

The attached documents challenge the claimed "need" for Gloucestershire County Council's sudden, unplanned scheme to site a further Secondary School in sensitive SouthWest Cheltenham (necessarily eroding NPPF 'Valued Landscape').

The most recent document is 'A0.2' (attached), which finally sets out the key data (extracted via FoI, but only following the intervention of the Information Commissioner), namely:
data on current pupil origin within Cheltenham.

Table T1 confirms that far from the need being located in the landscape-sensitive South of the town, it is the North and West which is underprovided and is transporting large numbers of pupils to Secondary schools in Bishops Cleeve and Winchcombe, nearby settlements which are themselves expanding.

GCC has retreated from claiming that Secondary need is originating from the South of town; yet it has shortlisted only sites in the SouthWest, essentially an unjust 'fields-grab' (evading the recently concluded Examination in Public of Gloucestershire's 'Joint Core Strategy', which ruled on major Green Belt and landscape assaults).

It is only GCC's (April-revised) FAQ which argues for a Southern location, on the dubious basis that the (generally more desirable) southern Primaries (which it claims "feed" the 'better rated' southern Secondaries) draw their pupils from a "2 miles" radius, a craftily excessive formulation which would sanction the drawing of pupils from central and northern districts of town.
It is not easy crossing Cheltenham at peak times, due to our unimproved historic road network.

The unbelievably urgent ("September 2019") requirement date initially claimed for this further extra Secondary (which succeeded in getting the scheme slipped quickly into Cheltenham's emerging Local Plan draft) now appears to be drifting/phasing out.
At the same time, the Local Plan now appears to have stalled, possibly due to weight of Objections.

This secretive scheme continues to evade proper planning and scrutiny of evidence.
It unwisely, unnecessarily and surreptitiously threatens 'valued landscape', which has recently been exempted from development threat after lengthy 'due process' of planning.

By wasting time with public silence and non-disclosure, GCC is closing the door on many wiser alternatives, e.g. accelerating the delivery of the approved (developer-funded) additional Secondary school in the urban extension at NorthWest Cheltenham.

Deliberately creating an "emergency" 'bind' does not produce the 'very special circumstances' needed to warrant yet further erosion of Gloucestershire's Green Belt (already JCS-reduced by the highest percentage anywhere).

I have been able to draw some conclusions (initially just for Cheltenham) from the data released by GCC Education on 25 May 2018, nine months after my initial FoI request (on 23 August 2017) and only following complaint to the Information Commissioner's Office (ICO).

The datasets (**D1** to **D3**) eventually released by GCC (Gloucestershire County Council) comprise the following. (The summary Tables (T1 to T3), which I have generated from the above data, are explained in red.)

- D1** a set of Excel spreadsheets, (one for each of 2014 to 2017), giving the number of pupils in each of Gloucestershire's State secondary schools, broken down by County electoral 'division' /ward of residence; the year 2017 data has been narrowed down to focus initially just on Cheltenham's Secondaries, to produce **Table T1**, attached;
- D2** a zipped folder (called '**Secondary Forecast 2018**') containing 40 pdf files, one for each of Gloucestershire's State secondaries;
I have selected data for the 10 secondaries most relevant to Cheltenham parents into a single spreadsheet as **Table T2**, attached;
it shows the average number coming into each of the 10 Cheltenham Secondaries from each of Cheltenham's Primaries, arranged into the town's five Primary school 'Groups' (SouthEast, South, West, NorthWest, and NorthEast);
the table also shows each Secondary's forecast total growth from 2017/18 to 2024/25;
- D3** a zipped folder (called '**Forecast Transfer Total Report**') containing 39 pdf files, one for each of Gloucestershire's State secondaries, giving the number of pupils transferred from each of Gloucestershire's Primary schools, in each of the past five years;
I have condensed this data to produce **Table T3**, attached, which shows the September 2017 pupil Allocations from Cheltenham Primaries (State and Independent) into Cheltenham's and its surrounding Secondaries (including Gloucester's four Grammars);

Preliminary Conclusions for Cheltenham Secondary provision

drawn principally from **Table T1** '**Cheltenham Secondary Pupils, by town locality, 2017 (pre- JCS expansion)**', (using data from Gloucestershire County Council's **FoI Release 6481604** on 25 May 2018).

Table T1 prints off for study, as a single page, from the attached PDF.

Some detailed conclusions are:

- 1 Bournside is serving numerous Areas (call them 'wards' or 'divisions', whatever);
- 2 Balcarras, although not much smaller, is mainly serving its own locality;
- 3 it is the North side of Cheltenham which already has a huge deficit of provision, sending 600 pupils to the Cleeve and Winchcombe secondaries; yet Cheltenham's portion attending these two 'out of town' schools may have to be cut back as housing development proceeds around Bishops Cleeve;
- 4 Pittville School (at 673) is too small; yet GCC Education allowed it to dispose of an adjoining playing-field, for housing, about two years ago;
- 5 Cheltenham sends a total of 714 to Gloucester's four Grammars, which will have to be cut back due to Gloucester's dramatic JCS expansion, forthcoming; should Pate's Grammar therefore be expanding ?
- 6 an urban extension of 1500 houses at Brockworth (southwest of Cheltenham, off the A46) was permitted by Tewkesbury before the JCS was concluded; the adjacent Henley Bank secondary school is small, and a larger number from Brockworth travel to Chosen Hill secondary in Churchdown;

Choosing (inexplicably) to place a third Secondary school in the South of Cheltenham, leaving just two (smaller) secondaries in the North of town, and placing that extra school so close to Bournside on its southern side, will largely confiscate Bournside's southern (e.g. Leckhampton) catchment.

The unacknowledged consequence (indeed aim) of this extra Southern school is to oblige Bournside to draw more pupils across from the North and West of town, especially when there comes to be less capacity for Cheltenham residents at Chosen Hill, Cleeve and Winchcombe schools. This increased cross-town travel is not sustainable on Cheltenham's exceptionally deficient road network.

The entire 'equation' of Secondary places provision, across Gloucestershire's District boundaries, and in the context of the recently Approved JCS urban extensions, is **overdue for being properly set out** in Education 'Strategy Reports' (i.e. not merely for Cheltenham). Only thus can 'travel to school' distance be optimised. This belated and reluctant FoI Release now enables county-wide 'travel to school' summary tables to be assembled, similar to the concise Tables for Cheltenham, attached .

It has however taken a critical 9 months of persistent submission to force this data out of GCC.

If GCC thereby succeeds in getting this mis-sited and unevidenced South Cheltenham school too far progressed to be stopped/reviewed, and even gives itself the planning permission (on Valued Landscape and/or Green Belt), then there can be no environmental compensation.

(GCC has already stated that the planning application for this new school will be determined by its own Planning Committee.)

Retribution, and compensation to local residents' environmental/amenity groups, should however be substantial and punitive for GCC's scheming evasion. The South Cheltenham secondary school 'project' was documented in early 2017 but kept unpublished, and during the JCS Examination (whose final evidence sessions were in July 2017) GCC craftily did not mention this alleged "need" for substantial additional hectares of greenfield, neither as an Infrastructure issue nor as a demand upon Gloucestershire's heavily eroded Green Belt.

The attached data shows that there is no pent-up demand arising in South Cheltenham, but there is such demand from the North (which is currently displaced onto Cleeve School and also Winchcombe secondary schools).

The limited justification which GCC repeats for a South Cheltenham location cites merely 'Year 7' forecasts, But these figures can be no more than guesstimates, with no basis in fact; and they can easily be skewed to 'justify' a Southern school, (which in truth is primarily driven by parental preference to send children to the 'better' southern area, regardless of harm to sensitive landscape).

The only reason for selecting the constrained and most sensitive South is:

- 1 GCC thinks it can get cheap land at the expense of 'Valued Landscape' countryside; and
- 2 parents town-wide (and further afield) will 'prefer' to drive pupils into a 'better' area.

Has the August 2017 FoI Request been satisfied ?

The spreadsheet sent to GCC for completion last August can now be assembled.

However, the active public dialogue about the wisdom or otherwise of the proposed Southern location has been unjustly obstructed by GCC's refusal to give these figures for pupil origin (until arguably too late to be able to question their choice).

This locational analysis still needs to be done focusing on the Gloucester Secondaries (and for the rest of Gloucestershire), in order to ensure that any additional Secondary schools are being located close to where the additional Housing demand is truly arising.

GCC Education's 'Strategic Review of Secondary Need in Gloucester', promised for Spring 2018, has still not been published.

Important decisions have already been made, e.g. Cheltenham BC's very late decision to include the South Cheltenham school site into the Submission Version of the Cheltenham Local Plan. That decision was made without this key evidence of pupil 'origins' being available or summarised to support that locational choice. GCC Full Council also made a decision to fund this much-queried school just prior to the above CBC decision, again without any of the obviously crucial evidence being released to either councillors or the public.

Attached spreadsheets:

T1-CheltAreas-SecPupils-2017_v01.pdf

T2-CheltSec-Feeders_v01.pdf

T3-Prim-Sec Transfers-2017_v01.pdf

Cheltenham Secondary Pupils, by town locality, 2017 (pre- JCS expansion), from Fol																T1
	cols = Sec. School rows = GCC area ('division')	Balcarras	Bournside	All Saints'	Pittville	Henley Bank	Chosen Hill	Tewkesbury	Cleeve	Winchcombe	Pate's	High School Girls	Ribston Hall	Sir Thomas Rich's	The Crypt	Grand Total
		SE	SW	NW	N	SW	W	NW	N	NE						
NE	All Saints & Oakley	39	38	49	175				88	43	25	26	9	18	12	529
	<i>All Saints & O %</i>				33				17		Gloucester grammars:				65	
E	Battledown & Charlton King	793	11	8	46				28	10	45	23	<5	38	7	1017
	<i>Battledown & CK %</i>	78			5										68	
SE	Charlton Park & College	301	73	<5	13		<5		7	<5	54	23	6	33	13	534
	<i>Charlton Park & C %</i>	56	14												75	
S	Lansdown & Park	9	127	7	<5			<5	<5		56	37	13	38	24	328
	<i>Lansdown & Park %</i>	3	39												112	
S	Leckhampton & Warden Hill	70	419	<5	<5		9	<5	<5		42	43	14	52	22	691
	<i>Leckhampton & WH %</i>	10	61												131	
SW	Benhall & Up Hatherley	7	488	7	6	<5	64		<5	<5	27	23	13	42	14	704
	<i>Benhall & UH %</i>		69				9								92	
W	St Mark's & St. Peter's	16	232	177	62	<5	8	<5	36	<5	19	11	11	17	10	615
	<i>Sts. Mark & Peter %</i>		38	29											49	
W	Hesters Way & Springbank	13	132	543	89	<5	25	10	50	<5	28	12	8	11	8	941
	<i>Hesters Way & Spr %</i>		14	58											39	
NW	St Paul's & Swindon	12	23	59	166		<5	6	153	11	6	6	<5	6	<5	462
	<i>St Paul's & Swi %</i>				36				33						12	
NE	Pittville & Prestbury	26	10	16	87		<5	<5	132	38	29	13	11	30	17	419
	<i>Pittville & Prestb %</i>				21				32						71	
	Total	1286	1553	866	644		106	16	494	102	331	217	85	285	127	6240
											= 31%				714	
	non-GCC	<5	5	<5	<5	<5	<5	29	6	<5	161	69	24	100	37	3157
N	Bishop's Cleeve	16	10	9	5			11	721	80	32	23	13	38	12	978
E	Bourton-W & Northleach	12	<5	<5	<5	<5			<5	<5	23	8		7	<5	594
SW	Brockworth	8	55	<5	<5	189	248		<5		23	31	13	26	34	877
W	Churchdown		7	<5		<5	427	<5			14	35	13	46	20	725
S	Cirencester Beeches	15	<5								29	<5	<5	18		635
S	Cirencester Park	9									18		<5	7		494
NW	Highnam		12	5	<5	<5	92	109	16	<5	40	39	25	25	32	682
S	South Cerney	6							<5		21	<5		<5		556
NE	Winchcombe & Woodmanc	36	<5	6	7			6	202	274	39	20	14	39	14	696
	<i>Subtotal</i>	102	84								239 = 22%					
	Abbey		<5	<5	<5	78	49	<5			11	24	63	17	76	881
	Barnwood & Hucclecote	<5	5	<5		48	202	<5	<5		17	43	43	40	65	770
	Barton & Tredworth		<5			15	6	<5			12	39	89	44	69	1204
	Bisley & Painswick	<5			<5	20	6	<5			37	13	23	12	19	632
	Fairford & Lechlade										10	<5	<5	<5	<5	586
	Hardwicke & Severn					<5					10	<5	35	9	35	672
	Kingsholm & Wotton		<5			<5	42	8			21	64	30	47	44	586
	Longlevens	<5	<5	<5		6	150	7	<5		20	48	40	53	43	773
	Minchinhampton	<5									36		6	7		814
	Nailsworth										21	<5	6	<5		580
	Quedgeley					<5		<5			11	14	45	6	69	704
	Rodborough										15	<5	6	<5	<5	718
	Stonehouse		<5								12	<5	10		<5	718
	Tewkesbury	<5		<5	<5			422	<5		15	13	7	22	5	500
	Tewkesbury East	<5		5		<5		750	13	17	23	16	12	15	7	867
	Total										671					
	Grand Total	1406	1672	921	673	445	1364	1376	1472	491	1080	874	848	1011	954	38291

Cheltenham Secondary Feeder Primaries, averages from Fol										T2
	Balcarras	Bournside	All Saints'	Pittville	Henley Bank	Chosen Hill	Tewkesbury	Cleeve	Winchcombe	Pate's
	SE	SW	NW	N	SW	W	NW	N	NE	
Charlton Kings J	84				x		x	1	x	x
Glenfall Community P	14									
Holy Apostles P	17							2		
SE Sum										
Leckhampton P	21	19								
Naunton Park P	18	22								
Warden Hill P		37				7		2		
Greatfield Park P		22				1				
Lakeside P		39				6				
St. James' P	3	23								
St. Mark's J		38	2			7				
S Sum										
Hesters Way P			22							
Rowanfield J		15	32					2		
Springbank P		4	27					1		
St. Thomas More P Cath		3	13							
St. Gregory's Cath	5	7	11			1		11		
W Sum										
Gardners Lane P			8	12				4		
Swindon Village P		2				1		22	2	
Dunalley P		2		15				7		
Gloucester Road P		5	3	6				1		
Christ Church P	2	11						1		
NW Sum										
Oakwood P				23				5	4	
Holy Trinity P	4			13				2		
St. John's P	2	2	4	8				5		
Prestbury St Mary's J	3							22	7	
NE Sum										
Feeders	156	227	122	77		277		181	51	
Non-Feeders	33	34	19	77		53		57	42	
Independents	17	4				2		2		
Total	206	266	143	155		232		240	97	
17/18 NOR	1406	1672	921	672		1363		1469		
18	1401	1699	925	756		1363		1463		
19	1406	1736	955	801		1364		1479		
20	1403	1767	985	828		1366		1497		
21	1386	1800	1021	873		1366		1513		
22	1388	1836	1061	875		1368		1554		
23	1385	1865	1091	875		1368		1582		
24/25	1361	1891	1119	875		1369		1611		
% Increase	-3	12	18	23		0		9		

		Allocated Secondary (for September 2017):																		T3				
Primary	Chelt Total	All Saint	Balcar ras	Bourn side	Pittvil le	Pates	Chose n H	Millbr ook	Thom Rich	Hs Girls	Ribst on H	Crypt	St. Peter	Marl ing	Strd High	Clee ve	Winc hc	Cotsw old	Auto Sum	Total				
Airthrie/Hillfield			2.5	2.5		2.5	2.5		2.5	2.5	2.5			2.5	2.5		2.5	2.5	2.5	17.5	14			
Berkhampstead Sch		2.5	5	2.5		2.5			2.5	5	2.5						2.5	2.5	2.5	32.5	33			
Dean Close Prep		2.5	2.5			2.5			2.5	2.5		2.5								2.5	17.5	10		
Dean Close School				2.5														2.5		2.5	7.5	2.5		
Rendcomb College				2.5		2.5										2.5			2.5	10	9			
St. Edwards Prep			10	2.5	2.5	2.5			2.5		2.5							2.5	2.5	2.5	27.5	25		
St. Edwards School			2.5																		2.5	2.5		
Wycliffe Prep			2.5						2.5							2.5	2.5				10	10		
Totals	50	2.5	20	8	2.5	17	2.5	0	12	12	6	8	0	6	10	2.5	6	17	132	163				
Out of County / Other	63.5	9	2.5	2.5	2.5	47	2.5	0	34	30	10	8	2.5	31	37	2.5	2.5	44	267.5	713				
						2.5								2.5	2.5									
Leckhampton P		2.5	24	17			6			2.5	2.5		2.5								2.5	59.5	58	
Naunton Park P			19	25	6		2.5			2.5	2.5	2.5										60	59	
Warden Hill P				41			2.5	5	2.5	2.5	2.5	2.5	2.5						2.5			66	59	
Greatfield Park P		2.5		18				2.5		2.5	2.5	2.5										30.5	30	
Lakeside P		2.5		40			2.5	5		2.5	2.5		2.5									57.5	55	
St. James' P		2.5	2.5	24			2.5			2.5	2.5	2.5	2.5						2.5	2.5		46.5	45	
St. Mark's J		2.5		34	2.5		2.5	9		2.5	2.5		2.5						2.5	2.5		63	55	
Sum	284	12.5	45.5	199	8.5		18.5															383	361	
Hesters Way P		21		2.5																2.5		26	24	
Rowanfield J		31		16	7						2.5	2.5							2.5			61.5	59	
Springbank P		26		2.5	2.5			2.5	2.5										2.5			38.5	36	
St. Thomas More P Cath		14		2.5	2.5						2.5								2.5			24	20	
St. Gregory's Cath		10	2.5	7	13		2.5	2.5		2.5	2.5	2.5	2.5			2.5	2.5		8	2.5		63	60	
Sum	162.5	102	2.5	30.5	25		2.5																213	199
Gardners Lane P		9			19															5			33	34
Swindon Village P		6		2.5	18			2.5		2.5	2.5		2.5							24	2.5		63	58
Dunalley P		2.5		6	10						2.5									8			29	27
Gloucester Road P		7		5	5											2.5				19.5	19			

[illegible]

The above table for Cheltenham and surrounding schools shows the Primary-to-Secondary transfers in 2017. It is taken from the whole-county data released by GCC under FoI (to an undisclosed requestor) on 13/3/2017, Ref. 5297519.

That FoI Request merely asked for the Secondary transfers from Independent Primaries, which are therefore grouped at the top of the table. However, data is present for all Gloucestershire primary schools.

For "confidentiality", GCC displays all numbers below 5 as "<5"; therefore, in order to auto-sum the rows and columns, these have been converted to a low number **ending in ".5"** (as appropriate to approximate the definite 'Total' rows and column, which are GCC-supplied figures not autosums).

The more significant flows are highlighted in yellow.

These current figures show that there is **no** massive Transfer "problem" for pupils from the Southern (Leckhampton) group of Primaries. Concerning the claimed 'Leckhampton Corridor', **only 6** (from Naunton Park) went to Pittville instead of to their nearer Bournside.

Yet Bournside accommodated **21** from more distant Christ Church, Dunalley and Gloucester Road primaries, plus **23** from Rowanfield and St. Gregory's. **Accordingly, it must be possible to eliminate any long-distance-travel injustice for southern Cheltenham, by simple 'catchment' adjustments.**

With burgeoning Bishops Cleeve, it is clear that Cheltenham imminently needs an additional Secondary in the North or West of the town, **not** in the landscape-sensitive SouthWest (where it would inevitably act post-JCS as 'Trojan horse' for hundreds of extra houses, or for the densification of Miller Homes' supposedly "200" dwellings on Leckhampton fields).

Analysing Cheltenham (Primary-Secondary transfers, within-town and external)

In summary, **980 entered** the 5 Chelt secondaries, of which **c.60** came from Out-of-county, which leaves **920** accommodated from Gloucestershire primaries, of which **c.800** are came from Chelt primaries.

1043 came out of Chelt primaries. Of those, **c.245** (1043-798) did not go to the 5 Chelt secondaries. At least **80** went to Cleeve/Winchcombe secondaries; at least **20** went to Chosen Hill.

It is not possible to determine the above Chelt subtotals more precisely, nor the subtotal going to Gloucester/Stroud **grammars**, because GCC's "<5" entries cannot be summed.

Therefore, definite Subtotals need to be supplied for the Chelt **primary school Groups**, and also for this spreadsheet's other groupings (i.e. the generated auto-summed rows and columns, which are highlighted as blue/italicised).

A column also needs to be supplied for primary school numbers transferring to 'Out-of-county/Other' (e.g. to Independent schools).

Overall, this spreadsheet provides a concise-width format for **analysing Cheltenham education** by town-area, which GCC Education ought to want to fill in more accurately, or elected representatives demand be published.

Gloucestershire JCS and an unjustified EXTRA Secondary school, being wrongly sited in the South of Cheltenham

The strategic 'Gloucestershire JCS' (the country's longest Examination of a 'Joint Core Strategy') is just now Adopted (on 11/12/17), and Cheltenham's housing growth is confirmed as predominantly in the **NorthWest** and the **West**, where a new secondary school (and two primaries) are developer-funded.

Developer proposals in the town's over-extended **SouthWest** (landscape-sensitive and radial-roads-deficient) were cut back by the JCS Examination.

Thus there is least justification for Gloucestershire County Council (non-participant in the JCS) suddenly now to inject an extra Secondary school into the most sensitive '**valued landscapes**' of SouthWest Cheltenham.

During 2017, GCC evaded submitting this claimed extra 'need' to the JCS Examination for public scrutiny, despite it clearly requiring a 'strategic' site (e.g. cross-boundary into Tewkesbury District) as it is intended to serve **all of Cheltenham "and the surrounding area"**.

The school's SouthWest location is unjustified AND the overall demand is unjustified, as has been amply contested (with more and better-based figures than GCC itself has ventured to publish). See attached Appendices.

This issue amounts to little more than a two-year 'bulge' in pupil numbers, being 'over-spun' by GCC in order to please some parents wishing to send their children to a 'better' school located in a **more affluent** suburb in South Cheltenham (regardless of those neighbourhoods being severely landscape-constrained, generally towards the AONB Cotswolds hillside).

In SouthWest Cheltenham, with the JCS now concluded, there is simply no tolerable site (of 8 to 10 hectares) available for a large Secondary school, **whereas** there is land in the West approved for release from the Green Belt (and also sites in the North JCS-indicated as releasable), and these are sectors of the town where the pupil demand **is** mainly arising.

Existing catchments should simply be adjusted so that **all pupils residing to the south of Bournside** can at least gain admission to their nearest secondary, Bournside (which is currently the 'second choice' of the two Secondaries in the southern half of Cheltenham).

Cheltenham's twentieth-century southwestern suburbs form the furthest outward extension of the town from its centre, suburbs which are already too extensive for the inadequate radial roads in that direction, primarily the A46(South).

However, County and District senior officers continue to disregard the deficient roads and the landscape constraint (now confirmed by the Secretary of State as NPPF 'Valued Landscape'). Instead, largely due to GCC's disappointed landholdings, they continue to work to undermine the JCS verdict.

After extensive evidence and debate, the JCS Examination ruled that the Leckhampton 'countryside' does qualify for a sizeable **LGS** (Local Green Space), which is based upon its **"varied topography, landscape history, dense network of footpaths, and pedestrian access from several residential districts"** (1992 Local Plan Inquiry verdict).

The Leckhampton LGS includes all of the key 'figure of eight' Walking Loops.

Yet the proposed school would alter (unacceptably) the character of six hectares of that LGS 'countryside', converting it to urbanised playing-fields (inevitably containing some structures), and would sever one of the key 'walking loops', (the field path from Brizen

Lane to Kidnappers Lane).

Moreover, any SouthWest Secondary school site will act as a Trojan horse for the hundreds of houses (a claimed 'omission site') which the JCS Examination decided not to approve.

The way that senior Council officers operate is by withholding information (even when asked for, and even if requested under Fol) in order to progress the scheme they first thought of, evading any 'inconvenient' public criticism (however sound and legitimate), by delaying publication of the "evidence" for months until days before their Decision meeting.

Will anyone restrain this malpractice ?

For the two CBC and GCC decision meetings on 11th and 13th December, I submitted the attached document **A0.4** (plus its complete set of Appendices numbered **A1 to A8**, as itemised at the beginning of A0.4);

to these are now added **A9** and **A10**, which are the latest communications in the 'figures dispute' with GCC.

Summary for: **CBC councillors** (Full Council on **11th** December 2017) **and** for **GCC Cabinet** (13th December)

1

GCC Cabinet will be unwise to approve this awkward site (which requires land purchase) when the 'supporting' figures are still not convincing, are skewed towards this venture, have already been substantially contested, and were published so very late (ten months after GCC's relevant 'Strategy Reports' were printed in early 2017, but oddly were not publicly released - until two days ago (as 'revised' versions) on **5th** December.

This shamefully delayed release of data acts to make it unjustly impossible now to resolve the many criticisms of GCC-Education's calculations, **unless** the decision is deferred to January to allow time for proper (independent) assessment of the methodology and of GCC's blatantly wrong focus solely upon site Options in the SouthWest of Cheltenham (where the Housing demand is not primarily arising).

2

CBC Full Council should not agree to slip this Secondary school site prematurely and so abruptly (and thus far so secretly) into the Local Plan, (which is in effect the Plan's final version because no further adjustments will be possible, regardless of the forthcoming eight weeks "consultation", before **Submission** to an Inspector).

As stated above for the 'applicant' GCC, this decision needs more consideration time, given the schemingly late disclosure of both its 'supporting' figures used and the too few 'site options' considered.

Otherwise, this one item of unheralded 'site inclusion' into the Plan must properly/democratically be reconsidered by Full Council following receipt of the consultation Responses/assessments, prior to Submission.

Attached documents:

A1 GCC 'Strategy Report - Secondary', first published **4-12-17**

A2 GCC 'Strategy Report - Primary', first published **5-12-17**

A3 GCC's Local Plan request & Evidence:

A3A GCC 'Site Options' report, first published **4-12-17** & accompanying:

A3B GCC Request letter to CBC (Tracey Crews), first published **4-12-17**

A4 Figures Challenge, Mary Nelson, issued 27-11-17

A5 Scheme and figures Challenge, Ken Pollock, ver.01 issued 30/11/17

A6 GCC's unreleased 'Strategy Reports' (photographed):

A6A Secondary - January 2017

A6B Primary - March 2017

A7 Dialogue (and FoI Request) by Ken Pollock with Tim Browne, and the Information Commissioner.

A8 Public Questions to GCC Full Council (6th December), with evasive non-Answers

GCC's 'South Cheltenham Secondary school' project ...

- 1 is poorly evidenced and is challenged in detail (despite the difficulty of doing so, when reports are released so tardily, probably deliberately so);
- 2 is in a wrong sector of the town, away from the greater new-housing need;
- 3 gravely risks scuppering or long delaying the developer-funded All-through school in the NorthWest urban extension; and would also snatch half of Bournside's catchment, if not sited further away;
- 4 is far from being the only Option;
beyond this GCC fixation on some 'cheap' greenspaces in the SouthWest of Cheltenham, far fewer £millions could be put into simply accelerating the delivery of the approved NorthWest Secondary school, by lightening that developer's obligation for large schooling and transport infrastructure;

In the absence of timely and consulted-upon evidence:

- A **CBC** is wrong to slip a sudden site into its Local Plan, giving it "weight" and pre-commitment;
- B **GCC** is wrong to bring this decision first (and only) to Cabinet, authorising immediate (and irreversible) acquisition of land, ahead other large County-debated outlays needed.

Therefore, this is a procedural **complaint** against (colluding) officers of both the above Councils, for needlessly undemocratic **secrecy** combined with indecent/outflanking **haste**.

There is already a FoI Complaint registered with the Information Commissioner against GCC, specifically against the Head of Education for obstruction of a data request made in August concerning this scheme, (dialogue attached at **A7**).

Decision pauses (by CBC and GCC) are now essential:

- 1 to allow **independent assessment** of the rival calculations;
- 2 for CBC Full Council to re-consider this Local Plan inclusion item **BEFORE** Submission;
- 3 for GCC to reconsider this large Cheltenham expenditure in its Full Council, considering that Cheltenham already has a new Secondary school planned (developer-funded) in its NorthWest urban extension, whereas Gloucester (expanding much more) has no budgeting for any new Secondary.

Contrary to GCC Cabinet papers claiming "consultations" (with a long list of consultees), there have been very few (and none with the public), as is evidenced by no Report being presented summarising any such feedback.

The claimed Secondary "need" (and its claimed imminence) are being hugely overplayed by GCC, probably in order to progress a development scheme which is GCC's last chance to '**utilise**' (effectively to encash) GCC-owned fields (of c. 6 hectares).

IF this **2019** Secondary bulge were truly a result of the **2012** Primary intake year "moving through", then it would have been detected long before now; and would and should have been communicated to the JCS Examination's Infrastructure sessions (the last of which opportunities was in July this year).

Demographically, i.e. regarding just the 'birth rate' (not new housing and net in-migration), GCC is establishing this extra Secondary of **900** spaces based on a now semi-historic two-year bulge (Birth years 2006 and 2007, which become Year7 Entry numbers in 2017 and 2018), a bulge which totals merely **232** pupils, for whom expansion provision has necessarily already been made.

After 2018, the demographic Year 7 projected figure oscillates yearly between plus 6% and minus 8% compared to 2018, ending 2% down in 2027.

Moreover, for just a bulge "moving through" a school, it is not necessary to build an extra classroom for every Year group, and then leave it empty after that year's bulge has passed.

Beyond the above demographics, Cheltenham's strategic and non-strategic Housing development is primarily occurring in the West and NorthWest; yet GCC Cabinet is choosing to pander to parental "preference" to send their children to Secondaries located in the South, ignoring the environmental impact.

The officer blocs of both Councils know that there is (well set out) doubt over the veracity of the touted figures and concern over the exceptional sensitivity of the landscapes targeted. Yet they persist in colluding (away from publication and due scrutiny) to propel this dubious and extravagant scheme to do its (very avoidable) harm to valued landscape, and in a borderline-"severe" traffic area.

This will also be a Local Plan objection.

This will include a reasoned objection to the validity of adding a gratuitous **Policy GI-1** 'concession' to "playing fields" inside any LGS (Local Green Space), weighing against its decisively rural 'character', and

with the likelihood of subsequent encroachment by buildings.

Nor would it be tolerable to have a 'Trojan horse' school dragging with it 500+ houses plus commercial into the Green Belt gap 'coalescing' towards Shurdington, by breaching the 'strong' Green Belt boundary of Up Hatherley Way. The scheming officers clearly have this as their fall-back choice, thereby continuing to neglect consideration of all the better options.

GCC Education is using selective figures and arguments, to bolster the need for this scheme assailing "desirable" SouthWest Cheltenham.

In its 'One step closer' press release on 29/11/17, GCC has finally admitted that this new South Cheltenham Secondary school site is "**to serve Cheltenham and the surrounding area**", i.e. drawing from across the whole town and wider afield.

GCC-Education has claimed that most of the pupils in 'oversubscribed' (i.e. more "desirable") Primaries in South Cheltenham live "less than 2 miles away". However, even if true, this is specious reasoning because a radius of "2 miles" from e.g. St. Mark's Primary (placed in the Leckhampton/Hatherley Group) covers the whole of West Cheltenham (e.g. Hesters Way) and most of the town's Centre, which therefore **can and does** mean travelling across town.

Instead of voting for wrong or unconvincing decisions (simply believing officers), **all councillors should want to trouble to find the wisest, well considered site choice and timing for Secondary expansion across Cheltenham.**

A further Secondary School for Cheltenham, additional to the JCS-planned All-through school at Cheltenham North West

Summary

Two of Cheltenham's four non-selective Secondary schools (the most desirable two) are already located in the Southern quadrant of the town.

It would be unbalancing to insert a further Secondary into the more fashionable South, when the bulk of the population growth (JCS approved) is coming mainly in the NorthWest and West.

Evidence sought from County Education over the past several months (of which very little has been forthcoming) indicates that there is simply **no properly proven need for an additional secondary school**, and certainly not for its siting being in South Cheltenham.

Furthermore, Cheltenham's environmental and traffic constraints are highest for the southern greenfields/Green Belt, approaching the Cotswolds AONB and accessed off the overloaded A46-South, Shurdington Road.

Queries (including under Freedom of Information) to Gloucestershire County Education have so far yielded only serial unhelpfulness. Finally, a skimpy website has appeared, merely 'promising' to supply the full justificatory figures.

Yet two 'Strategy' documents forecasting Cheltenham Secondary and Primary places were produced by County Education in (respectively) January and March 2017, but have never been made public (despite requests). Photographed copies are attached.

Like all GCC Education's statements and replies on this topic, the above two 'strategy' documents are unsatisfactory and unconvincing, due to their partial and too selective data. The document on Secondary strategy is criticised below.

Main conclusions:

Government Education and ONS projections do not support GCC's claimed demand for an additional Secondary school placed in South Cheltenham.

Eroding a further large area of Green Belt, LGS or greenfield now in South Cheltenham would effectively swindle the lengthy, just completed JCS consultation and Examination process.

Given the currently greater desirability/Rating of Secondary schools in the more affluent but landscape-constrained South, County Education is giving too much weight to the consequent "parental choice" to travel across town to reach them.

- | | | |
|---|---|--------------------------------|
| A | Has the need been properly demonstrated ? | No |
| B | Where could it be sited ? | Not in <u>South</u> Cheltenham |

A Has the need been fully and openly demonstrated ?

A full statistical and forecast analysis has not yet been published (for Cheltenham and its environs) to support any additional secondary school in Cheltenham beyond the one which is already JCS-planned (and developer-funded) in the forthcoming 'North West Cheltenham' urban extension.

It has recently been revealed that Gloucestershire County Council's Education department compiled 'Strategy Reports' early in 2017 forecasting Secondary and Primary school demand, but chose never to

publish these, neither on their website nor in evidence to the JCS Examination in Public, whose final 'Infrastructure' sessions were in July 2017.

Yet meanwhile, GCC has been progressing a 'search for a site', via consultants (unnamed, but now known to be Alder King).

Of course, GCC does have its own landowning interest in South Cheltenham (two fields on the east side of Farm Lane, Leckhampton), but these two fields have now been ruled as valid LGS (Local Green Space) by the JCS Inquiry Inspector.

The two 'education strategy' documents are:

*Strategic Review of Secondary Education Planning for Cheltenham - January 2017, and
Strategic Review of Primary Education Planning Areas to the Central, South and West of Cheltenham -
- March 2017.*

Electronic copies of these documents need to be published, plus the corresponding strategy documents for all the adjoining and interdependent 'education planning areas' of Gloucester and Tewkesbury.

Evidence from sight of the above documents shows that Cheltenham's non-strategic housing growth is occurring least in the South. See Table 1 below.

Two rounds of my FoI request have failed to elicit the full breakdown which I requested, namely which Wards (or parishes) do pupils come from to each Cheltenham Secondary school.

After saying they held the data, but **would not disclose it** because "some" information (although not my requested breakdown) was available on a government website, then **two dilatory/obstructive months later** GCC Education finally admitted that they do not keep a breakdown by Ward.

The new GCC website (at: <http://www.gloucestershire.gov.uk/cheltenham-school-planning> or <http://www.gloucestershire.gov.uk/education-and-learning/school-admissions/school-places-in-cheltenham/>) announced to me in a FoI reply on 24th October, still today contains little data (just one small snapshot Table, for one school year, Year 7).

It is not possible to track where this claimed 'demand surge' came from in the past or whether it is likely to be sustained into the future.

The Year-7 Table is below:

Cheltenham Secondary School Year 7 Data Table

School Name	Admissions	Forecast				
	Sept 2019	2019/20	20/21	21/22	22/23	23/24
All Saints' Academy	180	180	175	180	180	180
Balcarras School	194	196	196	196	196	196
Bournside School	300	300	289	300	300	300
Pate's Grammar School	150	150	150	150	150	150
Pittville School	175	180	180	180	180	180
Unplaced Pupils		62	27	95	90	81
Planning area sub total	999	1068	1017	1101	1096	1087
Available Places		-69	-18	-102	-97	-88
Additional places required to meet						
demand from housing		31	47	56	65	65
In-year capacity		28	27	30	30	30
Total additional places required		128	92	188	192	183

It is clear that GCC cannot show (and probably does not have) the data to justify this 'new South Cheltenham secondary' venture, as indicated by the slow/non-disclosure of comprehensive data, which certainly questions the wisdom of any government funding (£40m) for this scheme.

If it can **evade** having to explain the demand with comprehensive figures, then County Education would be **free to sanction any scheme**, even if that provides excessive school “choice” for the parents of more affluent neighbourhoods, instead of in the areas where the emerging need is much greater.

Residents of South Cheltenham remain suspicious that GCC is still trying to encash its fields in Farm Lane Leckhampton, which the JCS Inspector has ruled should remain as Local Green Space.

(An even worse suspicion by some is that insensitive Council officers having spent so much time working with developers still now disagree with the JCS Examination’s final Green Belt protections and would like to see Cheltenham sprawl out to Shurdington.)

Table 1 Source: Appendix 2 of GCC's 'Strategic Review of Secondary Education Planning for Cheltenham'
[Large and questionable figures are highlighted in red]

**Cumulative New Houses (non-Strategic)
by Ward**

	Ward Origin	1917-18	18-19	19-20	20-21	21-22
East:	Battledown	31	89	139	189	239
	Charlton Kings/Park	11	16	16	16	16
		42	105	155	205	255
NorthEast:	St. Paul's	72	86	133	183	233
	Prestbury	29	79	129	179	229
	All Saints	59	81	88	95	95
	Pittville	27	27	50	73	73
	Oakley	6	6	6	6	6
		193	279	406	536	636
Central:	Lansdown	109	158	246	280	310
	College	25	25	61	116	137
	Park	29	29	34	34	34
		163	212	341	430	481
West:	St. Peter's	31	81	128	178	210
	St. Mark's	17	23	36	36	36
	Swindon	2	15	27	34	34
	Hesters Way	0	0	0	20	31
	Springbank	17	17	17	17	17
		67	136	208	285	328
South:	Leckhampton	19	20	20	20	20
	Up Hatherley	5	5	5	5	5
	Benhall/Reddings	2	2	2	2	2
	Warden Hill	2	2	2	2	2
		28	29	29	29	29
	Cumulative Houses	493	761	1139	1485	1729
	Cumulative Pupils (@ 0.15)	68	107	161	211	246

Concerning the January 2017 '**Secondary Review**' document (see preceding Table), it clearly will need revision (although that is not an excuse to continue to keep it unpublished).

The JCS has moved on. Housing Trajectories have been revised. Leckhampton is no longer a JCS 'Strategic Allocation', and Housing there will instead be subject solely to the forthcoming Cheltenham Local Plan process.

The primary pupils from Tewkesbury Borough Council's 'Site SD2' in Shurdington parish (off Leckhampton Lane) are assigned to Shurdington primary school, which is implementing a £1.4 million extension.

When the forecast Secondary pupil figures by Ward in the strategy document's **Appendix-2** are grouped by quadrant of the town (see **Table 1 above**), it is immediately clear that the additional (non-strategic) demand is mainly arising in the **NorthEast, Centre and West** of Cheltenham, not in the South.

In addition, we know that the much larger 'strategic' demand will arise in the **NorthWest and West** (i.e. from the JCS-approved urban extensions).

In deriving numbers of pupils from the number of new houses (for which the Strategy document uses a simplistic 0.15 ratio), allowance needs to be made in the more central 'non-strategic' areas of Cheltenham that many of the new dwellings are flats and are for the retired, i.e. generating very few pupils.

For example, the forecast for **Lansdown** ward (building flats, with few teenagers) is unrealistically high.

B Where could a further Secondary school be sited ?

Cheltenham has four non-selective Secondary schools, the most popular of which (Balcarras and Bournside) are located in the more affluent Southern quadrant of the town. They are also the two secondaries which have large Sixth Forms.

There is no available land for a further Secondary located between these two schools; and there is now no 'gap' in Leckhampton between their two catchment areas.

Therefore, if secondary pupils living anywhere between these two schools cannot get entry into either of their nearest schools, then a further school (to relieve that "pressure") should only be sited West of Bournside; and then the two catchment area(s) should be 'drawn further together' (overlapping more around Leckhampton Road and Naunton Park) in order to relieve that demand pressure.

In other words, instead of being symmetrical (to east and to west), Bournside's catchment needs to extend further to the east than to the west; and then a further school to the west (or north) of Bournside could eventually be inserted.

Inserting a further Secondary to the South or SouthWest of Bournside (necessarily within 1 km thereof) would **displace Bournside from much of its existing catchment**. It would also necessarily impact upon South Cheltenham's valued greenfield and Green Belt, dragging with it (as a Trojan horse) hundreds of houses not recommended here by the JCS Inspector.

A further school accessed off Shurdington Road (A46 South) would also be likely to undermine the catchment of struggling Millbrook Academy at Brockworth (currently being transferred to Greenshaw Learning Trust, of Sutton).

A secondary or all-through school (plus playing fields) represents a **major land requirement** (circa 15 hectares), especially in "most constrained" Cheltenham, whose countryside setting of the Gloucestershire Green Belt (the smallest Green Belt in the country) has just sustained the highest percentage erosion (by 16%) through the reasoned JCS planning process. That revised Green Belt boundary is intended to be permanent, until well after 2031.

Yet we understand that GCC has engaged "consultants" to identify a new school site, although the parameters for this 'search' remain hidden from scrutiny.

If so much land cannot be found within Cheltenham's urban area, then the correct procedure is to look next at those additional areas which the JCS Inspector recommended *could* be removed from Green Belt (but

which CBC did not take up in its JCS Main Modifications, simply because Cheltenham has met its JCS Housing target, (unlike Gloucester and Tewkesbury Districts). These 'available' areas are along Cheltenham's **Northern** periphery, closer to where the town's population growth will be arising, (plus close to the burgeoning 'satellite town' of Bishops Cleeve).

However, before considering yet more removal of Green Belt, consideration should first be given to locating a further school inside the (recently added) '**West Cheltenham**' urban extension (A11). This can be done at A11's southern end, near the junction of Fiddler's Green Lane and Pheasant Lane, reachable on foot from bus stops at the Arle Court roundabout (A40). Commercial development within A11 can be displaced slightly northwards, (especially considering that the primary commercial access is now proposed (in JCS Transport Strategy DS7) to be from the north-west, M5 Junction 10).

A further alternative where land is scarce is to share an existing campus and playing fields, and to make the Secondary school buildings multi-storey.

In Chippenham, two large Secondary schools (Sheldon and Hardenhuish) are located on opposite sides of Hardenhuish Park, containing playing fields. Here, Bournside (largely single-storey) has the largest green site; if its adjoining St. James' Primary School, Merestones Road, were to be found another site, then it might be replaced by a compact, modest-sized Secondary, (accessed not off Bournside Road but from the east, off The Park).

The following statements by Gareth Vine replying for Tim Browne, Head of Education, GCC, on 30-10-2017 are all questionable:

"it is not possible to continue to expand existing local schools"

[yet Lakeside Primary has just demonstrated expansion]

"General Practitioner data is the key information used to create pupil forecasts at a local level."

[but only for Reception class entry into Primaries]

"including patterns of parental preference"

[not just 'including' but over-acceding to/encouraging]

"Secondary forecasts are heavily influenced by pupil numbers in feeder primary schools"

[growth in the west and north Cheltenham primaries is far greater than in the south]

This 'new South Cheltenham school' project is a data nightmare, whereas all the data and projections ought to be held by County Education in a professional 'data cube' broken down multiple ways, for proper analysis.

What is needed is complete figures (actual and forecast) for the whole of Gloucestershire, broken down by residence Ward and by Destination school.

I requested this in August (under FoI IF GCC was unwilling to disclose). Three months later GCC is still misusing FoI 'maximum delay' to stall/decline this disclosure.

Instead, there comes a drip-feed of partial data.

Other factors are cited, such as "General Practitioner data" allegedly being "key", when GP data is only essential for forecasting Reception Year numbers entering Primary school.

C Context

Cheltenham's environmental layout (circumscribed by AONB and by Green Belt) is historically and unavoidably such that the more affluent/older residential areas are generally abutting the Cotswold hills to the South and East, and the less affluent and JCS-expanding areas are towards the flatter NorthWest (and West).

Optimising travel-to-school distance requires that further Secondary school provision now needs to be towards the growth districts towards the NorthWest and West.

If the developer-funded NorthWest secondary school is now being delayed (possibly due to unfinalised transport provision for those 4000+ houses, plus commercial), then any government schools funding should be directed there in the first instance.

It must have been GCC guidance which initially caused the NorthWest developer to prioritise school provision ahead of roads provision (principally the glaringly needed creation of an essential 'outer orbital' road to support Cheltenham's massive NorthWest plus West urban extensions, and to link Bishops Cleeve to Gloucester).

In promoting a 'quick' South Cheltenham secondary, it appears that GCC is giving far too much weight to "parental preference", which amounts to trying to engineer this town's Secondary school provision away from its less advantaged districts.

Instead, the correct education strategy (especially with major urban expansions now virtually approved) is to bring the less popular schools up towards the higher level (e.g. with Balcarras or Bournside as sponsors).

IF there is a significant and a continuing Secondary shortfall in Cheltenham (rather than in much more expanding Gloucester, where curiously no new Secondary is being proposed), and if that shortfall can be properly documented and published, then there are many solutions more cost-effective and environmentally acceptable than creating an entire all-through school in advance of the planned NorthWest school.

For example, a combined all-through school might be desirable, but it demands a single bigger site, which is hard to find.

What is required is transparent local figures and open consideration of and consultation on all the options.

Any school inserted into countryside at most desirable South Cheltenham will immediately be piggy-backed by the queue of house developers whose eager (because most profitable) Southern incursions were curtailed by the proper JCS Examination in Public.

There must be no 'Trojan school' into yet more Gloucestershire Green Belt at Cheltenham.
Other solutions exist.

The two agricultural fields off Kidnappers Lane have largely been "selected" because GCC happens to own them; and GCC had intended to profit from them by means of an Edward Ware Homes housing development, until the JCS Examination Inspector ruled that the fields form part of the 'valued landscape' at Leckhampton which she has approved to become a Local Green Space (LGS).

The document which GCC has just released, on 29-11-17 (located at:

<http://www.gloucestershire.gov.uk/gloucestershire-county-council-news/news-november-2017/one-step-closer-to-new-30m-school/>) reveals that this extra Secondary (indeed all-through) school is being justified on skimpy and partial evidence, and that it is attempting to be placed in the landscape-sensitive South of the town where forecast evidence of pupil numbers is growing least.

Moreover, the school is intended to "**serve Cheltenham and the surrounding area**", encouraging cross-town travel into an area of known "severe" traffic impact off the A46.

Contrary to GCC's spin, there has been no "working closely with ... local residents", nor do the published figures substantiate GCC's claimed "real need" in or near this location, SouthWest Cheltenham.

Ken Pollock