
Applicant response to Shinfield Parish Council consultation comments on applications 241861 and 241862 (Spencers Wood Primary School)

**WBC Development Team (v3)
November 2024**

Overview – WBC’s School Place Strategy

The Council’s School Places Strategy 24/25 to 29/30 was approved at Executive on 26th September 2024. The strategy is cognisant of the Council’s obligations under S14 of the Education Act and of increasingly constrained Council budgets.

The Strategy identifies that the one area in the borough where there is an emerging shortfall in primary school provision for all age groups is Shinfield, reflecting the impact of housebuilding locally. In view of the likely need for additional capacity, the strategy proposes that, subject to further review, the Council takes steps to create 210 places in Shinfield. The Strategy goes on to identify two such options for creating the additional capacity; comprising either the expansion of the Alder Grove CoE Primary School or a new school on the Spencers Wood Site which could be run as a new school or as a satellite of an existing school.

At this current time the need, options and the project funding are subject to ongoing review, which will be concluded in 2025. It should be borne in mind that birth rates are falling in Wokingham (reflective of a national trend) and the Council must balance the need to meet parental preference with the need to ensure that local school place surpluses do not place undue financial pressure on schools. The Executive therefore resolved that, should the review conclude that additional primary school places are required in Shinfield, a further report should be taken back to Executive to confirm the Council’s proposals for the relevant development.

Currently, under the S106 pertaining to the outline planning permission the Council has secured the land and circa £4m ring fenced for the delivery of a 1 Form Entry Primary School on the site. Both of these factors will of course need to be taken into account in determining which strategy for providing additional capacity in Shinfield presents the best value to the Council moving forward.

The submission of the Reserved Matters application acts to safeguard the planning position of the outline planning consent to enable the Council to continue to consider the Spencers Wood site as an option. Had the reserved matters application not been submitted in July as it was, or in the event that the Reserved Matters Application is refused, the Council would no longer be able to pursue the delivery of the primary school pursuant to the outline planning permission. In those circumstances both the land and the S106 money would revert back to the developer.

The Parish Council's Objections:

1. Failure to mitigate the impact of the development under consent O/2013/0346

Response:

The outline planning permission for the site included consent for a primary school 'up to 3 forms of entry'. The wording of the consent was deliberate in order to allow flexibility on the final size of school.

At the time of the outline application, it was identified that a 1FE primary school would have been sufficient to accommodate the need generated by the residents of the application development. It is nevertheless a fact that the residential development is now largely completed and, in lieu of the delivery of the school on the site thus far, the resident population are currently accommodated at alternative facilities. This will have contributed to identified capacity issues within the Shinfield area.

The Council's strategy for delivering school places over the period 24/25 to 29/30 is set out in the Council's School Places Strategy. As set out in the approved strategy, the proposed 1FE Primary School, if delivered, would be sufficient in scale to address the forecast need for additional capacity within the Shinfield area. In the context of falling rolls within Wokingham, delivery of a school at two- or three-times this magnitude would be unjustifiable and place a substantial strain on the financial position of local schools.

2. Failure to mitigate impact of other developments in Spencers Wood, Three Mile Cross and Swallowfield approved since 2013

Response

The Council's strategy for delivering school places over the period 24/25 to 29/30 is set out in the Council's School Places Strategy. As set out in the approved strategy, the proposed 1FE Primary School on this site, if delivered, would be sufficient in scale to address the forecast need for additional capacity within the Shinfield area. In the context of falling rolls within Wokingham, delivery of a school at two- or three-times this magnitude would be unjustifiable and place a substantial strain on the financial position of local schools.

It should be noted that an option was included in the S106 for the Council to acquire further land (Primary School Land Parcels B and C) from the developer in the event that the Council wanted to meet the needs of a wider

community and construct either a 2 form or 3 form entry school in this location. However, under the terms of the S106 the Council were required to exercise the option within 2 years of the commencement of the development and would have needed to acquire the land from the developer at residential market value. In the event the Council did not exercise the option and the opportunity to do so under the S106 has long since passed.

3. Failure to provide safe sustainable travel routes to the school

Response

The primary school sub-phase is the last sub-phase of the masterplan approved under the outline planning permission. The other sub-phases of development were all designed and approved cognisant of the primary school sub-phase of development. Masterplan wide strategies for safe and sustainable pedestrian and cycle routes have therefore been designed / considered / delivered under those other consents, together with an SDL Transport Strategy including public transport provision. Those matters have already been considered / approved / delivered and do not fall to be reconsidered under the current Reserved Matters application; which merely seeks approval of matters of layout, appearance, scale and landscaping within the red line boundary of the primary school sub-phase of the development.

A number of works to Fullbrook Avenue have been identified by the Council's Highways Planner as necessary to make the development acceptable; including provision of dropped kerbs and tactile paving, the relocation of an existing road sign and the installation of kerbside guard railings. A planning condition can ensure that these works are agreed and delivered prior to the opening of the school.

At this time, there is no evidence to suggest that a controlled pedestrian crossing and/or any other traffic calming measures in the vicinity of the school are necessary. Neither were they considered necessary when the Fullbrook Avenue was designed and delivered; all in the knowledge of the primary school sub phase to follow. The Council can of course re-evaluate that position as and when the development progresses through the detailed design stage, but at this time those additional works have not been identified as necessary and therefore are not included in the proposals.

Construction Traffic Management is not relevant to the Reserved Matters application. Such matters will be submitted for the LPA's approval pursuant to the relevant planning conditions of the outline consent.

4. Failure to design a safe on-site road and parking arrangements

Response

The layout has been reviewed by the Council's Highways Planner who has raised no objection. The proposed layout for on-site vehicle parking and turning areas provides sufficient and safe manoeuvring space for cars and service vehicles. In addition, the school will need to operate a parking and servicing management plan covering the area; such matters which could reasonably be secured and implemented via planning conditions.

5. The building location and massing is incompatible with planning for future increases in capacity

Response

The building layout has been designed such that it could be physically extended to accommodate additional classroom capacity if required at a future date.

It should however be noted that any such future expansion would likely be reliant upon obtaining the parcels of land to the north to accommodate the additional parking requirements and outdoor play space provision that further forms of entry would dictate. As set out above, the Council do not currently have control nor an option on those parcels of land.

It should also be noted that the site sits within the recently extended Detailed Emergency Planning Zone (DEPZ). In this area any proposals that would adversely impact on the AWE Off-Site Emergency Plan will likely be resisted. In this context it is questionable whether any future proposals to significantly increase the capacity of the school would secure planning permission.

Parish Council's Application Specific Comments

1. Failure to design safe on-site road and parking arrangements.

The layout of the on-site roadways and parking arrangements will potentially cause safety issues due to:

- the single vehicular entrance/exit onto Fullbrook Avenue and the 'kidney shaped' turning area, combined with the entry/exit to the car park
- the lack of a one-way system (e.g. that might be encompassed in a horseshoe entrance and exit), and the risk of logjams/conflict between vehicular movements
- there being no highlighted prioritisation of taxi/minibus access for less mobile children

Response

The layout has been reviewed by the Council's Highways Planner who has raised no objection. The proposed layout for on-site vehicle parking and turning areas provides sufficient and safe manoeuvring space for cars and service vehicles. In addition, the school will need to operate a parking and servicing management plan covering the area; such matters which could reasonably be secured and implemented via planning conditions.

2. Blue Light access

The plans do not identify blue light access to the north side of the building, especially if the car park is fully occupied.

Response

Emergency access to the north of the building will be from the car park. These matters will be considered further and developed during the detailed design phase of the development in compliance with Fire Safety: Approved Document B (Building regulation in England covering fire safety matters within and around buildings). Compliance with Building Regulations is a statutory requirement.

3. Biodiversity Net Gain

The plans do not include how a baseline assessment of the site is to be achieved, and it is recommended that the baseline should be based on the site before it was used as a developer establishment location.

Response

The outline planning permission was approved in 2014 and pre-dates the mandatory requirement to provide further bio-diversity information. No such information is therefore required for the Reserved Matters application.

4. Shading

The plans do not identify how immediate shading for young children is to be achieved, particularly the infants whose classrooms and playground are on the southern side of the site.

The plans do not identify provision of suitable outside shading areas, natural and built to mitigate heat stress caused by climate change.

Response

The building has been designed with a 2.5m deep canopy outside all of the ground floor classrooms and library which will provide shading in the immediate vicinity of the building. No further external structures are proposed at this time but could be added at a later date if considered necessary by the school operator.

5. ASHP practical experience

The plans do not specify the ability of ASHP's to properly service the building in periods of extended winter conditions. This has been an issue identified in other new community buildings in the parish. There is no apparent consideration here, especially over distal parts of the building.

Response

Subject to securing Reserved Matters consent, the detailed specification of the ASHPs will be confirmed and finalised during the pre-construction phase of development. At that time the Council will need to ensure that the installations are fit for purpose and meet the building's requirements.

6. The Energy Strategy Report

The Energy Strategy Report indicates that there will be solar panels on the roof for sustainability (quotes 49% carbon reduction) but does not contain the following:

- i. No mention is made of batteries to store any excess generation for utilisation when conditions require it.
- ii. It also appears to ignore variations in solar conditions (overcast, snow etc.) which should influence peak power demand of the site. Consider dark winter days and peak heating demand.
- iii. It is confusing that the solar panels are SE facing when all recently published information states that south facing is optimal.

iv. It is not clear whether the solar panels be supplying excess generated electricity to the National Grid when not required by the school e.g. weekends and school holidays.

Response

- i. Batteries are not proposed at this time, but could be added later if needed;
- ii. The project compliance simulations (i.e., SBEM) have been calculated using Government approved software IES-VE and according to the National Calculation Methodology (NCM). The calculations have therefore been completed using an industry standard methodology;
- iii. The arrangement is stated on the drawings as 'indicative'. The orientation, panel spacing and detailed specification will be determined by a specialist installer at a later date. They will be installed to optimise performance.
- iv. These operational issues will be considered at a later date and are not a relevant planning consideration to the Reserved Matters application.

7. Satellite provision

There is a specific statement in the Design documents that the school will be a satellite to a nearby primary school (presumably Alder Grove) and will therefore share some facilities in this respect. These facilities are undefined and the consequences on catchment unclarified. [Note: Oliver Gill (Head of Education Access & Sufficiency for WBC) has responded in writing to SPC that no decision has been made on satellite/self-contained status which conflicts with the Development Brief within the applications].

Response

The school has been designed so that it could operate as either a free standing 1 FE school or a satellite to an existing school. Final decisions regarding such have yet to be taken.

8. SEN provision

The plans show two SEN classrooms, clarified as 14 ambulant SEND children (ASD/SEMH). Clarity is required on whether these spaces will be for local children or for a wider catchment involving traffic from outside of the South of M4 SDL. The plans do not include any explanation of the separation of SEN classrooms and the two SEN resource rooms and the two SEN Therapy/MI rooms on the first floor, requiring their access using stairs/lift and corridors past classrooms.

Response

Catchment for the SEND provision will be subject to parental preference and the determination of suitability made within the Education, Health & Care Plan process

for individual perspective pupils, and therefore cannot be confirmed at this time. It is the Council's medium-term ambition to expand its mainstream SEND Unit / Resource Base offer, such that all localities within Wokingham should have access to provision and that intakes become more locally focussed. That said, such considerations are not relevant to the assessment of the Reserved Matters planning application.

The building has been designed to optimise external access to the play areas direct from the classrooms and to integrate the SEND provision into the school as much as possible. This has meant that the SEN Therapy/MI rooms are located at first floor level, but there is no reason to suggest that this arrangement cannot be appropriately managed. It should be noted that pupils attending the SEND Unit / Resource Base would spend a significant amount of their time in mainstream classes and would therefore be expected to move around the school to access their full curriculum, in any case. The physical separation of the Therapy Spaces is not therefore considered to be a substantive issue.

9. Dining facilities

The plans do not explain how preparation, service and dining will be facilitated to cover 30 nursery, 210 pupils, 14 SEN pupils, and 29 staff. The space provided does not appear adequate for a one form entry and certainly not for any potential future expansion of the school.

Response

The facility has been designed to DfE standards for a 1FE primary school. Final arrangements will be dependent upon the operator, once identified.

10. EV charging

The plans do not include any detail of EV charging points.

Response

Whilst not a requirement under the outline planning permission, the development will include EV charging in accordance with WBC standards. This was an oversight in the original submissions. This commitment is confirmed within the new Transport Technical Note. The final details of such can be provided / confirmed / approved by way of a planning condition.

11. Security by Design

The plans state that external lighting will be time controlled (and include the assurance that it will meet legal and safety requirements), however it will not operate

when the building is not in use with no mention of site security and ASB considerations.

Response

An Access and Security Strategy will be prepared and submitted in due course once detailed design has been completed. This will include details of lighting, CCTV and how it is proposed to manage security and ASB problems if/as they arise.

12. DEPZ sheltering

The plans do not identify if the school construction will be suitable for DEPZ sheltering under the Emergency Response protocols.

Response

The Council has a duty of care to the future users of the site and the Project Team will engage with the Council's Emergency Planning Team during the detailed design stage of the development to ensure that appropriate emergency planning measures are in place.

13. Education Nature Park project

There is a 'forest school' shown but no school garden for planting etc – a serious omission given the NHM supported Education Nature Park project - involving schools & nurseries (nearly 3000 at last count) – this is a huge missed opportunity given the NHM establishment on the Thames Valley Science Park and its commitment to Community Engagement.

Response

A garden for planting is not a mandatory requirement for the primary school.

Opportunity does exist to provide space for planting. However, the future operator of the school has yet to be identified and therefore at this time the Council do not know if (and exactly how) the school would like to engage with the Education Nature Park project. Once identified, discussions with the future operator can be had and potential amendments to the landscaping scheme could be sought as appropriate.