junction. The TA provides a summary of the mean maximum queue lengths recorded on the approach arms at each of the junctions, but the raw queue length survey data has not been submitted as part of the TA. In view of the available capacity at these junctions, supply of this data is not required. The summary reports that the junctions are currently operating within capacity, with a mean maximum queue of no more than 3 PCUs reported for the approach arms at each junction. This is confirmed by capacity analysis undertaken as part of the 'Existing Performance' sub-section.

A 7-day ATC survey was undertaken on Clearwater Drive. Average two-way traffic flows of around 50 vehicles during the weekday AM peak hour (08:00-09:00) and 35 vehicles during the weekday PM peak hour (17:00-18:00) are reported. 85th percentile vehicle speeds (7-day) of 25.4mph (40.7kph) eastbound and 25.1mph (40.2kph) westbound are reported, below the 30mph speed limit. The raw ATC survey data has been submitted and confirms the 85th Percentile Speeds.

Existing Performance:

Capacity assessment has been undertaken of the surveyed junctions using the 'Junctions 8' software programme.

Whilst this has been updated to 'Junctions 9', the primary features of the programme remain unchanged and we are confident that this is unlikely to affect the reported results. The TA notes that geometric measurements of the junctions has been based on Ordnance Survey (OS) mapping, with adjustments to take account of road markings.

The modelling output reports for the surveyed junctions (reproduced at Appendices H to K of the TA) have been reviewed. The geometry entered into the models is considered satisfactory and robust for assessment purposes.

The traffic flows entered into the model are consistent with those shown on the traffic flow spreadsheets, which are consistent with the traffic survey data. Traffic flows in the model are specified as PCUs rather than vehicles. HGV proportions have not been specified. The software programme manual advises that HGV proportions should be specified regardless of whether traffic flows are entered as vehicles or PCUs. However, from a review of the traffic survey data, HGVs (OGV1, OGV2 and PSVs for modelling purposes) make up a small proportion of movements at each of the junctions and therefore are unlikely to materially affect the results shown in the base models. The base models are considered representative of existing operational conditions and suitable for assessment purposes.

Future Year Baseline Condition:

The Applicant has proposed a future year assessment scenario of 2022. This equates to five years following the registration of the application. Traffic growth factors have been applied to the traffic survey data collected in 2017 to reflect the future traffic conditions. These have been obtained from TEMPro for the 'Gloucester 014' and 'Gloucester 015' Middle Super Output Areas (MSOAs), which covers the study area network. The 'Urban – All Roads' category has been selected and growth factors derived for the AM peak, PM peak and interpeak (to cover the school pick-up period). An average from the two MSOAs has been taken, which shows approximately 7% growth during these periods between 2017 and 2022.

A review of the TEMPro factors has been undertaken based on the selection criteria presented in the TA. This has identified some discrepancies between the growth factors presented in the TA and those derived from TEMPro, although it is acknowledged that this may be a result of changing in housing and employment forecasts in TEMPro since preparation of the TA. These are summarised as follows.

MSOA	AM Peak		School Peak		PM Peak	
	TA	Review	TA	Review	TA	Review
Gloucester 014	1.071	1.076	1.068	1.076	1.065	1.075
Gloucester 015	1.081	1.082	1.075	1.076	1.073	1.078
Average	1.076	1.079	1.072	1.076	1.069	1.077

The TA shows a level of traffic growth of generally 7% between 2017 and 2022. The latest TEMPro forecasts shows a marginally higher level of growth (by less than 1%) but this is unlikely to result in a material change in traffic flows in the study area network in the 2022 Baseline scenario.

It is noted that the TA states there are no specific committed developments in the area that would significantly affect traffic flows on the study area network. This is accepted.

Development Trip Generation:

Parent School Runs:

The mode share associated with pupil travel has been derived from travel surveys undertaken at Meadowside Primary School and Beech Green Primary School. The travel surveys showed walk/cycle/scoot mode shares of 67% and 75% with a car mode share of 33% and 25%. The car mode shares have been averaged to provide the mode share for the proposed primary school. The walk/cycle/scoot mode share averaged 71% and the car mode share was averaged to 29%. The National Travel Survey (NTS) 2015 reports a car driver mode share of 20% for journeys to school of under 1 mile by children aged 5-10 years. The assumption of a 29% mode share is therefore considered robust and is in accordance with what was agreed at the scoping stage. On that basis, the TA calculates that, at full occupation, 122 school pupils and 12 nursery pupils will travel by car and 298 school pupils and 30 nursery pupils will walk/cycle/scoot. The TA does not include potential mode shift associated with measures implemented through the School Travel Plan, this represents a robust assessment.

The TA claims that pupils travelling by car are likely to share journeys with other pupils attending the school/nursery (e.g. with pupils in the same or another family). TRICS has been used to calculate the number of pupils occupying each car, with 28% of vehicle passengers forecast to share the same journeys with other pupils. It is not clear how this has been calculated. This results in an occupancy level of 1.4 pupils per car; GCC has undertaken its own analysis of TRICS and this level of occupancy is considered reasonable.

Staff Travel:

The TA states that the staff mode share has been derived from analysis of the 2011 census for the Gloucester 014 and Gloucester 015 MSOA's. There are some minor discrepancies in the mode shares presented in the TA when compared with GCC's own analysis of the 2011 Census data, but these are unlikely to result in a material change in the traffic generation of staff.

The TA state that most teaching and supporting staff would most likely be recruited locally and therefore the mode shares represent a worst-case scenario. Whilst GCC agrees that support staff are likely to be local to the development, it is unlikely that this would extend to teaching staff, who will typically travel greater distances. This does not affect the assumptions of the assessment. The mode shares have then been applied to the number of Full-Time Equivalent (FTE) employees to calculate the number of staff trips arriving prior to the start of the school day. The actual number of staff employed will be 48; further evidence should be presented with regard to anticipated staff working patterns to confirm that the use of FTE is appropriate, as there may be a number of part-time staff that arrive during the AM peak hour, therefore resulting in a higher number of staff arrivals during this period than has been forecast.

Time Distribution of the Forecast School Traffic:

On the basis of the above, the TA has forecast the following vehicle trips at the start of the school day.

Vehicle Trip Generation – Drop-off Period (spread across 07:00 to 09:00 in the TA – see below)

Type		Arrivals	Departures	Two-Way
Staff		25	0	25
Parents School Runs	Primary School	88	88	176
	Nursery School	9	9	18
Total		122	97	219

The TA has then developed a trip profile for the development. These are split into two categories; nursery school parent runs and staff traffic + primary school parent runs.

Nursery School Parent Runs:

The TA sets out a profile of trips generated by the nursery based on assumptions regarding attendance during the proposed nursery sessions. There is a lack of certainty regarding attendance at these sessions; a robust assessment would therefore have been to consider all trips in each session. However, this will not result in a material change to the total forecasts.

Staff Traffic + Primary School Parent Runs:

For the drop-off period, trips generated by pupils and staff have been spread out across the period 07:00-09:00 to take account of earlier staff arrivals and the breakfast club (commencing at 08:00). Trip profiles in TRICS have been used to establish the proportion of traffic during each hourly period; this results in 17% of arrivals and 12% of departures during the period 07:00-08:00, and 83% of arrivals and 88% of departures during the period 08:00-09:00. Whilst the use of TRICS for this proportional split is considered reasonable, it should be noted that trips will not be spread evenly within each of these periods, rather there will be peaks in demand at around 08:00 (associated with staff arrivals and the breakfast club) and for the drop-off prior to the start of the teaching day (commencing at 09:00).

The TA then calculates the level of traffic generation for the remainder of the 12 hour period (07:00-19:00) based on a profile derived from TRICS. This methodology is questioned as it mixes a first principles approach in the morning with a TRICS calculation in the afternoon. The key assessment periods in the remainder of the day are 15:00-16:00 and 17:00-18:00 and it is considered that the traffic generated during these periods should have been calculated utilising the first principles methodology development earlier in the TA. For example, the information for the drop-off could be used for the pick-up period with consideration to attendance at after-school clubs. However, GCC has undertaken its own review of the information and concludes that this is unlikely to result in a material change in the traffic generation forecasts.

Residual Traffic Impact:

The TA goes onto apply discounts to the traffic generation forecasts to take account of school trips already on the network, as it is envisaged that the opening of a new school will attract a number of pupils from existing oversubscribed schools in the surrounding area. For parent school runs, the TA assumes the following:

- 50% of parent's school runs during the AM will be linked journeys with other purposes. No justification for this has been presented in the TA; this was requested by GCC during scoping discussions. The NTS 2015 reports that 71% of escort trips return home, with only 29% continuing on for other purposes (e.g. work or business, shopping, etc). This would suggest that there would be fewer linked trips than envisaged.
- 10% of parent's school runs are assumed to already be using Clearwater Drive as part of journeys to other schools in the area. There are more direct routes to Severnvale Drive along The Causeway and Millers Dyke for residents who live in that area of Quedgeley and travel to existing schools. This was highlighted by GCC during scoping discussions. To ensure a robust assessment, no existing pass-by trips should be assumed.
- The remaining proportion of traffic is considered to be new to the local network.

The TA assumes that all staff trips will be new to the network and this accepted.

Traffic Distribution:

The TA sets out the traffic distribution for each of the traffic types; new traffic, linked traffic and pass-by traffic. For new traffic, it is assumed that 10% will come from the neighbouring residential estate to the southwest of the site (i.e using The Causeway). The remaining 90% will travel to/from Severnvale Drive and be distributed according to observed turning proportions. Linked traffic has been distributed based on the observed proportions at the Severndale Drive/Clearwater Drive junction. These methods are considered reasonable, the TA also includes a method for pass-by traffic on Clearwater Drive; as discussed, GCC does not consider the assumption that there is existing school traffic on Clearwater Drive to be reasonable.

It is not clear how staff trips have been distributed on the network. All staff traffic should route to/from Severnvale Drive. Beyond this, 2011 Census data for journeys to existing employment in the area should be analysed to establish the likely origin of trips and associated distribution onto the network.

The resulting traffic flow diagrams are included at Appendix F of the TA. These have been reviewed and are consistent with the methodology and calculations set out in the TA.

Network Capacity Tests:

GCC has undertaken a review of the network capacity results presented in the TA. The TA has assessed the capacity of the existing and proposed junctions without and with the proposed development in 2022. The following weekday time periods have been assessed:

- AM Peak Hour (08:00-09:00) – Morning Peak in which Drop-off's occur.
- School Peak Hour (15:00-16:00) – Afternoon School Pick-Up Peak time.
- PM Peak Hour (17:00-18:00) – Evening Peak.

The following junctions have been subject to assessment:

- Clearwater Drive/Severnvale Drive Priority junction;
- The Causeway/Severnvale Drive priority junction;
- Clearwater Drive/The Causeway Priority Junctions;
- Severnvale Drive/Field Drive/School Lane roundabout junction.

In addition, capacity analysis has been undertaken for the proposed site access junction. The traffic flow inputs for each scenario have been reviewed for each junction. These are consistent with the traffic flows presented at Appendix F of the TA. As for the 2017 Base Model, HGV proportions have not been specified but this is unlikely to materially affect the results. The results are discussed in the following sub-sections. Priority junctions and roundabouts are considered to operate within practical capacity at a Ratio of Flow to Capacity (RFC) of 0.85 and below.

Clearwater Drive/Severnvale Drive Priority Junction:

The assessment shows that, without the development, the junction will operate well within practical capacity in all assessment time periods. During the AM and PM peak hours, the maximum RFCs will be on Clearwater Drive (0.19) and Severnvale Drive North (0.10) respectively. During the school peak (PM), the maximum RFC will be on Severnvale Drive North (0.06). The junction will continue to operate well within practical capacity with the proposed development. The maximum RFCs will be on Clearwater Drive (0.41 in the AM, 0.15 in the PM, 0.18 in the school peak); this will result in only a marginal increase in queuing and delay at the junction. The results report queues of no more than one vehicle on all approach arms.

Severnvale Drive/The Causeway Priority Junction:

The assessment shows that, without the development, the junction will operate well within practical capacity in all assessment time periods. The maximum RFCs during the AM and PM peak hours will be on The Causeway (0.33) and Severnvale Drive North (0.21) respectively. Both will have the same RFC (0.12) during the school peak. The junction will continue to operate well within practical capacity with the proposed development. The maximum RFCs will be on The Causeway during the AM peak (0.34) and school peak (0.13), and on Severnvale Drive North during the PM peak (0.21). The increases in RFC will result in only a marginal increase in queuing and delay at the junction. The results report queues of no more than one vehicle on any approach arm.

Clearwater Drive/The Causeway Priority Junction:

The assessment shows that, without the development, the junction will operate well within practical capacity in all assessment time periods. The RFC will not exceed 0.02 during the AM peak hour. The maximum RFCs during the PM and school peak hours will be on Clearwater Drive (0.06 and 0.02 respectively). The junction will continue to operate well within practical capacity with the proposed development. The maximum RFCs will be on Clearwater Drive (0.02 in the AM peak, 0.06 in the PM peak, 0.03 in the school peak); this will result in only a marginal increase in queuing and delay at the junction. The results report queues of no more than one vehicle on any approach arm.

Severnvale Drive/Field Drive/School Lane Roundabout:

The assessment shows that, without the development, the junction will operate well within practical capacity in all assessment time periods. The maximum RFCs during the AM and PM peak hours will be on Severnvale Drive (0.57 and 0.49 respectively), and on School Lane East during the school peak (0.45). The junction will continue to operate well within practical capacity with the proposed development. The maximum RFCs during the AM and PM peak hours will be on Severnvale Drive (0.60 and 0.49 respectively), and on School Lane East during the school peak (0.45). The increases in RFC will result in only a marginal increase in queuing and delay at the junction. The results report queues of no more than two vehicles on any approach arm.

Site Access Junction:

The assessment shows that the proposed site access junction will operate well within capacity during all assessment time periods. The maximum RFC during the AM peak hour will be on Clearwater Drive East (0.17) due

to the right-turn into the site, and will be at the School Access during the PM peak hour (0.04) and school peak (0.11).

Summary:

The analysis has demonstrated that all assessment junctions will operate within capacity with the proposed development. Notwithstanding the concerns regarding the trip generation and distribution methodology, GCC is satisfied that there is sufficient capacity at the assessment junctions to accommodate traffic generated by the proposed development.

Impact of Catchment Area:

It has been suggested that the school will have a wider catchment area during the initial years of opening. The operator has stated that, from experience, places at Church of England Schools are in High demand, meaning pupils will be drawn from a smaller catchment area. Whilst it is possible that a wider catchment area during the initial years of opening could result in a higher car drive mode share than has been assessed, the junctions on the local highway network are shown to operate well within capacity and we are confident they will continue to do so even with a higher car drive mode share. Furthermore, the impact assessments considered full occupation of the school, so if there was a wider catchment in the initial opening years, the levels of pupils would be lower than at full occupation years where the impact is adjudged to be acceptable.

School Travel Plan:

The TA includes a summary of the School Travel Plan (STP), which is a separate document. A review of the STP has been undertaken and comments set out in the following sub-sections. This is an Outline Travel Plan and will need to be updated to a Full Travel Plan once the development is occupied and the baseline travel survey undertaken.

General:

The STP has been developed on the basis of anticipated school profile in terms of hours of operation, and pupil and staffing numbers. Further details are provided with regard to the existing and proposed sustainable transport opportunities, as well as the forecast mode share of pupils and staff, all as set out in the TA.

Aims and Objectives:

The STP has the overall aim *“to provide measures, information and support initiatives that will “promote walking, cycling and public bus services as safer alternative modes of travel and provide students, staff and visitors with an opportunity to reduce the number of car trips to school thereby decreasing the amount of traffic and pollution.”*

A number of objectives have been identified to achieve this aim. These are centred around increasing the proportion of pupils and staff travel by non-car modes, and promotion and raising awareness of these modes. However, there is no disaggregation between pupils, staff, visitors and external travel; this should be considered.

Management:

A Travel Plan Champion (TPC) (usually referred to as a Travel Plan Coordinator, but the roles and responsibilities are the same) will be given the responsibility of implementing the STP. Contact details for this person should be provided to GCC at the earliest possible opportunity. The roles and responsibilities of the TPC have been set out clearly in the STP.

A Working Group will also be established, comprising various members of the school community (governors, staff, parents and pupils); this inclusivity of key stakeholders is welcomed. The STP states that members of the WG will meet regularly, but does not specify the frequency. The WG should preferably meet on a termly basis. If meetings are less frequent (i.e. annually), then the TPC should be responsible for actions which should be undertaken more frequently. This should be set out in the roles and responsibilities of the TPC.

Travel Plan Target:

The STP sets out two categories of targets. The first are short-term targets, which can read more as actions, to be completed prior to occupation and during the first year of occupation.

The second category of targets relate to the 5-year implementation period. These are to achieve a reduction in car usage of 5%, and 75% awareness of the STP. With regard to car usage, it is not clear whether this is in relation to actual car traffic generation, or to achieve 5% mode shift (e.g. from 71% to 66% for pupils). This needs to be clarified and targets for staff and pupil travel should be set out separately. Interim targets within the 5-year period should also be set for a 1 and 3 years after opening. It is also unclear how awareness of the STP will be measured.

The STP states that targets will be developed and agreed in consultation with GCC once the development is constructed and travel demand is understood. This is welcomed.

Measures:

Specific categories of measures are set out to address travel; these are travel within the curriculum, improving information and awareness, walking/cycling, public transport, car share and evening events.

Measures are generally focused on providing information and marketing of sustainable travel options through the curriculum, a travel information webpage, a welcome pack, a dedicated notice board and newsletters. It is important that the information reaches staff and pupils/parents prior to joining the school as there is most opportunity to address travel patterns prior to car use habits being established. Physical measures are also included such as cycle storage, lockers and changing facilities. Shower facilities should be provided for staff.

The promotion of car sharing is limited to the Gloucestershire Car Sharing database. Further measures should be included such as a staff car share database and the provision of an emergency ride home. More informal approaches such as car sharing breakfasts or coffee mornings to introduce those staff interested in car sharing are also recommended. No measures to address external travel (e.g. for school trips) are set out and it is recommended that these are included.

An action plan has been prepared which summarises the measures, timescales for implementation and the person responsible. These seem reasonable.

Monitoring:

A baseline travel survey is proposed at the opening of the new primary school, to be completed annually thereafter annually. A commitment to operate the STP, and therefore travel surveys, for a minimum of ten years should be provided. The survey will be in the format of an approved questionnaire to be issued to both pupils/parents and staff. The form of the questionnaire is considered reasonable. The results of the survey will need to be used to update the STP from its current Outline status to a Full Travel Plan once travel characteristics of the site users is known.

In addition, hands-up surveys will be undertaken, and whilst this is welcomed, the frequency of these surveys is not specified. A detailed traffic survey at the access points is also proposed at the end of the 5-year implementation period. This will provide a useful check against the findings of the questionnaire surveys. Other monitoring includes car parking usage and recording comments from the wider community; this is welcomed.

The STP includes a commitment to prepare an annual monitoring report and this is welcomed. However, the STP does not include a remedial strategy; this is required in the event that the STP is shown to be underachieving and should include measures to help get the STP back on track. These could include personalised travel planning for staff.

STP Conclusion:

The Outline Travel Plan presented represents a good basis for the preparation of the Full Travel Plan following the baseline survey. Comments are made on the content of the document itself, but it is considered that the comments are of such a nature that they can be addressed at the time of preparation of the Full Travel Plan.

Highways Conclusion and Recommendation:

Whilst the review has raised some concerns regarding trip rate methodology, GCC is satisfied that there is sufficient capacity within the network study area to accommodate traffic generated by the proposed development. The car park provision and layout is sufficient to allow parent/guardian drop-off/pick-ups and provides adequate provision for the peak parking demand. The circulatory nature of the car park is legible with a clearly defined drop-off area that will be managed by school staff. Therefore the school has provided adequate provision to minimise prejudicial or ad-hoc parking occurring upon the Local Estate Roads. However, this does not mean that no on-street parking will occur. Given the nature of the development it is expected that some on-street parking may occur, however this will occur with a short spike of activity before quickly returning to normal without adversely affecting the operation and safety of the highway. The school cannot prevent people from parking upon the highway, which does not feature parking restrictions, but they have provided adequate means to reasonably manage the impact. The School Travel Plan is generally acceptable subject to the identified issues being addressed when the full School Travel Plan is submitted.

I recommend that No Highway Objection is raised, subject to the following condition(s);

Condition #1 Construction Method Statement:

No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall:

- i. Specify the type and number of vehicles;
- ii. Provide for the parking of vehicles of site operatives and visitors;
- iii. Provide for the loading and unloading of plant and materials;
- iv. Provide for the storage of plant and materials used in constructing the development;
- v. Provide for wheel washing facilities;
- vi. Specify the intended hours of construction operations;
- vii. Measures to control the emission of dust and dirt during construction
- viii. Details of construction vehicle routing to and from the site.

Reason: - To reduce the potential impact on the public highway and accommodate the efficient delivery of goods and supplies in accordance paragraph 35 of the National Planning Policy Framework.

Note: *The highway authority will seek to recover costs for the extraordinary effects of construction traffic under section 59 of the Highways Act. The applicant/developer is therefore asked to agree a condition survey of the surrounding network prior to works commencing.*

Condition #2 Junction with Clearwater Drive:

Prior to the building being brought into beneficial use the vehicular access shall be laid out and constructed broadly in accordance with the submitted plan drawing no.SK021 Rev P1 with any gates situated at least 5m back from the carriageway edge of the public road and hung so as not to open outwards towards the public highway and with the area of access road within at least 10.0m of the carriageway edge of the public road surfaced in bound material, and shall be maintained thereafter.

Reason: - To minimise hazards and inconvenience for users of the development by ensuring that there is a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians in accordance with Paragraph 35 of the National Planning Policy Framework.

Note ii: *The proposed development will involve works to be carried out on the public highway and the Applicant/Developer is required to enter into a legally binding Highway Works Agreement (including an appropriate bond) with the County Council before commencing those works.*

Note iii: *You are advised to contact Gloucestershire Highways on 08000 514 514 to discuss whether your development will require traffic management measures on the public highway.*

Note iv: *A temporary access to the site during the construction phase can be provided under Section 184 of the Highways Act 1980. The applicant is advised to contact the County Council to discuss before commencing those works.*

Condition #3 Parking and Layout:

The development hereby permitted shall not be occupied until the vehicular parking layout and drop-off facilities have been provided in accordance with the submitted plan drawing no. SK028 Rev P2 and those facilities shall be maintained available for those purposes thereafter.

Reason: - To ensure that a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians is provided in accordance with Paragraph 35 of the NPPF.

Condition #4 Cycle/Scooter Parking:

The development hereby permitted shall not be occupied until the Cycle/Scooter parking has been made available for use in accordance with the submitted plan drawing no. P17-0437_04 Rev D and those facilities shall be maintained thereafter.

Reason: - To ensure that adequate cycle parking is provided, to promote cycle use and to ensure that the opportunities for sustainable transport modes have been taken up in accordance with paragraph 35 of the NPPF.

Condition #5 Cycle/Scooter Shelter:

Details of a Cycle/Scooter shelter shall be submitted to and agreed in writing by the Local Planning Authority. The approved Cycle/Scooter shelter shall then be provided and made available for use on the beneficial opening of the building hereby permitted and maintained available thereafter.

Reason: - To ensure that adequate cycle facilities are provided to promote cycle use and to ensure that the

opportunities for sustainable transport modes have been taken up in accordance with Paragraph 35 of the NPPF.

Condition #6 Crossing Point Improvements:

Details of Tactile Paving to be applied to the crossing points identified on drawing no. W17145_NMU_009 shall be submitted to and agreed in writing with the Local Planning Authority. The approved details shall then be provided prior to the beneficial opening of the development hereby permitted.

Reason: - To ensure priority is given to pedestrian cycle movements and to create a safe and secure layout which minimises conflict between traffic and cyclists or pedestrians in accordance with Paragraph 35 of the NPPF.

Condition #7 Car Parking Management Scheme:

Details of a car park Management scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of the measures to be taken to ensure the safety of pupils, the free flow of traffic at the vehicular accesses and within the car park. The approved car parking Management scheme shall be implemented prior to the building being brought into beneficial use. The car park Management scheme shall be adhered to at all times unless otherwise agreed in writing by the Local Planning Authority.

Reason: - To ensure that ad-hoc or prejudicial parking upon the highway and any associated conflict is minimised in accordance with Section 4 of the NPPF.

Condition #8 Disabled Parking:

Details of disabled parking spaces measuring 3.6m in width by 4.8m in length shall be submitted to and agreed in writing by the Local Planning Authority and the approved disabled parking shall be provided prior to the building being brought into beneficial use.

Reason: - To ensure the needs of people with disabilities have been considered in accordance with Paragraph 35 of the NPPF.

Condition #9 Access Gates:

Notwithstanding the submitted details, any vehicle access gates shall be set a minimum of 5m back from the carriageway edge of the public highway and maintained thereafter.

Reason: - To ensure a safe and secure layout that minimises conflict between traffic and cyclists or pedestrians is provided in accordance with Paragraph 35 of the NPPF.

Condition #10 Pedestrian Accesses:

The pedestrian accesses as shown on drawing no. P17-0437_04 Rev F shall be provided and made available for use on first occupation of the development hereby permitted for beneficial use.

Reason: - To ensure priority is given to pedestrian and cycle movements and to have access to high quality public transport facilities in accordance with Paragraph 35 of the NPPF.

Condition #11 Maintenance Access:

The maintenance access as shown on drawing no. P17-0437_04 Rev F shall not be used for any other purpose other than for maintenance of the playing field and the access gate shall remain closed and locked at all other times.

Reason: -

To ensure that hazards, inconvenience and risks of conflict between users is minimised in accordance with Section 4 of the NPPF.

Condition #12 Travel Plan:

No works shall commence on the development hereby permitted until a Full School Travel Plan has been submitted to and agreed in writing by the Local Planning Authority, setting out;

- i. objectives and targets for promoting sustainable travel,
- ii. appointment and funding of a travel plan coordinator,
- iii. details of an annual monitoring and review process,
- iv. means of funding of the travel plan, and;
- v. an implementation timetable including the responsible body for each action.

The approved Travel Plan shall be implemented in accordance with the details and timetable therein, and shall be continued thereafter, unless otherwise agreed in writing by the Local Planning Authority.

Reason: - To ensure that the opportunities for sustainable transport modes are taken up in accordance with paragraphs 32 and 36 of the National Planning Policy Framework.

Condition #12 School Safety Zone:

A scheme for establishing a School Safety Zone shall be submitted to and approved in writing by the Local Planning Authority with 6 months of the building being brought into beneficial use and the approved scheme shall be implemented in full within 18 months and maintained thereafter.

Reason: - To ensure the safe operation of the surrounding Highway network in the interests of road safety and to minimise conflict between traffic, cyclists or pedestrians in accordance with Paragraph 35 of the NPPF.

Statement of Due Regard

Consideration has been given as to whether any inequality and community impact will be created by the transport and highway impacts of the proposed development. It is considered that no inequality is caused to those people who had previously utilised those sections of the existing transport network that are likely to be impacted on by the proposed development.

It is considered that the following protected groups will not be affected by the transport impacts of the proposed development: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, other groups (such as long term unemployed), social-economically deprived groups, community cohesion, and human rights.

Yours sincerely,
David Simmons
Principal Development Coordinator