

Stroud District Council Examination in Public – Land at Focus School Local Site Allocation PS35 (Matter 6f Berkeley) made on behalf of the land owner, One School Global

1. These representations seek to respond to the specific questions raised by the Inspectors in relation to draft allocation PS35. It is noted that the questions are directed to the Council, however, the draft allocation for PS35 as drafted is undeliverable. In summary, the land owner does not agree to land identified at PS35 as forming part of the playing field and open space strategy for the Sharpness New Settlement (draft allocation PS36).
2. However, it is appropriate for the land owner to reiterate that the site is suitable, available and deliverable for housing beyond the footprint of the existing buildings identified in PS35. The draft allocation makes reference to the site's development capacity of c.70 dwellings. The site's actual capacity is c.140 dwellings which will also enable significant landscaping and Biodiversity Net Gain.

a. What does the term 'considering redevelopment' in this context actually mean? What is actually expected from the development and is this clear in the policy?

3. Land identified at PS35 is owned by One School Global. One School Global has not ever been (nor intends to be in) in discussions with the promoters of Sharpness New Settlement (PS36) or the Council in relation to forming part of that allocation or development.
4. Land at PS35 is a development site that is entirely separate both in landownership terms and physically from PS36. As a site it is capable of coming forward as a development site in its own right and entirely separate from PS36.

b. Can the Council please clarify the site's relationship to the proposed new settlement? Is the development of part of this site for housing justified now?

5. The land included within the redline at draft allocation PS35 is within the ownership of One School Global and is entirely separate from the proposed new settlement (PS36). The sites are physically separate and not being promoted together. The whole of the site (PS35) is capable as coming forward for development for at least 140no. dwellings.
6. One School Global has an agreed strategy for relocating the school to a site with a larger catchment area on the England and Wales border. This will result in the whole school site becoming available for residential development. One School Global is actively working to promote the site for residential development for at least 140 dwellings. The site is suitable, available and deliverable for at least 140 dwellings.

c. Are the existing playing pitches and open space required for the existing community? If so, why are they included in a site allocation for development?

7. The existing playing pitches and open space on the site are for the exclusive use of One School Global. As a strict school policy (globally) facilities at One School Global (worldwide) do not allow the use of their schools' facilities, including sports and recreation space by the wider community. These facilities are strictly for use by One School and never made available by any other educational or community groups.

8. As such the existing playing pitches and open space are not required for the existing community and have never been assessed as contributing to a wider community use, as they have only been used by the Focus School since the school's occupation of the site.
9. The existing playing pitches and opens space are only required by Focus School and not the wider community. As described it is the intention of the school to relocate. This renders the playing pitches and open space as redundant for any wider use, given that they have never been used for this purpose, and the landowner does not agree to the inclusion of their land in relation to the Sharpness New Settlement (PS36) for that purpose.
10. The inclusion of the site to provide playing fields and enhancing recreation for draft allocation PS36 has been done so without the consent or agreement of the land owner.

d. Does the evidence robustly demonstrate that the existing playing pitches and open space are required for the new settlement? Can the Council point us to this evidence please?

11. The land at Focus School is not available for this purpose.

e. The site is not adjacent to the site allocation for the new settlement, so are the facilities in the best location? How has this been determined? How will future residents access the facilities? If the facilities are required for the new settlement, why is the land not proposed to be allocated as part of that site?

12. The full extent of the site is capable for coming forward for residential development (c.140 dwellings) with the provision of sufficient public open space and Biodiversity Net Gain to serve that number of residential units.
13. No evidence has been provided to the land owner of any need for the site to provide for facilities to serve the Sharpness New Settlement. Furthermore, the land owner does not intend to agree to the use of its land for facilities that serve the Sharpness New Settlement.
14. The area of land included as allocation PS35 is a logical development parcel on that site. There is no connectivity or relationship between PS35 and PS36. Indeed, PS36 is significantly physically separate from land at PS35 without any proposed connectivity. Regardless of the allocations of both sites, neither are connected nor proposed to be with significant existing separations by the B4006 and Station Road. There is no connection proposed, nor any existing.

f. The supporting text to the policy advises that development should be restricted to the footprint of the school buildings and associated brownfield land, but this is not set out in the policy. Should it be and if so is this approach justified?

15. The approach of restricting the developable area of the site to the footprint of the existing buildings is not justified. The site is capable of accommodating a significantly greater amount of development without compromising the landscape, Biodiversity Net Gain, amenity or access.

g. The policy title is incorrect as it refers to a different site so can the Council amend this?

16. For the avoidance of doubt the land should be described as One School Global [Bristol Campus].

h. What 'community uses' are envisaged within the site, are they justified and do they need to be expressly set out in the policy?

17. Please refer to previous responses making clear that the site is not available for use as part of allocation PS36.

i. The supporting text also refers to enhancing existing landscaping and planting for local biodiversity. Does this need to be set out in the policy or is this covered by other Plan policies? What would be actually required for the site in this context?

18. The development of the site to reach its potential of c.140 dwellings can deliver enhanced landscaping and planting to achieve Biodiversity Net Gain and visual enclosure of the site.

j. Some of the representations raise other concerns relating to the development of the site, including legal restrictions, the impact of additional traffic and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?

19. The site is deliverable. It is not the subject of any legal restrictions or covenants.
20. The site is well served by the highway network and the use of the site as a school with 139 students, and teaching and ancillary staff in addition, does not represent any unacceptable impact to the highway network. The residential development of the site will not materially increase traffic to an unacceptable level. There is no evidence that this would reasonably be the case so as to cause an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
21. The site is accessible by bus routes (62 and 207) to Dursley and Berkeley, both of which are local centres with a full range of services. The development of the site for housing will significantly improve the sustainability of both bus routes and increase the viability and vitality of the local service centres and facilities, including a number of local businesses such as restaurants, cafes, pet grooming, public houses and local food stores.
22. The fact that the site is currently used as a school with 139 students plus staff demonstrates that the site is capable of accommodating residential development. The site is well served by the highway network, which is capable of accommodating the school and all associated traffic. A residential development on the site would not materially worsen the situation, particularly so as to be severe. Furthermore the development of the site will enhance nearby local services and improve the viability of the existing bus routes.

Suggested amendment to Local Sites Allocation Policy PS35

Land at Focus School, Wanswell, as identified on the policies map is allocated for ~~partial~~ redevelopment comprising up to ~~70~~ 140 dwellings and ~~community use~~ landscaping and open space. ~~including the retention and enhancement of existing playing pitches and open space. Particular issues to address will include considering redevelopment within the context of PS36 new settlement to ensure that retained open space meets the specific recreation needs of the wider new community. A masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.~~

Closing

23. Representations have been made to the Council by the land owner setting out its position, most recently in response to the Local Site Allocation Deliverability Assessment (October 2022). As part of this assessment the land owner made clear that the site should come forward for the development of 140 dwellings