



Helen Donnelly
Senior Planning Officer
Cotswold District Council

25 September 2017

Dear Helen

I contacted CDC a week ago when we saw a newspaper report that the Local Plan (including the Chesterton Development) had been recommended for approval and that there were to be final hearings with an Inspector. I was surprised to find out that we had not been included. We have attended some CDC meetings and have responded to information requests but as we were unaware of it, we had not responded to the specific consultation which generated the hearings. Given the location and nature of this institution I would have hoped a consultation on an issue of this magnitude would have engaged directly with us. We may also have been at fault in not spotting something and if that is the case I'd like to apologise and request special consideration for inclusion in the process at this late stage.

In essence, I feel that we have not had adequate opportunity to put the case for the College, which is the main provider of 16-18 education both in Cirencester but also in the South Cotswold and Mid Cotswold sub-regions. This is a key local constituency and vital to the future economic health in the area. In addition we are one of the largest employers in the town and are located adjacent to the site.

I have outlined our primary areas of concern below with reference to the document **Inspector's Matters, Issues and Questions for Examination**.

Matter 1, Issue 1.2 p3

We represent approximately 1000 16-18 year olds from the South Cotswolds and Mid Cotswolds including nearly 400 from Cirencester itself. We don't feel that there has been the proactive engagement with our students or ourselves. We would like the opportunity to address this.

Matter 5 point 54 p 14 and point 67 page 15

Clearly the proposed development will generate additional demand for 6th form education. The planning estimate is that the development will generate 264 places at the 2 local secondary schools with the majority going to Deer Park. That represents an additional 53 students per year group. We recruit 67% of each year group from Deer Park to the College for year 12 and 13 which represents 36 students. Each student will do on average 3.5 A Levels or equivalent which equates to 124 additional classroom places per year or around 220 over 2 years. Those students will also require pastoral support and access to the same resources enjoyed by existing students.

Our funding is exactly the same as for 6th forms in School. We receive no in-year funding for growth and no capital funding except via bids to national Condition Improvement Funds. So we will need to (and would want to) accommodate more young people during the growth phase of the new development but will struggle to provide teachers for extra sets. In addition we will need some new classroom space to accommodate numbers. This is will be most pressing in areas where we are already full which includes some STEM subjects, Digital Media and Web-based design courses, all of which are priorities for Gloucestershire LEP. Essentially, we will need some additional larger learning spaces to accommodate increased group sizes. Finally, our student's top priority is for additional mixed independent learning/social spaces.

The estimates by GCC that have been used in the plan are misleading. If we were a combined 11-18 school, sixth form numbers would have been included but because Cirencester separated the 6th form into a College (in 1991) their needs have been excluded. The references to apprentices is very welcome but the vast majority of our students are studying level 3 classroom-based courses, particularly A Level.

We would like to see a recommendation for 16-18 students to be given the same weighting as 5-11 and 11-16 pupils with provision required (via Section 106 monies) for some additional accommodation and (if allowable) transitional revenue funding for some additional staff. I would like to stress that we are not seeking to try to get particularly expensive specialist accommodation, simply the equivalent of 2-3 larger classrooms to accommodate increased numbers. We would resolve the other issues by moving courses around.

Matter 5 point 55 p14 and point 67 p15

We have 2 concerns about the traffic management proposals for the Stroud Road- Tetbury Road Roundabout area.

Currently this area is heavily impacted by traffic from 8.20-9.15 am and to a lesser extend 3.45-4.30 pm. We have played a major part in reducing, congestion, car journeys and pollution by subsidising a fleet of 30 coaches to take students to and from the College.

While we are unconvinced that traffic lights on the roundabout will help traffic flow, our main concern is the proposal for a right turn out of Chesterton Lane with associated traffic lights on the dual carriage way. This proposal is to facilitate an estimated 70 cars an hour and therefore a hugely expensive intervention per journey. The impact on other traffic is likely to be immense and disproportionate. The report by the developer's consultants (i-transport) is extremely optimistic about the impact of these traffic lights on queues at peak times. We do not feel that it is credible. We have considerable experience of managing the traffic entering our site and the knock on impact on the roads and also upon the effect of any hold-up at or near the roundabout. We predict that queues which currently reach the hospital roundabout will back up towards the Love-Lane/ Fire Station Roundabout and to the Tetbury/Malmesbury junction on the A429 and beyond the RAU on the Stroud Road. This will lead to grid-lock and significantly add to our student's journeys and to pollution at this point. By extension, it may also impact on student drop out by unnecessarily extending what are already long bus journeys, particularly for those from the North and Mid Cotswold Sub-Areas.

We do not understand why the relatively few cars emerging from Chesterton Lane cannot turn left and go around the roundabout at present. The proposed expense and disruption for just over 1 car per minute also seem out of kilter with the parsimonious treatment of pedestrians and cyclists at this point. We ask that this is reconsidered.

We also have safety concerns regarding pedestrian crossings from the Chesterton side of the road to the Stroud Road area. The report makes it clear that the Council have safety concerns about subways (which we share) and then goes on to recommend them as suitable for School Pupils and College Students. There is also a

proposed toucan crossing across the by-pass. We are concerned that (increased) numbers of pedestrians and frustrated car-drivers are likely to make safety worse, not better. Our view has always been that a foot and cycle bridge (similar to that built to enable pedestrian, including disabled, access to Tesco over the A 417 Swindon Road) would be the safest and best solution. This surely would be of much greater benefit generally than the Chesterton Lane traffic lights. I have not had time today to ask the view of the RAU and Deer Park School but I would be surprised if they did not also prefer a footbridge from the safety point of view for their students/pupils. We ask that this is reconsidered.

Matter 6 issue 6.9 points 91-95 and 96 p 17

In addition to the points above we feel that the needs of 16-18 students wishing to access the College from across the South Cotswold sub-region have not been considered. At no point has there been a direct discussion with the College about the impact of these developments. The College provides a much wider curriculum than the other 11-18 providers in this area. In addition to a considerably wider choice of A Levels than small school sixth forms we provide apprenticeships, vocational courses and will offer some T Levels. Students in rural locations should have the right to access high quality, appropriate provision. Local schools cannot therefore meet their needs. New housing approvals across this sub-area have never considered 16-18 transport requirements or the knock-on pressure on places at this College. This proposal also ignores these infrastructure needs. Around 850 students a day travel to the College each day from this sub-area.

We request that Developers and Local Authorities in the South Cotswold Sub Area are required to consult the College about the impact of increased numbers of 16-18 students and (including these proposals) make a contribution towards ensuring that students in new housing developments can access the education they require.

Matter 7 issue 7.6 points 114-117 and 118 p 19

In addition to the points above we feel that the needs of 16-18 students wishing to access the College from across the Mid Cotswold sub-region have not been considered. At no point has there been a direct discussion with the College about the impact of these developments. The College provides a much wider curriculum than the other 11-18 providers in this area. In addition to a considerably wider choice of A Levels than small school sixth forms we provide apprenticeships, vocational courses and will offer some T Levels. Students in rural areas should have the right to access high quality, appropriate provision. New housing approvals across this area have never considered their transport requirements or the knock-on pressure on places at this College. This proposal also ignores these infrastructure needs. Around 150 students a day currently travel from this area to the College but numbers are rising steadily year on year.

We request that Developers and Local Authorities in the Mid-Cotswold Sub Area are required to consult the College about the impact of increased numbers of 16-18 students and (including these proposals) make a contribution towards ensuring that student sin new housing developments can access the education they require.

In summary

- We believe the planners need to reconsider the right turn traffic lights out of Chesterton Lane and to replace the subway/toucan crossing with a safer and less disruptive footbridge.
- We believe that these developments, particularly that at Chesterton, will lead to significant extra 16-18 demand for places at Cirencester College. In most respects we will adapt to cope with this but we are short of space and will need funding to provide some additional accommodation.
- We feel that consultation with organisations like Cirencester College should be direct in order to ensure that the needs of our distinct constituency (16-18 year olds) are considered. It may also be the case that discussion could have resulted in more joint-use of existing facilities.

I hope this provides enough information to enable you to decide whether to allow us to participate. Please let me know if you require further detail on any point.

Yours sincerely

Jim Grant
Principal