

HAMPSHIRE COUNTY COUNCIL

Decision Report

Decision Maker:	Regulatory Committee
Date:	6 June 2013
Title:	Expand the existing secondary school with a 420 place two form entry primary school, making an 'All Through' education provision, proposals include the reprovision of a 55 place nursery unit which is to be retained on site, additional car parking and landscaping are also included within the proposals, part demolition of an existing boarding house and annexed nursery unit is required to facilitate the proposal at The Westgate School and Rotherly House, Cheriton Road, Winchester, Hampshire SO22 5AZ (Application No: 12/02659/HCS) (Site Ref: WRE006)
Reference:	4921
Report From:	Head of County Planning

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1. Executive Summary

- 1.1. This application is to expand the existing secondary school with a 420 place two form entry primary school, making an 'All Through' education provision. The proposals include the relocation of a 55 place nursery unit which is to be retained on site, additional car parking and landscaping. Part demolition of the existing boarding house and annexed nursery unit is also required to facilitate the proposal.
- 1.2. When considering the application the main issues which should be taken into account are compliance with policy regarding highways amenity and safety, sustainable travel modes, parking provision on site for staff and off site parking on local roads for pupil drop off/pick up, design and landscape impact are also key considerations.
- 1.3. Members of the Regulatory Committee attended a site visit on 4 March 2013 to see the site constraints and locality.
- 1.4. It is considered that subject to the additional highways improvements being completed, the proposal is acceptable in terms of highway safety and convenience and it is in a sustainable location to minimise travel by car (Policy CP10 of Winchester District Local Plan Part 1 – Joint Core

Strategy [Adopted 2013] and saved Policy T.3 of The Winchester District Local Plan Review [adopted 2006]). The proposal will not interfere with the safety, function or character of the local road network (saved Policy T.2). The on-site car parking provision is appropriate for the development (saved Policy T.4).

- 1.5. The design, appearance and proposed materials are in keeping with the site context (Policy CP14 and saved Policy DP.3) and the proposed soft and hard landscaping will ensure the development fits with the landscape character of the area and it will not cause any loss of amenity (Policy CP13 and saved Policy DP.4).
- 1.6. The development will appropriately mitigate against any impact to the bats within the site (Policy CP16), not result in any increased flood risk (Policy CP17) and protect any archaeological interests (Policy CP20 and saved Policy HE.1).
- 1.7. The development would meet the immediate needs of the local community by providing a sufficient choice of school places as required by paragraph 72 of the National Planning Policy Framework (published 27 March 2012), and Policy CP6 (Local Services and Facilities).

2. **Site and proposal**

- 2.1. The site covers approximately 3.2 hectares in total. The development is contained within the main Westgate Secondary School campus to the south (c. 2.1 hectares), between Green Lane and Fordington Avenue and Rotherly House to the north (c. 1.1 hectares), between Links Road and Green Lane.
- 2.2. The school is in a suburban area with a collection of detached properties immediately surrounding the site. The school grounds to the north contain the original 19th century Rotherly House and are wooded with many mature trees. The topography drops approximately eight metres from the west to the east. The southern part has changing ground levels and has a collection of school buildings, outdoor play and areas of planting. There is staff parking and access for goods deliveries in both areas.
- 2.3. The nearest houses to the northern Rotherly House site are St Anne's to the west, with a buffer of approximately five metres to the boundary of the site. There are three large detached houses to the west, fronting onto Cheriton Road, whose gardens abut the site boundary.
- 2.4. The nearest houses to the main southern site are the properties on Fordington Avenue. The garden of 65 Fordington Avenue is the closest, as it is approximately 10 metres from the boundary of the application area.
- 2.5. There are no Rights of Way footpaths recorded on the definitive map for this site and there are no other environmental designations.

- 2.6. The proposal is to build a new primary school (provision for 420 pupils) on the site of the current Rotherly House (boarding house) situated between Links Road and Green Lane. The new primary school building will have a footprint at the lower ground level of 850m² and 980² at the upper ground footprint. The refurbishment of Rotherly House gives a ground floor footprint of 290m².
- 2.7. The existing boarding accommodation and 'baby cottage' (part of the nursery provision) on the Rotherly site will be demolished to make way for the new primary facilities but Rotherly House itself will be retained. The nursery would cover 340m² over one storey, adjacent to Cheriton Road. Overall the proposal seeks to create a school that unites all the phases of schooling and learning from three months to 16 years, whilst maintaining distinct identity for each stage.
- 2.8. The new primary classrooms will be in a new two storey building, linked to the refurbished Rotherly House by a single storey wing. The classroom spaces are configured so as to provide favourable levels of natural light and ventilation. The parents and visitor entrance will be on the lower ground floor from which there are clear views through the open plan areas to the courtyard beyond. The library/discovery area is located on the upper ground floor in the centre of the school adjacent to the hall. This top lit area will cater for a variety of learning activities and different group sizes.
- 2.9. The building will be constructed of brick, metal and glass. The traditional pitched roof will be highly insulated and finished with tiles. The smaller areas linking roof will be finished with a high performance roofing system, contributing towards a sustainable building standard. Solid vertical brise-soleil (built-in awning) will provide shade to the more exposed elevations depending on their orientation.
- 2.10. The interior of Rotherly House will be remodelled to accommodate the new school hall and music/drama space. It has been designed for a number of different roles so that it can act as a dining hall, performance space, gymnasium and assembly hall. It is proposed that it can be made available for appropriate community uses.
- 2.11. The infants play area will be to the north, adjacent to the infant classes on the lower ground floor. Junior play areas will be to the south, with level access from the junior classes on the upper ground floor. The primary children will share the use of the Westgate playing fields and there will be landscape work to enhance the new outdoor space to facilitate more use. Soft landscaping will shade, screen and enclose seating areas. It will be designed to offer year round interest.
- 2.12. The main entrance to the primary school will be approached from the south-west along Green Lane, via gently sloping footpaths. A further pedestrian access to the Key Stage 1 and reception play areas will be provided from the northerly end of Green Lane. Sheltered areas will be available at the front of the school and around the perimeter of the infant

classes. Each entrance will be managed by the school, with the secure play areas being opened at the beginning and end of the school day.

- 2.13. The 2-5 year nursery facility currently housed on the ground floor of Rotherly House will be moved to a new building where it will be united with the younger children from the 'baby cottage'. This new nursery will be in light and airy rooms with generous 'free-flow' for the children between inside and out.
- 2.14. To achieve this, the proposal includes the following in the **northern** area:
 - (a) the existing boarding house and the nursery to the west will be demolished, with the original Rotherly House remaining;
 - (b) the new building will include a sports hall within Rotherly House, classrooms and flexible spaces;
 - (c) outdoors will be reception, infant and junior play areas;
 - (d) two staff car parks will be sited within this area, the larger with access off Links Road and the other from Green Lane; and
 - (e) many mature trees and grass areas will remain and be enhanced with new planting and soft landscaping.
- 2.15. The main Westgate site to the **south east**, will have some modifications.
 - (a) the nursery will be relocated to within the main Westgate site to the south east, fronting Cheriton Road;
 - (b) a landscaped area will be created next to the nursery;
 - (c) there would be a new car park in the south east corner of the site, with access from Cheriton Road; and
 - (d) 25 + 2 accessible car parking spaces will be relocated from outside the sports hall/badminton centre to within the whole of the site; and
 - (e) the former car park area will be landscaped to provide a central outdoor learning and recreational space.
- 2.16. Green Lane runs through the site. This a surfaced unadopted road, which becomes a footpath beyond the school campus to the west linking to Chilbolton Avenue. It is not a right of way and there is no known owner at this time. It is not proposed to gate or restrict access along Green Lane.
- 2.17. The local roads are busy with school traffic at peak drop off/pick up times in this area. There is no visitor parking within the site, except for accessible spaces, but there are two hour parking spaces along Cheriton Road and Fordington Avenue. Day-to-day servicing and deliveries to the primary or lower school kitchen will be off Links Road. The car park off

Links Road will be for staff only and will have a controlled entrance. There will be no parent/pupil access to the primary school via Links Road, either by vehicle or by foot. Parents will need to access the primary school from Green Lane.

- 2.18. A Transport Assessment and Travel Plan have been submitted and updated since the application was received and consulted upon. It is anticipated that there will be 60 staff employed by the primary school when at full capacity. This equates to 20 full time staff and 40 part time. Due to the local population demands, the school would have a larger catchment than some other primary schools. There would be a shared catchment between Western Church of England (C of E) Primary, St Bede Church of England Primary and the new Westgate Primary.
- 2.19. The school hours for the proposed primary school, existing Westgate secondary and Western C of E Primary School will be staggered to reduce peak traffic impacts. Currently the secondary school has a start time of 0830 and Western C of E Primary School has a start time of 0850. In the afternoon, the secondary school closes at 1505 and Western Primary closes at 1530. If permission is granted, discussions with all local schools will take place to minimise local disruption further by reaching a 10-15 minute gap between the times. It is also likely that afterschool activities will be held by the school for pupils.
- 2.20. It is proposed to provide a total of 156 parking spaces on the whole site which includes eight accessible spaces and seven tandem spaces which will be locally managed by the school. This enables the provision of 46 car parking spaces for the primary school staff, which meets the staff parking standards (one space per teaching staff and two for every three other staff). There would be 13 on-site spaces to cater for the nursery staff, which is seven more than at present. Included in this number will be two dedicated accessible parking bays for the primary and one for the nursery located as close as possible to the building entrances. There would be no reduction in the number of parking spaces for the secondary school staff (and badminton centre). All car parks will be separated from the children's play areas. In summary this equates to an additional 53 spaces.
- 2.21. The proposed cycle stores will have an additional 52 spaces for cycles and scooters available to pupils, staff and visitors. This will compliment the existing provision at the Westgate school which has 45 spaces over two cycle racks.
- 2.22. There is a controlled pedestrian crossing in operation on Stockbridge Road and an additional controlled crossing has recently been installed on Chilbolton Avenue adjacent to the roundabout junction with Stockbridge Road.
- 2.23. As part of the proposals, a fixed term School Crossing Patrol will be put in place on Cheriton Road, on the eastern boundary of the site following comments from the Highway Authority.

- 2.24. There is a new 'build out' on Cheriton Road, adjacent to the junction with Links Road, proposed with the application. This has been referred to within the Transport Assessment and has been added to the overall proposed site plan. This feature is to help slow the traffic down and provide safer crossing points on Cheriton Road.
- 2.25. The footpath in the area adjacent to the proposed pedestrian entrance to the school on Cheriton Road would be resurfaced and increased in width. The footpath adjacent to the entrances to the nursery will be widened locally adjacent to the trees.
- 2.26. If planning permission is granted and should a sufficient number of pupils be keen to utilise it, Westgate School are keen to introduce a bus service for pupils travelling from the less accessible areas within the proposed catchment – such as Abbots Barton.
- 2.27. In response to many highway concerns raised to the application when it was submitted, the plans now propose the introduction of a parking area for drop off/pick up times, on the eastern side of Chilbolton Avenue (Park and Stride). This provision is between 400 metres and 650 metres of the proposed main entrance to the primary school. The parking will provide additional parking capacity (approximately 32 cars) to accommodate the additional travel demand. It is also proposed that the provision also incorporates an extension of the 30 miles per hour (mph) speed limit from the Stockbridge Road into the margin of Chilbolton Avenue, adjacent to the school playing fields. This scheme will be detailed as part of a Traffic Regulation Order, which is a separate legal process but would be necessary to facilitate the changes desired on Chilbolton Avenue. Updated parking survey information on surrounding roads indicates that with the additional proposed parking on Chilbolton Avenue there will be sufficient on street parking spaces to accommodate the demand for parking generated by the proposals.
- 2.28. The application is supported by a report of the ecological walkover carried out at the site in September 2012 (detailed in the letter from RPS of 6 December 2012) and a Bat Survey Report (RPS, December 2012). The surveys identified large concentrations of bat droppings, believed to be those of Serotine bats, in the loft of Rotherly House. Accordingly, a Method Statement to ensure the bats are not harmed during construction or by the use of the building has been provided and would be implemented if approved.
- 2.29. Environment Agency maps indicate that the site is located in Flood Zone 1, where the annual probability of river flooding is less than 1 in 1,000 for any given year. A flood risk assessment to support the planning application has been supplied. All foul drainage from the primary buildings will be fed into the adjacent foul sewer in Green Lane and from the nursery into the existing buildings. Soakage for surface water testing was undertaken during the geological survey and the appropriate studies carried out at the site. Soakage rates obtained from the tests confirmed

that surface water drainage from the roofs and hard standings will be disposed of by infiltration methods.

3. **Development plan**

- 3.1. The National Planning Policy Framework (published 27 March 2012) whilst not part of the policy plan, is a material consideration. The most relevant text is Section 8, Promoting Healthy Communities, Paragraph 72 and Section 4, Promoting Sustainable Transport paragraphs 29-41.
- 3.2. The Winchester District Local Plan Part 1 - Joint Core Strategy (adopted 20 March 2013). The most relevant policies for consideration are CP6 (Local Services and Facilities), CP10 (Transport Policy), CP13 (High Quality Design), CP14 (The Effective Use of Land Policy), CP16 (Biodiversity), CP17 (Flooding, Flood Risk and the Water Environment) and CP20 (Heritage and Landscape Character).
- 3.3. The Winchester District Local Plan Review (adopted 2006). The saved policies relevant for consideration are DP3 (General Design Criteria), DP4 (Landscape and the Built Environment), HE1 (Archaeological Protection), T2 (Development Access), T3 (Development Layout), T4 (Parking Standards) and T5 (Off Site Transport Contributions).
- 3.4. West Fulflood and Oram's Arbour Neighbourhood Design Statement (adopted 15 May 2008) [Supplementary Planning Document] supplements the Winchester Local Plan as above).

4. **Members Site Visit**

- 4.1. Members of the Regulatory Committee attended a site visit on 4 March 2013 to see the site constraints and the locality. The location of the proposed primary school, location of the new nursery, landscaping and car parks were viewed.

5. **Consultations**

- 5.1. **Councillor Martin Tod** comments "I previously submitted comments as a Winchester City Councillor for St Paul ward on January 30th, 2013 – and while the proposals have been significantly improved since then – I would still stand by the conclusion I and my colleagues reached on that date: Planning permission should not be granted until substantially funded plans are published to promote sustainable travel and improve safety. While the proposals are significantly improved, I do not yet believe that we have such plans in place.

The two material planning issues outstanding relate to parking and transport.

Parking

On parking, I am concerned that the County's parking policy has been designed in reference to rural schools with poor public transport access and so does not do justice to the NPPF – and cannot be judged 'sound' – in the context of a school with good bus routes close to a mainline railway station. Local people have put forward a range of concerns about County policy's compliance with the NPPF which should be addressed, but one statement of particular importance is 4.39:

If setting local parking standards for residential and non-residential development, local planning authorities should take into account ... the availability of and opportunities for public transport.

Neither the policy agreed on April 2nd 2013, nor the parking proposals in the plan, make adequate reference to public transport and the opportunity to reduce parking spaces and encourage public transport use in areas with good public transport connections. It seems to contradict the NPPF that a policy designed to identify the maximum number of places in areas with poor transport infrastructure should be applied equally to Westgate School.

Transport

On transport, I am pleased that the County Council is investigating a Chilbolton Avenue drop-off – although there are important logistical problems to be overcome with the design that has been put forward (see below). I strongly support the Highways Department proposal to make occupation of an expanded Westgate school conditional on approval of an approved and implemented drop-off – while recognising that there is a genuine risk that the concerns raised about the current proposal for a drop-off may be such that the drop-off is not approved in its current form. However some form of extra drop-off area is needed if the traffic generated by the school is to be managed successfully.

The bigger issue is that, even with an approved Chilbolton Avenue drop-off, I do not believe that the measures proposed for Cheriton Road and for Stockbridge Road in particular are adequate to encourage enough people to change from using their cars given the significant increase in likely traffic. The top section of Cheriton Road, at least between Fordington Road and Links Road, needs to be redesigned as a pedestrian-priority area – with particular focus on changes necessary to control the driving of parents who have dropped off their children and are accelerating away from the area – and general reduction of speeds along the whole length of Cheriton Road. Even if the Chilbolton proposal goes ahead, there will be extra pedestrian and car traffic in this area and one extra Pinch Point and a crossing patrol are not sufficient. A large proportion of the potential foot traffic for Westgate and Western comes from the other side of the Stockbridge Road and this is seen as a significant barrier by local parents. Again, an extra crossing patrol is not sufficient. There is a real opportunity to reduce overall traffic in the area – thereby alleviating some of the

pressure put on by the new primary school – by making the crossing more suitable for secondary pupils – but this will require a full pedestrian crossing, not just a crossing patrol. Residents have highlighted how Andover Road and Park Road both act as pedestrian barriers – and, given the new catchment areas, as the primary school fills up, these are also likely to require intervention.

In light of the likely scale of engineering required, I am concerned that the £100,000 earmarked funds for local works are insufficient. The “Addendum School Travel Plan (Appendix E) (Feb 2013)” [P09788] highlights £100k for traffic works in 2014/15 – but given the scale of the challenge, I do not believe this will be anything like sufficient for the scale of works needed.

Other considerations:

Finally, many residents have concerns about the Chilbolton Avenue drop-off, including:

- Safety for cyclists
- Adequate separation from the carriage-way – particularly for parents or children exiting via drivers’ side doors
- Likelihood of dangerous u-turns, especially given congestion on the southbound carriageway at the afternoon peak. It is essential that a full traffic survey is done at pick-up and drop-off times to properly assess likely behaviour during these key periods.

These issues are important – and I would like reassurance that they will be adequately addressed during the TRO process.

Similarly, despite the decision last July, there remain real concerns about the impact of the Westgate All-Through School on Western Primary School – and questions about the level of overall demand for places in the Fullflood area. These are important issues – although I am not clear that they are material planning considerations. As a minimum, it is important that they are properly addressed at the P&R Decision Day on June 26th.

Finally, it is also important that school place capacity is not seen as a ‘burning bridge’ to drive through this proposal, since it was clear last July that there were two viable options (Option A and Option B) in the original decision day able to sustainably deliver the need identified. There were other factors in the decision made on July 17th, 2012, but lack of adequate school places in 2014 was not one of them.

5.2. Winchester City Council has raised objection to the original application documents on the following grounds:

“Whilst raising no objection in principle to the provision of additional education facilities on this site, and acknowledging the benefits these may bring, the development, in its current form, is considered contrary to

policies T1, T2, T3 and T4 of the Winchester District Local Plan 2006 in that:

- (a) it fails to maximise opportunities to reduce reliance on the private car and would not adequately promote alternative means of transport. The development would therefore be likely to result in an increase in the number and length of car journeys in the area of the school to the detriment of the environment and the locality;
- (b) insufficient improvements to transport infrastructure in the area of the school are proposed in relation to safe drop off and pick up points for pupils and measures to promote low vehicle speeds. In addition the scheme as presented does not adequately promote measures for safe and convenient cycle and pedestrian routes to and from the site, including links and access to existing or proposed routes, and does not incorporate adequate provision of cycle parking.”

5.3. **Environment Agency Southern** raise no objection.

5.4. **Highway Authority** raise no objection subject to conditions, and have provided the following detailed comments:

- *Proposed catchment area for the primary school and identification of main pedestrian desire lines and routes;*

A plan showing the recently finalised catchment area for the school has been provided. This shows that the catchment area for the proposed primary school will be shared with the catchment areas of both Western C of E Primary School and St Bede C of E Primary School. It is noted that the catchment area for the school extends to the north to Abbots Barton, and east to include the city centre. This is a wider catchment area than the existing primary schools and the travel patterns taken from them and used to forecast predicted trips to the proposed school need to be reviewed in light of this. In particular it would be expected that a greater proportion of pupils will need to travel by car to reflect the wider catchment area.

The original Transport Assessment considered that the likely mode share for walking rates would be 84.1% and car alone trips 13.8%. As a result of the additional information now supplied, and the extent of the catchment area, the additional information considers the impact of higher car mode share rates of 23%. This is considered more realistic and appropriate, bearing in mind the characteristics of the school, its location and its comparison to other local schools. I am satisfied that the assessment now provided is adequate to forecast the travel demand for the proposed school.

Additional information has also been provided to identify the main pedestrian routes to the site. It is clear that with the location of the school central to the larger catchment area, that pedestrian desire lines can come

from a number of areas. There is generally good provision for pedestrian walking trips to and from the school, with pavements and pathways providing access from a number of directions including Stockbridge Road, Chilbolton Avenue, Bereweeke Road and Weeke.

Additionally, there are a number of controlled crossing points of key routes, including;

- Zebra crossing Bereweeke Road, Stockbridge Road mini roundabout;
- Zebra crossing on junction of Chilbolton Avenue and Stockbridge Road;
- Toucan crossing on Chilbolton Avenue by Links Road;
- School crossing patrol trial on Cheriton Road;
- Recently approved school crossing patrol on Stockbridge Road between Fordington and Western Road as requested by Western Primary.

I am satisfied that the existing walking infrastructure, along with the improvements proposed as part of this application, provide sufficient opportunities for pedestrians to walk to the site.

The Travel Plan will be the primary tool through which to encourage sustainable travel, and this identifies a number of potential improvements that could be brought forward to further enhance opportunities for walking and cycling to the school. Feasibility work is underway to consider the development and delivery of improvements in the future capital programme.

I have now received a plan, referenced P09788 A033, which clearly sets out the pedestrian and scooter routes, and the existing pedestrian crossings.

- *Parking arrangements for staff at the primary school and the allocation of spaces at the new car park adjacent to the primary school;*

The revised plans now submitted identify a total of 46 car parking spaces being provided to support the on-site requirements of the proposed primary school. The addendum information has confirmed that there would be a total of 60 staff employed at the site, of which 20 would be teaching staff, and 40 non-teaching staff. These staff would comprise a Headteacher, class teachers, teaching assistants, a special needs co-ordinator, a site manager, office staff, cooks, lunchtime supervisors and cleaning staff.

The parking provision for staff is in line with the recently adopted On-Site School Parking Guidelines. This parking provision, by virtue of the level provided and the volume of part-time staff employed, would offer sufficient

capacity and flexibility to accommodate any visitors to the primary school site.

The wider site offers a number of community uses on the site, particularly at the secondary school and the badminton club. The badminton club hall is used exclusively for school use during the day, and as such other than general administration or maintenance visits, travel demand to the badminton club is restricted to those times outside of school hours. Equally, there is no permitted community use of Westgate Secondary School during school hours, with any access being limited to non-school hours.

As a result of this, and bearing in mind the level of parking provided across the whole site, it is considered that there is sufficient parking provision being made under this application.

- *Proposed parking monitoring and management measures;*

It is shown on the proposed site plan, referenced P09788 A020, that some of the parking (seven spaces) is provided through the use of tandem parking. This approach is supported, but will require management of the space to ensure that this is used efficiently and properly. Tandem parking is effective where it is well managed. The school travel plan should be required to both manage and monitor this, and a condition to require management procedures to be integrated into the Travel Plan should be attached to any future planning consent.

It is envisaged that the primary school staff car park will be restricted by a limited number of entry passes to staff only. The car park will be gated, and access to the school from Links Road is expected to be limited to staff, minimising the potential for parent drop off activity in Links Road. A similar arrangement for the new Cheriton Road car park will be implemented. Management of the school car parks will be managed by the school and should be controlled by the Travel Plan.

- *Impacts of the proposals on Links Road;*

No pupil access is proposed to the school from Links Road. This will help to reduce the attractiveness of Links Road to parent drop-off and pick up trips.

A traffic survey was carried out on Links Road which recorded traffic levels of approximately 10-15 two-way car trips in each peak hour. Links Road will provide access to the staff car park, which will itself generate some 46 additional trips in each peak hour, along with the occasional service and refuse vehicles. Whilst this is an increase above existing usage, given the low levels of existing traffic it is not considered that this would have a significantly detrimental impact on Links Road, and it is not considered that this would result in any safety issues.

- *The effectiveness of existing traffic and parking controls in managing school related traffic along Cheriton Road;*

It is identified that there is already significant parking control in Cheriton Road.

The existing parking control consists of 415 metres of on street parking bays which are in force from Monday to Saturday and allow two hours of stay except for 'K' permit holders. The applicant notes that parents generally observed parking controls in the area including the school 'keep clear' markings and bus stops. Only one parent was observed to block a residents driveway during site surveys, although they remained in their car at that time (and could have moved if required).

Hampshire County Council officers have visited Cheriton Road on a number of occasions to observe parent drop of and pick up activity. Whilst it is clear that the presence of the schools generates traffic and parking demand on local roads, this has generally been observed to function well. It is clear that there is available parking in the road at present. However, it is considered that when the additional car parking demand generated by the proposal is considered, it is unlikely there will be sufficient parking capacity on Cheriton Road to fully accommodate the demand for extra drop-off created by the proposed school. As such, and in response to these concerns, the plans now propose the introduction of a parking area on the eastern side of Chilbolton Avenue. This provision is within a reasonable walking distance of the site (accessed by Links Road and the existing footpath), and provides additional parking capacity (for some 40 cars) to accommodate the additional travel demand. This will offer parents an alternative to the use of Cheriton Road, and will help to alleviate and mitigate the pressure for parking on local roads at school times. This proposal is supported, and considered necessary to support the expansion of the school. The parking provision should be provided prior to occupation of the primary school, and should be managed through the Travel Plan.

At present there are parking restrictions which limit car parking between 8am and 6pm that prevent pick up and drop off of children on Chilbolton Avenue. This will need to be amended as part of the delivery of the parking area. A condition should be attached to any consent to require the delivery of the parking area on Chilbolton Avenue.

In order to help identify and fully quantify parking availability on Cheriton Road parking beat surveys have been carried out. A parking survey was carried out over three days in February, covering an area within an approximate walking time of five minutes to the school. The survey recorded parking occupation/availability every five minutes during the school drop off (0820-0910) and pick up (1450-1540) times.

The results have been presented showing both the 'worst case', i.e. the maximum occupancy rates recorded during any one of the three survey days; and an 'average case', showing the average occupancy rates recorded over the three days.

A comparison was then carried out of the number of available spaces and the demand for parking generated by the proposals, based on the agreed car mode split for the school. The provision of approximately 30 spaces on Chilbolton Avenue were included in the comparison.

The greatest demand for parking arises in the pick up period when an additional 65 cars will be parking. The analysis shows that even taking the maximum current parking occupancy rates recorded on local roads over the three days, there will be sufficient parking available for the additional demand.

The survey has confirmed the availability of parking and that, with additional parking provided on Chilbolton Avenue, there will be sufficient parking capacity to accommodate the future demand that will be generated by the proposals.

It is considered that based upon the evidence submitted, and subject to the principle that school hours will be staggered and that the parking area on Chilbolton Avenue will be delivered, that the travel demands associated with the proposals can be suitably managed. The applicant states that if on-street parking issues arise, further measures can be considered through the travel plan.

- *Location for the additional pinch point on Cheriton Road;*

The location of the proposed pinch point on Cheriton Road was chosen because it was the only available place north of Green Lane whereby it would not interfere with existing bus stops or residents driveways. Further swept path analysis has been provided to demonstrate that vehicles can safely negotiate the pinch point. This is considered satisfactory.

- *Deliveries at the proposed car park on Cheriton Road;*

Any servicing vehicle will only be permitted to enter the car park and turn around if there are free car parking spaces, so the majority of deliveries to this car park will be restricted to outside of school opening hours.

- *Supporting information on the dwell time for primary age pupil drop off;*

Further work has been undertaken to refine the parking demand for pupils. The higher car mode share of 23% has been applied to the pupil numbers resulting in the total number of pupils travelling to school by car increasing from 58 to 97. This is considered to be a better reflection of the travel

characteristics for the proposed school catchment area. Some of the pupils will stay on at after school clubs or have siblings attending the adjacent school. There will also be a proportion of parents with children in years 4-6 who would not arrive in advance of the school closing time. On this basis the applicant forecasts that the additional parking demand would be 65 during the afternoon pick up period.

During the morning drop off it is anticipated that demand for parking will be slightly lower, based on dwell times of 10 minutes per car on average. This is considered robust as some parents will be parked for longer whilst parents of older pupils will have a very short dwell time. This equates to additional parking demand for 41 vehicles.

It has been established that with the additional Chilbolton Avenue parking spaces provided, there are approximately 100 parking spaces within a reasonable walking distance of the school. On site observations have identified that the majority of these spaces will be available following the school peak period for Westgate. There will be an element of overlap with parents from Western C of E Primary School, but the additional spaces on Chilbolton Avenue together with existing capacity on Cheriton Road and Fordington Avenue will provide sufficient capacity for parking within a reasonable walking distance to the school.

- *Consistency with the draft framework school travel plan;*

The applicant has stated that Westgate School would be keen to introduce a bus service for pupils travelling from less accessible locations within the catchment such as Abbotts Barton. This should be included in the Travel Plan, and explored should the demand be generated.

As mentioned staff parking is intended to be restricted to staff by the issuing of entry passes. The School Travel Plan should clarify the responsibility of delivering and administering the car park. The Travel Plan should be updated to include further measures to ensure school parking is managed across the whole site. This should include the management of tandem parking.

As previously mentioned, if on-street parking is considered an issue in the future, then measures will be brought forward through the travel plan to mitigate this as necessary. It should be clarified what these measures are and the Travel Plan updated accordingly.

A condition to require the updating of the Travel Plan to include these matters should be attached to any planning consent.

- *The impacts of greater pedestrian and vehicle flows at the Cheriton Road/Bereweke Road/Stockbridge Road mini roundabout junction.*

It has been acknowledged by the applicant that there will be an impact of the proposals on the above junction, as a result of more cars and pedestrians using this junction. Whilst this junction is busy, and occasional peak period congestion arises, it is not considered that the proposal will result in a severe traffic impact at this junction. Following site observations, no blocking of the roundabout took place during afternoon pick up time.

Further, it is clear that the zebra crossing is on the pedestrian desire line. The potential movement of the crossing was considered but dismissed due to the detrimental impact that this would have on the pedestrian desire line.

Summary

It is clear that the development of a primary school in this location will increase travel demand to the area, and place greater pressure on local roads, particularly Cheriton Road. The assessment has identified that, in the absence of mitigation, this is likely to result in significant additional parking pressure on Cheriton Road during peak periods, particularly school pick up times.

The applicant has however proposed a series of measures in order to mitigate the impact of the development. These measures include the introduction of a parking area on Chilbolton Avenue, the staggering of school opening hours, and the implementation of a Travel Plan.

The proposals now include additional on-site parking for staff, and the level of parking provided significantly exceeds the County Council's existing standards, meeting fully the emerging advice emanating from the school parking review.

The site is well located in the urban area, and offers adequate opportunities to travel by modes alternative to the car. These opportunities will be promoted and enhanced through the Travel Plan.

It is considered that overall, whilst there will be a traffic impact arising from the development, this impact can be mitigated and managed through the measures identified, so that there is no residual significant transport impact of the proposals.

- 5.5. **Sport England** raise no objection to the proposal to build a new 420 place two form entry primary school on the school site. However, they raise objection to the planning application in relation to the reduction in the proximity of car parking provision at the badminton centre and is seeking a change to the parking arrangements/landscaping.

5.6. **Natural England** has been consulted but no comments received.

6. **Representations**

6.1. Winchester City Councillors Councillor Robert Hutchinson and Ray Pearce have raised the following objections:

“While the architecture of the new school buildings is of a high standard – irresponsibly inadequate attention has been given to the traffic, transport and safety issues arising from 420 new primary pupils attending the expanded Westgate School; and the proposed relocation of the nursery school. Planning permission for the new school buildings should be withheld until there is a clear plan, with timetable and budget, for investing in transport infrastructure in the vicinity of the school in order to create a safer environment around the school with new measures to reduce congestion and increase safety in and around Cheriton Road and to make it easier for the majority of the 4-16 year old pupils to walk for some or all of their journey to school or – for the older pupils – to cycle.

The current planning application is not in accordance with paragraph 35 of the **National Planning Policy Framework (NPPF)** that ‘*plans should protect and exploit opportunities for the use of sustainable transport modes ...[and] should be ...designed where practical to give priority to pedestrian and cycle movements*’. Nor is it in accordance with Policy T5 in the **Winchester District Local Plan Review (2006)** or CP21 in the **Winchester District Local Plan Part 1 – Joint Core Strategy**. The creation of 420 new school places is a major development and the planning application currently itemizes little or no investment in off-site highway improvements including new and improved pedestrian and cycling facilities. In addition the application is not in accordance with the **West Fulford & Orams Arbour Neighbourhood Design Statement (NDS)**, published in 2008.”

6.2. As of 15 May 2013, 101 letters of objection have been received from local residents and interested parties. These letters have all raised objection with regard to a broad range of issues. The topics are presented below in summary form.

Highways

- (a) the pick up/drop off figures are based on the wrong assumptions and these periods of peak traffic will be made worse;
- (b) the proposed staggered hours will not ease the situation and will make the busy period stretch out longer;
- (c) as the pupil catchment is much wider, it will increase the amount of cars used to transport the children to the school and has not been taken into account;
- (d) buses are under utilised and the location of the bus stops make the congestion at peak times worse and dangerous for road crossing;

- (e) Park and Ride should be made mandatory for all employees at the school to reduce parking demand the number of cars arriving in the area and reduce car emissions;
- (f) general congestion in the local road network will increase significantly due to increased traffic;
- (g) congestion on Links Road will increase due to new car park and increased car traffic;
- (h) the 'Poets Estate' will be used even more for parking and suffer congestion;
- (i) danger to cyclists/walkers will increase as it is already unsafe for pedestrians and bike users and the increase in traffic and parked cars will make it worse;
- (j) sustainable travel modes cannot be relied upon to be an alternative to the car use as cycle/pedestrian unlikely and impaired due to lack of pavements, safe cycle routes, traffic congestions and dangerous driving;
- (k) Park and Stride should be used to reduce parking demand, the number of cars arriving in the area and reduce car emissions;
- (l) the road improvements as mentioned in the Travel Plan and Transport Assessment are not presented as funded commitments and so should not be taken into account as unlikely to happen;
- (m) the local roads are used as rat runs and are already very busy and dangerous;
- (n) air quality will be reduced by vehicle emissions due to extended waiting times for drop off/pick up and increased volume of cars;
- (o) construction traffic in Links Road will make the current congestion and likelihood of accidents even worse;
- (p) Green Lane access will be restricted and this is unacceptable as it is regarded as a right of way for pedestrians and for vehicular access to the rear of properties on Links Road;
- (q) the revised forecast now refers to the original case (the extra 20 car journeys arising from 58 commuting parents) as the 'most likely' case and a 97 car case as the 'worst case' scenario. The latter then conveniently ties in with the increased number of parking places proposed. But this remains very far from a worst case scenario. It is quite feasible to model a case, based on Hampshire County Council's own pupil location and catchment area analysis, to forecast 194 incremental car journeys – ie twice the consultants' case;
- (r) providing 40 parking spaces along Chilbolton Avenue will not address the problem of parents taking their children to the new school by car. It is most unlikely that parents driving to school will drop their children off in Chilbolton Avenue by choice, unless they are going in that direction anyway. This solution is an attempt to divert the problem. If it is used by parents, it then leads to causing longer car journeys or the very real risk of cars doing U – turns in a busy road, neither of which should be the outcome of a planning application:

- (s) the extra 40 places on Chilbolton Avenue still leaves car parking 0.4 to 0.6 kilometres from the school gate so parents will either continue to use Cheriton Road or need to accompany their 5-11 year old children from the car. This would suggest long dwell times for parked cars. Chilbolton Avenue parking is an inherently unsafe proposal with parking on one side of the road only (Hampshire County Council refers to lay-by but it's misleading to suggest this parking space is protected in any way from passing traffic). People will drive from one side of the road to the other and conduct u-turns rather than proceed to the congested roundabouts at each end. Also opening car doors into oncoming streams of traffic/cyclists is potentially dangerous. In any event the parking proposal requires a Traffic Regulation Order and is not a 'given';
- (t) the impact of the nursery continues to be ignored on the basis there is no change in provision. But with a roll of more than 55, there will be even more traffic to cope with on Cheriton Road as the opportunity to park in Green Lane/Links Road will no longer exist. Parents of nursery children will require dedicated parking on the school side of the road to allow 15 minutes for drop-off/collection; and
- (u) the threat remains that Westgate school will still try and seek its closure post any planning approval – simple review of the plans shows the impracticality of having two schools split by this road. Green Lane must be preserved for public access at all times.

Parking

- (a) badminton club object to the loss of parking immediately outside the sports hall/badminton club facility. Walking to the other car parks within the site could be dangerous at night. How will access be managed to these car parks to ensure member convenience and prevent queues forming. Restriction of use of Green Lane by a gate is not acceptable;
- (b) the car park on-site in Cheriton Road has bad sight lines and so will cause a danger for cars and pedestrians using this section of road. It could result in noise/anti-social behaviour and pose a security risk if not managed properly;
- (c) the car park in site on Links Road will increase congestion in Links Road due to parents and service vehicles. It will cause light pollution to the neighbours. It will change the appearance and character of this area of the neighbourhood from semi-rural to urban. A barrier/gate could result in vehicles not being able to access car park and so cause blockages on the road;
- (d) car parking standards have been exceeded, which does not promote a sustainable message and sets a bad example;
- (e) Cheriton Road does not have enough car parking space for non-residents and so people already park illegally, across driveways and in the neighbouring roads causing disturbance;

- (f) outside school hours community use of car parks can encourage noise/anti-social behaviour and pose a security risk if not managed properly; and
- (g) there should be liaison between the school and neighbours regarding the use and management of the car parks to prevent adverse amenity impacts.

Landscape

- (a) the introduction of new parking areas will alter the look and character of the site;
- (b) an area of hedgerow should not be lost as this is part of the established boundary and contributes to the local character; and
- (c) the proposal is fundamentally an overdevelopment of the site and will result in a lack of space.

Visual Impact

- (a) the boundary characterised by mature trees, hedging and green space will be altered to a more urban scene with the nursery dominating the Cheriton Road aspect;
- (b) within the site the creating of the parking area accessed by Links Road will alter the semi-rural nature of the road; and
- (c) removal of five lime trees.

Noise

- (a) the new primary school will create more noise than the previous use; and
- (b) the relocated nursery will create noise disturbance to residents in this area.

Drainage

- (a) the site would not be able to cope with the extra sewage and waste water, as planning was denied in 2007 (planning application no: 07/00875/ful) to a site nearly opposite the proposed nursery due to the main drainage system in the road.

Ecology

- (a) there is a wildlife area adjacent to car park E which will be adversely affected; and
- (b) an area of hedgerow should not be lost as these are protected and have wildlife value.

Planning Policy

- (a) proposal in conflict with National Planning Policy Framework, Section 4, paras 29-41. "Promoting sustainable transport" AND Education provision;
- (b) the proposal is premature as the school has not been put forward in the Winchester District Local Plan Review (adopted 2006). It should be decided through the local plan procedure. It is contrary to saved transport policies T2, T4 & T4;
- (c) West Fulflood and Oram's Arbour Neighbourhood Design Statement (adopted 15 May 2008) presents the area as "An area of large houses and gardens, which retains the character of its rural and early suburban origins." Planning Guidance point 43 states that "Additional traffic strain should not be placed on the bend of Cheriton Road, at the junction with Cheriton Close, the mini roundabout at the junction with Stockbridge Road and on Cheriton Road near the Westgate School where traffic congestion causes problems at the beginning and end of the school day. (T4)";
- (d) Barton Farm housing development has been agreed and will have a primary school within that area. This proposal is unnecessary as the extra children could be accommodated within the new Barton Farm primary school;
- (e) Winchester City Council has adopted a new plan in March 2013. This development falls foul of its stated traffic/pollution/development objectives.

Education provision

- (a) this proposal will reduce the academic capability of the existing school and impair the teaching standards for the primary. An 'all thorough school' has no successful precedent;
- (b) there is not enough space for the number of children proposed. The secondary school is expanding its roll from 1,081 to 1,200 pupils. This means that if the proposed development goes ahead, 2,100 pupils will be on the combined site (Westgate Secondary 1,200, Westgate Primary 420, Westgate Nursery 55, Western Primary 420). It is estimated some 28% of Winchester's children will be educated on this combined site (and the new primary will be less than half the physical size of Western). Furthermore pupils will be losing important recreational space that is currently used intensively at breaks whilst having to schedule 54 classes for individual sports/games activities on a restricted site.;
- (c) the proposal will compromise the viability of Western Primary School; and
- (d) where else in the UK have two schools been established within 100 yards of each other competing for the same pupils? Western is substantially under-subscribed this year. Peak demand for local school places has passed and there is inadequate data to support migration from London becoming a structural shift in population

movement. The increase in pupil places needed can be met by expansion of the existing primary schools and avoid the pollution/transport impacts arising from the concentration of supply on one location that will only be filled by car-borne children from out of area.

Security

- (a) a footpath to the rear of Fordington Avenue will allow vandalism to neighbour's property and could encourage burglaries; and
- (b) a footpath to the rear of Fordington Avenue would be useful as it would improve accessible routes and reduce the conflict between cars and pedestrians/cycle users.

Consultation

- (a) there was a lack of consultation by the school/Council pre submission of the planning application; and
- (b) the scope of the consultation seemed to only involve parents of pupils, not local residents.

7. Commentary

- 7.1. It is acknowledged that there have been objection to this proposal from a large number of local residents, the local Councillors and Winchester City Council. The main cause for concern is the increase in traffic that the primary school would bring to the area, the associated parking need and the impacts to the residents. There have been criticisms of the Transport Assessment and the Travel Plan (as detailed in the Representations section of this report). The assumptions and statistics in these transport reports have been reviewed by the Highways Authority. As a consequence further information has been provided by the applicant and an amended Travel Plan and Transport Assessment addendums have been submitted.
- 7.2. When considering the additional impact on the local highway network, the number of anticipated journeys has been increased to reflect the wider catchment area and a more realistic proportion of parents choosing to drive to the school and longer dwell times during drop off/pick up. These calculations also take into account the accepted methods of calculating modal transport methods and available data. The capacity of the local roads to accept traffic and the parking availability has been compared to the higher figures. It is the opinion of the Highways Authority that the local road network capacity, with additional parking spaces along Chilbolton Avenue for the purpose of a 'Park & Stride' facility, will be able to absorb the greater number of car trips, without significant adverse transport impacts to the local road network. In part this is due to the proposed staggering of school hours, together with road improvements, as this is likely to be sufficient to enable trips associated with one school to disperse before trips associated with the other school arrive. Therefore the proposal

is in compliance with the West Fulflood and Oram's Arbour Neighbourhood Design Statement Planning Guidance point 43, which states that "Additional traffic strain should not be placed on the bend of Cheriton Road, at the junction with Cheriton Close, the mini roundabout at the junction with Stockbridge Road and on Cheriton Road near the Westgate school where traffic congestion causes problems at the beginning and end of the school day. (T4)"

- 7.3. There are sufficient car parking spaces for the anticipated number of additional and existing cars (parent/visitor), when the parking at Chilbolton Avenue is added to that available on the local roads. The 'Park & Stride' option from Chilbolton Avenue, and associated bus stop has the added benefits of reducing congestion and car emissions in the Cheriton Road area, as well as meeting car parking demand. Teacher parking will be provided on site and will be sufficient to meet the parking demands of the school. The on-site car parking provision is in line with the County Council's standards (Hampshire County Council staff parking strategy) and is appropriate for the development. In light of this, the proposal is in accordance with saved Policy T.2 (Development Access) and saved Policy T.4 (Parking Standards).
- 7.4. The Badminton Association has objected as 22 car parking spaces will be relocated from immediately outside the sports facility to elsewhere within the site. Sport England have objected on their behalf raising concerns over parking, whilst emphasising they have no objection to the proposed primary school. However, there are 19, plus three accessible, parking spaces remaining immediately outside the sports hall/badminton centre. These spaces are expected to be more than adequate for the normal use of the badminton courts. Tournaments may require more spaces due to high volumes of players and spectators, but these spaces are still available within the school site. Since the application has been submitted the applicant has confirmed that there will be no gate across Green Lane and the badminton centre will have full access to all car parks (as seen on plan P09788-A.021 Rev C). Also, in order to meet the needs of the proposed new primary school and nursery, car parking accommodated on the Westgate site will be significantly increased. These extra spaces will be available for use by the badminton centre on the same basis as currently exists. As access to and control of the sports hall and associated facilities by the badminton centre is after school hours in the evenings, weekends and school holidays; there will be no conflict of parking between this community use and the teaching staff. New pedestrian paths will be constructed from the car parks to the badminton centre and these will be lit with low level bollard lighting for use after dark, ensuring on site safety for all users of the school campus. Consequently it is the opinion of the Local Planning Authority there is no significant adverse impact to the badminton centre and its users.
- 7.5. As the visitor and parent car parking is expected to be accommodated within the local road network and the park and stride facility at Chilbolton

Avenue, the development would not cause road amenity or safety issues as the cars will not need to park across residents' drives or on yellow lines. This will retain clear lines of sight and the Chilbolton Avenue parking and other improvements (patrol crossing, 'build out', path widening), will reduce the potential conflict of vehicles and pedestrians/cyclists. Road safety for people on foot or cycling will not be reduced. These road improvements as detailed earlier in the report, are part of the proposed development with sufficient funding to bring them forward. Therefore it is considered that the proposal will be in accordance with saved Policy T.3 (Development Layout).

- 7.6. In terms of the development linking to cycle paths or providing them, it is acknowledged that there may be a lack of designated cycle ways in this area. However, as the application is essentially for a primary school on an existing site, in a built-up area within the Winchester City district, it is reasonable to regard the site as a sustainable location that makes use of the existing infrastructure. In addition, there are suitable access routes that are used by existing children to reach Westgate and Western C of E Primary School, so the younger children will have the option to walk if they are within a reasonable distance (see plan P09788-A.033). The additional road improvements will also encourage more sustainable travel by the existing and future pupils, as sought in Policy CP10 (Transport). For clarity, there is not a footpath proposed along the back of the gardens of Fordington Avenue.
- 7.7. It has been suggested that the school require all teachers to commit to park and ride as a sustainable transport solution and so the amount of parking should be substantially reduced on site; and so the proposal is at present in conflict with the NPPF, Section 4, paragraph 39. However, this policy refers to "setting local parking standards", rather than the application of the standards. None the less, the appropriate parking standard has been met, so that it can take into account all factors with particular reference to the "type, mix and use of development"; as guided by the NPPF. Whilst the Local Planning Authority seeks to encourage the reduction of car use, the proposal seeks to cater for the likely scenario that most primary teachers will want to drive to the site if they do not live close by. This is to prevent overspill onto local roads, which could create issues for local residents. Therefore, it is acceptable to provide onsite parking that reflects the demand. With regard to air quality, the drop off parking at Chilbolton Avenue will assist in reducing the number of vehicular and pedestrian movements in Cheriton Road and so will also lessen the vehicle emissions in the immediate area.
- 7.8. In addition to the Winchester Joint Core Strategy on transport, the NPPF, Section 4, paragraphs 29-41 "Promoting Sustainable Transport" also needs to be taken into consideration when determining this proposal. In particular, paragraph 32 requires that "developments that generate significant amounts of movement provide a Transport Assessment, which should consider whether or not the opportunities for sustainable transport

modes have been taken up depending on the nature and location of the site, safe and suitable access to the site can be achieved for all people and improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development". As it is considered that the proposal and the Transport Assessment have fully explored sustainable modes of transport within the existing constraints of the site and area, and demonstrated there will not be a significant adverse impact on the local highway safety or amenity, the proposal is in accordance with the NPPF which advises that "development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."

- 7.9. Potential problems arising from the car parks themselves have been raised as a concern by residents, but the school will actively manage these to prevent cars queuing in the roads or the areas being used for anti-social behaviour. During the day on weekdays the gated car parks will be used and controlled by school staff. On evenings, weekends and school holidays the car parks will be controlled by the school or the badminton centre for out of hours use. Outside these times the intention is the car park will be locked. In general the Westgate School is intending to arrange for school deliveries to be brought to a holding place central to the campus off Green Lane so the potential traffic impact of large delivery vehicles on Links Road would be reduced.
- 7.10. There have been concerns that the car parks will also generate light pollution to the nearby residents. However, the lighting within the car park will be designed to minimise any light pollution. The lighting columns would be four metres high, to match the height of columns used on site already, and it is intended that the car park will only be lit at required times. Light columns installed near the site boundary will face towards the car park and be fitted with shields to mitigate any backward spill of light.
- 7.11. As mentioned above, there has been concern from the Badminton Association and local residents that Green Lane and the car parks, would be restricted in some way through this proposal. However, the current planning application does not propose to gate, close or restrict access along Green Lane.
- 7.12. There have been objections that the proposal will be an over development of the site and result in a lack of space for the children and a loss of character for the neighbourhood, contrary to the West Fulford and Oram's Arbour Neighbourhood Design Statement which presents the area as "an area of large houses and gardens, which retains the character of its rural and early suburban origins." However, it is considered that the proposal is not an over development of the site as it will fit comfortably within the site and the boundaries will remain mostly unchanged. The scale and massing are appropriate when compared to the existing school buildings and the proposal develops the site as an integrated campus, arranged around a new central landscaped space.

- 7.13. The proposed central space will offer outside learning and recreational uses. The new primary school will also look onto a new landscaped area which will be used by all parts of the school on occasion. This enhanced area will comprise of a public space to the north in front of the primary school and a play space to the south. A fully sized netball court will be provided and an upper grass 'meadow' with adventure play trail and gardening areas will be accessible from this court. The primary school will have use of the large sports field and other outdoor areas within the Westgate site. The positioning and arrangement of the new primary accommodation on the Rotherly site has been designed to minimise tree loss and avoid root protection zones, so many of the existing trees and plants will remain. There are some lime trees which are to be removed within the site, along Green Lane, but these will not alter the line of trees and are not in the best condition as they are cramped in their current location.
- 7.14. It is acknowledged that to the east of Rotherly House, extra planting for screening purposes is needed behind the neighbouring properties of Orchard End and Alder House. The Victorian character of Rotherly House and garden allows a non native mix of shrubs and trees, and therefore the addition of some specimen evergreen species would not alter its current character and would mitigate the impact of the school and car park to the east. The play area to the south of the primary school allows for mature trees to remain. A significant part of the car park's area will be built on the footprint of the existing service yard and cottage that border Links Road. Overall these measures would minimise encroachment into the green space and help retain the character of the Rotherly site.
- 7.15. Specifically, the car park at Links Road has given rise to concern that it will change the appearance and character of the road from semi-rural to urban. However, the car park will be sensitively landscaped and surrounded with hedges and planting on all four sides. The outer boundaries of brick wall and fence are not expected to change. The main view that will alter will only be that of the entrance gates. These will be opposite the vehicular access on the built road at Walnut Grove, and so are considered an acceptable minor change
- 7.16. The location of the car park to the south east of the main site, with access off Cheriton Road, has also caused some concern as it would change this open grassy area into a car park. However, this area will also be planted all around and cannot be viewed from the public realm clearly except from the access point. The loss of a small length of hedgerow to make this access is acceptable as it has little biodiversity value or potential and is viewed as a minor alteration. Also, a new beech hedgerow along the top of the bank on the southern border is recommended to reduce the visual impact for those houses which abut the site, as during winter months the views from houses may be clearer. A condition to require a detailed landscaping scheme for hard and soft elements is attached to secure these improvements.

- 7.17. The new nursery will not have a detrimental effect on the character of the area. It is to be a single story building with sympathetic external materials of brick and plain tile. It would be set back from the boundary of the site and would be screened in part from the existing boundary wall. It is regarded as part of the school campus buildings, and will not be overbearing or stand out as to cause any significant visual impact on the street scene. In support the Neighbourhood Plan states that “as there are two large schools and a university campus in the area, the open spaces and network of footpaths are particularly well used. The character of the area is changing, as many of the large family houses and gardens are developed for additional housing.” This statement suggests a blend of residential and non-residential buildings within the area, so an additional low level additional building within this context would not be out of place.
- 7.18. Overall it is considered that the majority of the development is located within the context of the school site and many existing features of value will be retained. In addition, existing and new pupils alike will benefit from the improved layout of the campus and attractive outdoor spaces. The elements of the proposal that are outward facing are in keeping with the mixed use of the area, and will not have a significant impact on the street scene. Therefore, the character of the school and the neighbourhood will not be harmed by the proposal, in accordance with Policy CP13 (High Quality Design), saved Policies DP.3 (General Design Criteria) and Policy DP.4 (Landscape and the Built Environment).
- 7.19. There have been objections that the proposal will cause noise disturbance for the neighbours, due to the relocation of the nursery and the increase in pupils. However, the nearest neighbours to the nursery are across Cheriton Road, so is not considered that the nursery will increase noise disturbance for these residents. Similarly, the addition of primary school pupils to the site is not seen as increasing noise disturbance, when taken in context of the impact of the existing school. Therefore there is no significant impact on neighbour amenity in this regard and so the proposal is in accordance with saved Policy DP.3.
- 7.20. The capability of the local drainage network and foul sewage provision on site to cope with the demands of the proposal, has been questioned as a previous application for housing in the vicinity was refused with reference to drainage. In response, this issue has been further checked against the information supplied by the applicant. It is understood that there would be a reduction in foul discharge as a result of this proposal. As part of the application process the Environment Agency was consulted and they had no objection to this proposal. In light of the above information, it is concluded that the proposal would not create any environmental issues for surface flooding or sewage disruption.
- 7.21. In response to concerns that a ‘wildlife area’ adjacent to the property St Anne’s would be adversely affected, all natural elements have been considered appropriately by the applicant and the area will not be harmed. Whilst it is accepted that there is some potential for reptiles and plants

within the whole site that are of ecological and naturalist interest, there are no protected species, other than the bats at Rotherly House, or designated areas identified. Bat surveys identified large concentrations of bat droppings, believed to be those of serotine bats, in the loft of Rotherly House. Emergence surveys were carried out in September 2012 but no bats were seen, most likely due to the timing of the surveys outside the optimum period of mid-May to August. Bats are protected under UK law via the Wildlife and Countryside Act 1981 (as amended) and under EU law by the Habitats Directive, which is transposed into UK law by the Conservation of Habitats and Species Regulations 2010 (as amended) (commonly referred to as the Habitats Regulations). Planning Authorities are required to engage with the Regulations. The applicant has submitted a detailed method statement that sets out how work will proceed in order to avoid impacts to bats (i.e. killing, injury, disturbance of bats and damage or destruction of the roost) and it is considered that if the Method Statement is followed then the development is unlikely to result in an offence against the Conservation of Habitats and Species Regulations 2010 (as amended). Improvements and enhancements to biodiversity are included in the recommended conditions.

- 7.22. It has been suggested that this proposal is premature and the provision of a primary school should be met through the local plan process. However this proposal is to meet the 'basic need' pressures that already exist and need to be addressed. It has also been suggested that the proposed primary school at Barton Farm could be used to meet the demand. However this proposed two form entry primary school at Barton Farm is needed to cater for the children that will be generated by that development, and will not provide for the places required to meet the general population growth.
- 7.23. In conclusion, there were a number of issues which have been considered and further investigated to satisfy the Local Planning Authority that the proposal would be acceptable and in accordance with national and local policy. It is appreciated that the application has raised a lot of concern and it is right that the issues raised by the public should be properly scrutinised. However, all the evidence, including advice from consultees and policy guidance, does not support any planning grounds for refusal of permission as the proposal is acceptable within the context of an existing school site and will not have significant residual transport impacts.
- 7.24. Subject to the additional highways improvements being completed, the proposal is acceptable in terms of highway safety and convenience and it is in a sustainable location to minimise travel by car (Policy CP10 of Winchester District Local Plan Part 1 – Joint Core Strategy [adopted 2013] and saved Policy T.3 of The Winchester District Local Plan Review [adopted 2006]). The proposal will not interfere with the safety, function or character of the local road network (saved Policy T.2). The on-site car parking provision is appropriate for the development (saved Policy T.4).

- 7.25. The design, appearance and proposed materials are in keeping with the site context (Policy CP14 and saved Policy DP.3) and the proposed soft and hard landscaping will ensure the development fits with the landscape character of the area and it will not cause any loss of amenity (Policy CP13 and saved Policy DP.4).
- 7.26. The development will appropriately mitigate against any impact to the bats within the site (Policy CP16), not result in any increased flood risk (Policy CP17) and protect any archaeological interests (Policy CP20 and saved Policy HE.1).
- 7.27. The development would meet the immediate needs of the local community by providing a sufficient choice of school places as required by paragraph 72 of the National Planning Policy Framework (published 27 March 2012), and Policy CP6 (Local Services and Facilities).

8. Recommendation

- 8.1. That planning permission to expand the existing secondary school with a 420 place two form entry primary school, making an 'All Through' education provision, proposals include the reprovision of a 55 place nursery unit which is to be retained on site, additional car parking and landscaping, part demolition of an existing boarding house and annexed nursery unit is required to facilitate the proposal at The Westgate School and Rotherly House, Cheriton Road, Winchester, Hampshire SO22 5AZ (12/02659/HCS) be granted subject to the conditions listed in Integral Appendix B.

CORPORATE OR LEGAL INFORMATION:**Links to the Corporate Strategy**

Hampshire safer and more secure for all:	no
Corporate Improvement plan link number (if appropriate):	
Maximising well-being:	yes
Corporate Improvement plan link number (if appropriate):	
Enhancing our quality of place:	yes
Corporate Improvement plan link number (if appropriate):	

Section 100 D - Local Government Act 1972 - background documents

The following documents discuss facts or matters on which this report, or an important part of it, is based and have been relied upon to a material extent in the preparation of this report. (NB: the list excludes published works and any documents which disclose exempt or confidential information as defined in the Act.)

DocumentLocation

Expand the existing secondary school with a 420 place two form entry primary school, making an 'All Through' education provision, proposals include the reprovision of a 55 place nursery unit which is to be retained on site, additional car parking and landscaping are also included within the proposals, part demolition of an existing boarding house and annexed nursery unit is required to facilitate the proposal at The Westgate School and Rotherly House, Cheriton Road, Winchester, Hampshire SO22 5AZ (Application No: 12/02659/HCS) (Site Ref: WRE006)

Elizabeth II Court West, The Castle, Winchester, SO23 8UD.

CONDITIONS

Plans and Particulars

1. The development hereby permitted shall be carried out and completed strictly in accordance with the approved plans, specifications and written particulars identified within the decision notice.

Reason: To ensure that the development is carried out in accordance with the approved details.

Time Limits

2. The development hereby permitted shall be begun before the expiration of three years from the date on which this planning permission was granted.

Reason: To comply with Section 91(as amended) of the Town and Country Planning Act 1990.

Hours of Working

3. There shall be no access to the development site by any traffic associated with the construction/demolition (ie. no delivery vehicles, no contractors' cars, nor plant and machinery) in the morning between 0830 and 0915; and in the afternoon between 1515 and 1545.

Reason: In the interests of public safety, to avoid traffic conflict at the times of the day when pupils are arriving at and departing from school.

4. No work relating to the construction of the development approved, including works of preparation prior to operations, the delivery of construction materials, skips or machinery, nor the removal of waste materials, shall take place before the 0800 or after 1800 Monday to Friday inclusive, before 0800 or after 1400 on Saturday and not at all on Sunday or recognised public holidays.

Reason: To protect the amenities of occupiers of nearby properties.

Materials

5. Samples and/or details of the materials and finishes to be used for the external walls and roofs of the proposed buildings shall be submitted to and approved by the Local Planning Authority in writing before the development commences.

Reason: In the interests of visual amenity and to secure a satisfactory development.

Highways

6. A construction Traffic Management Plan, including lorry routes, parking and turning provision to be made on site, measures to prevent mud from being deposited on the highway and a programme for construction shall be submitted to and approved by the Local Planning Authority in writing before development commences. The agreed details shall be fully implemented before the development is commenced.

Reason: In the interests of highway safety

7. Highway works at Chilbolton Avenue to provide a drop off/pick up point and the improvements to the footpath to connect Western and Westgate schools, shall be completed to the written satisfaction of the Local Planning Authority before occupation of the new primary school and nursery at Westgate school.

Reason: In the interests of highway amenity for residents of the local highway network.

8. The development hereby approved shall not be occupied until the School Travel Plan has been updated to include arrangements for the management of the school parking areas. The approved Travel Plan shall be implemented thereafter.

Reason: In the interests of on site safety

9. An agreement to stagger the hours of the schools (inclusive of the nursery) within the Westgate site and Western Primary shall be submitted to and approved by the Local Planning Authority in writing before development is occupied.

Reason: In the interests of highway safety.

10. The car park accessed from Cheriton Road shall not be used for any vehicles larger than 4.710 metres in length, unless the appropriate highway information (i.e. swept path analysis) has been submitted to the Local Planning Authority and approved in writing.

Reason: In the interests of highway safety.

11. The development hereby approved shall not be occupied until the School Travel Plan has been updated and includes arrangements for the management of the school parking areas. The approved Travel Plan shall be implemented thereafter.

Reason: In the interests of highway safety.

12. No development hereby permitted shall be occupied until full details of the on-site provision to be made for the parking of cycles and scooters has been

submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented prior to occupation of the school and thereafter retained in good condition for their intended purpose.

Reason: In the interests of highway safety.

Landscaping

13. Within three months of the date of this permission a detailed scheme of landscaping for the site shall be submitted to the Local Planning Authority for approval in writing. The scheme shall specify the types, size and species of all trees and shrubs to be planted; details of all trees to be retained; and details of fencing/enclosure of the site, phasing and timescales for carrying out the works, and provision for future maintenance. Any trees or shrubs which, within a period of five years from the date of planting, die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species. The scheme shall be implemented as approved.

Reason: In the interests of visual amenity.

14. Within three months of the date of this permission a detailed scheme of all the hard and soft landscaped areas, including the proposed car parks, for the site shall be submitted to the Local Planning Authority for approval in writing. The scheme shall be implemented as approved.

Reason: In the interest of visual amenity.

15. The trees and/or hedges to be retained shall be protected during building operations by the erection of protective fencing in strict compliance with the requirements of the Local Planning Authority relating to their protection. The existing trees shall not be lopped, topped, felled or destroyed without the prior approval in writing of the Local Planning Authority.

Reason: To ensure the enhancement of the development by the retention of natural features.

Nature Conservation

16. Development shall proceed in accordance with the method of site clearance with respect to reptiles as set out in the 'Recommendations' section of the RPS, 6 December 2012 letter detailing the findings of the Ecological Walkover Survey.

Reason: To avoid killing or injury of reptiles in accordance with the Wildlife and Countryside Act 1981 (as amended).

17. Prior to commencement, a detailed botanical survey and impact assessment of the application site shall be carried out, and a report of the survey

including details of any recommended mitigation measures with respect to botanical interest shall be submitted for written approval to the Local Planning Authority. Development shall subsequently proceed in accordance with any approved mitigation measures.

Reason: To conserve and enhance the botanical interest of the site in accordance with the Natural Environment and Rural Communities Act 2006.

18. Development, including the construction timings, methods and monitoring, shall proceed in accordance with the measures set out in the approved Bat Mitigation Method Statement (February 2013). Thereafter, the bat roost enhancement measures set out on page 8 of the Method Statement shall be permanently retained.

Reason: To avoid impacts to bats and to conserve and enhance biodiversity.

Archaeology

19. Prior to commencement, a programme of archaeological work in accordance with a written scheme of investigation shall be submitted to and approved by the Local Planning Authority. The scheme shall be implemented as approved.

Reason: In the interests of archaeology.

Advice Note

Disturbance of nesting birds is a criminal act under the Wildlife and Countryside Act 1981, so it is recommended that no tree or shrub clearance should be carried out in the bird nesting season (March to August).

In determining this planning application, the Local Planning Authority has worked with the applicant in a positive and proactive manner based on seeking solutions to problems arising in relation to dealing with the planning application by liaising with consultees, respondents and the applicant and discussing changes to the proposal where considered appropriate or necessary. This approach has been taken positively and proactively in accordance with the requirement in the NPPF, as set out in the Town and Country Planning (Development Management Procedure) (England) (Amendment No.2) Order 2012.

*Annexe to Reasons for Conditions
(as required by Article 31 of the Town and Country Planning
(Development Management Procedure) (England) Order 2010)*

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

4 “Promoting sustainable transport”.

Paragraphs 29-41

**8. Promoting healthy communities
Paragraph 72**

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.

**THE WINCHESTER DISTRICT LOCAL PLAN PART 1 - JOINT CORE
STRATEGY (ADOPTED 20 March 2013)**

Policy CP6 - Local Services and Facilities

The Local Planning Authority will support proposals for the development of new, extended or improved facilities and services in accordance with the development strategies set out in Policies WT1, SH1 and MTRA1.

The Local Planning Authority wishes to retain and improve the facilities and services available across the District. Development proposals should not threaten or result in the loss of premises or sites used to provide services and facilities unless it can be demonstrated that:

- the site/premise is not required because the service or facility has been satisfactorily relocated or is no longer needed to serve the locality; and
- the site or building has no reasonable prospect of being used for an alternative service or facility which would benefit the local community. When considering proposals, account will be taken of:
- whether the loss of the service or facility would cause harm for those living within the neighbourhood, settlement, or rural catchment with a reasonable need to access such facilities in the future; and

- whether the loss of the facility would have a detrimental impact upon the overall vitality and viability of the settlement; and
- whether the loss is part of an agreed plan to provide improved local services in equally accessible locations.

Policy CP10 – Transport

The Local Planning Authority will seek to reduce demands on the transport network, manage existing capacity efficiently and secure investment to make necessary improvements. Development should be located and designed to reduce the need to travel. The use of non-car modes particularly walking and cycling should be encouraged through travel plans, management and improvements to the existing network, and improvements to accommodate additional traffic should be undertaken (or funded) where necessary.

Policy CP13 - High Quality Design

New development will be expected to meet the highest standards of design⁵⁰. In order to achieve this all proposals for new development (excluding small domestic applications and changes of use) should demonstrate that:

- an analysis of the constraints and opportunities of the site and its surroundings have informed the principles of design and how the detailed design responds positively to its neighbours and the local context;
- the proposal makes a positive contribution to the local environment and creates an individual place with a distinctive character; the public realm has been designed to ensure that it is attractive, safe, accessible and well connected to its surroundings, including walking and cycling routes to and within the development, to encourage their use;
- the accompanying landscape framework has been developed to enhance both the natural and built environment and maximise the potential to improve local biodiversity;
- measures to minimise carbon emissions and promote renewable energy and reduce impact on climate change form an integral part of the design solutions.

Policy CP14 – The Effective Use of Land

In order to ensure that scarce development land is used effectively, the Local Planning Authority will support higher densities on sites which have good access to facilities and public transport, particularly within the urban areas. The development potential of all sites should be maximised, and will be balanced against the need to promote high quality design. The primary determinant of the acceptability of a scheme will be how well the design responds to the general character of the area.

Policy CP16 – Biodiversity

The Local Planning Authority will support development which maintains, protects and enhances biodiversity across the District, delivering a net gain in biodiversity, and has regard to the following:

- protecting sites of international, European, and national importance, and local nature conservation sites, from inappropriate development.
- supporting habitats that are important to maintain the integrity of European sites.
- new development will be required to show how biodiversity can be retained, protected and enhanced through its design and implementation, for example by designing for wildlife, delivering BAP targets and enhancing Biodiversity Opportunity Areas.
- new development will be required to avoid adverse impacts, or if unavoidable ensure that impacts are appropriately mitigated, with compensation measures used only as a last resort. Development proposals will only be supported if the benefits of the development clearly outweigh the harm to the habitat and/or species.
- maintaining a District wide network of local wildlife sites and corridors to support the integrity of the biodiversity network, prevent fragmentation, and enable biodiversity to respond and adapt to the impacts of climate change.
- supporting and contributing to the targets set out in the District's Biodiversity Action Plan (BAP) for priority habitats and species. Planning proposals that have the potential to affect priority habitats and/or species or sites of geological importance will be required to take account of evidence and relevant assessments or surveys.

Policy CP17 - Flooding, Flood Risk and the Water Environment

The Local Planning Authority will support development which meets all the following criteria:

Avoids flood risk to people and property by:-

- applying a Sequential Test to the location, and the Exception Test if required, and applying the sequential approach at the site level 60;
- managing flood risk from new development to ensure risk is not increased elsewhere and that opportunities to reduce the causes and impacts of flooding within the District through development are taken;
- safeguarding land and designated structures and features from development that is required for current and future flood management;
- including sustainable water management systems such as Sustainable Drainage Systems (SuDS) which should be

designed to meet the relevant standards so as to gain approval by the SuDS Approval Body;

Does not cause unacceptable deterioration to water quality or have an unacceptable impact on water quantity (including drinking water supplies) by:-

- protecting surface water and groundwater through suitable pollution prevention measures;
- using opportunities to improve water quality where possible;
- is located at a sufficient distance from existing wastewater treatment works to allow adequate odour dispersion, or takes appropriate odour control measures.
- ensures that water supply, surface water drainage and wastewater infrastructure to service new development are provided and connect to the nearest point of adequate capacity.

The Local Planning Authority will support the development or expansion of water supply, surface water drainage and wastewater treatment facilities where they are needed to serve existing or new development or in the interests of securing long term supply, provided that the need for such facilities is consistent with other policies such as the development strategy, flood risk, contamination and protection of the natural and built environment.

Policy CP20 - Heritage and Landscape Character

The Local Planning Authority will continue to conserve and enhance the historic environment through the preparation of Conservation Area Appraisals and Management Plans and/or other strategies, and will support new development which recognises, protects and enhances the District's distinctive landscape and heritage assets and their settings. These may be designated or undesignated and include natural and man made assets associated with existing landscape and townscape character, conservation areas, scheduled ancient monuments, historic parks and gardens, listed buildings, historic battlefields and archaeology.

Particular emphasis should be given to conserving:

- recognised built form and designed or natural landscapes that include features and elements of natural beauty, cultural or historic importance;
- local distinctiveness, especially in terms of characteristic materials, trees, built form and layout, tranquillity, sense of place and setting.

WINCHESTER DISTRICT LOCAL PLAN REVIEW (2006)

Saved Policy DP.3 – General design criteria

Development which accords with other relevant policies of this Plan will be permitted, provided it:

- (i) makes efficient and effective use of land or buildings;
- (ii) in terms of design, scale and layout, responds positively to the character, appearance and variety of the local environment;
- (iii) keeps parking provision to a minimum;
- (iv) provides for ease of movement and local 'permeability';
- (v) maximises access to public transport;
- (vi) facilitates the development of adjacent sites;
- (vii) does not have an unacceptable adverse impact on adjoining land, uses of property;
- (viii) includes within the development sufficient amenity and recreational spaces, appropriate to its size, design and function;
- (ix) makes appropriate provision for the storage of refuse and recyclables.

Saved Policy DP.4 – Landscape and the built environment

In order to maintain or enhance the District's townscape and landscape development will not be permitted where it would detract from, or result in the loss of:

- (i) important public views and skyline features, both in the immediate vicinity and long-range, where site analysis identifies these as being of recognised importance;
- (ii) slopes;
- (iii) trees and hedgerows;
- (iv) open areas important to the townscape or the setting of buildings, including Listed Buildings;
- (v) the landscape framework, including those 'key characteristics', landscape and built form strategies listed at Appendix 2;
- (vi) water features, river corridors and other waterside areas;
- (vii) areas of ecological importance.

Proposals in areas with special landscape designations, such as the East Hampshire Area of Outstanding Natural Beauty should, in particular, avoid harm to, and by in sympathy with, both the immediate and wider landscape setting.

Saved Policy DP.5 – Design of amenity open space

In order to ensure an attractive environment, development which accords with other relevant policies of this Plan will be permitted, provided it includes adequate on-site amenity open space which should:

- (i) be of a high standard of design, appropriate to the use and character of the development and its location and reflecting relevant supplementary planning or design guidance;
- (ii) contribute to maintaining or enhancing the visual and environmental character of the area;
- (iii) incorporate appropriate hard landscaping and planting;
- (iv) locate and design car parking areas sensitively;
- (v) include arrangements for the future management and maintenance of all areas

Saved Policy T.2 – Development access

Development that accords with other relevant policies of this Plan, requiring new or improved access, will be permitted provided it does not:

- (i) interfere with the safety, function and character of the road network;
- (ii) have adverse environmental implications and meets the Highway Authority's standards for adoption as public highway.

Direct access onto the Strategic Road Network will only be permitted if the Highway Authority is satisfied that no alternative access is available or appropriate and that the proposals would not adversely affect the function, operation and character of the Strategic Road Network.

Saved Policy T.3 – Development layout

In new development, the site layout should be designed to encourage low vehicles speeds and incorporate requirements for safe and convenient cycle and pedestrian routes, cycle parking and links and access to existing or proposed cycle or pedestrian routes. In larger developments, the layout and access will need to be suitable for the efficient operation of bus services. Suitably located and designed bus stops with shelters will be required.

Saved Policy T.4 – Parking standards

Development that accords with other relevant policies of this Plan will be permitted where it provides parking for cars, motor cycles and pedal cycles and turning facilities as appropriate, in accordance with the relevant standards.

Saved Policy HE.1- Archaeological conservation

Where important archaeological sites, monuments (whether above or below

ground), historic buildings and landscape features, and their settings (as identified and recorded in the Sites & Monuments Record), whether scheduled or not, are affected by development proposals, permission will not be granted for development unless the Local Planning Authority is satisfied that, where appropriate, adequate provision has been made for their preservation in situ and ongoing management, conservation and protection.

Where such preservation is not possible or desirable, the Local Planning Authority will permit development to take place only where satisfactory provision has been made for a programme of archaeological investigation, excavation and recording before, or during, development and for the subsequent publication of any findings, where appropriate.