



**DEPARTMENT FOR INFRASTRUCTURE | JERSEY PROPERTY
HOLDINGS**

Public Inquiry into P/2016/0870 (January 2017)

Proposed School, Les Quennevais

Construct secondary school with associated external facilities, parking, landscaping and sports field. 3D Model Available. AMENDED ADDRESS. ADDITIONAL PLANS energy centre drawings AMENDED PLANS revised vehicular exit, widening of La Rue Carree.

Field No. 80, 84, 85, 86, 86A, 87, 87A, 88 & 88A
La Rue Carree, St. Brelade,

Proof of Evidence

Consideration of Alternative Sites

Richard Glover BA DipTP Dip UD MRTPI

Need for a new school

1. The current Les Quennevais School opened 50 years ago to accommodate 550 pupils. In September 2015 there were 688 pupils on the school roll and the roll is forecast to rise to over 720 by 2024 (Environmental Impact Statement (EIS) Chapter 7 Table 7.2).
2. The rise in school rolls reflects a wider increase in pupil numbers across Jersey as opposed to the falling trend that informed the Island Plan 2011 (Island Plan 2011 para 7.18) This has meant that the opportunity to manage the number of pupils through amending catchment areas is not available as all the other secondary schools in Jersey are also required to accommodate a rising school roll (EIS Chapter 7 Table 7.1)
3. Spatial requirements of schools and colleges in Jersey are assessed against the UK Department for Education (DfE) standards (Revised Island plan 2011 para 7.7) - "Guidelines for Secondary Schools (Building Bulletin 98)" (Department for Education and Skills) These guidelines indicate that a school and grounds for up to a maximum of 850 pupils with an ideal operating level of 750 pupils would require a building of around 11,500m² on a site of around 60,000m² to provide playground / playing field, parking and servicing areas. The current school comprises 7,057m² on a 14,000m² site.
4. The school is significantly disadvantaged, compared to all other Jersey secondary schools, by its poorly designed and inadequate accommodation. (Serco Value for Money Review March 2010 attached at Appendix RG1). The cramped classrooms, outdated facilities and poor circulation routes along with physical deterioration of the fabric of the building and ever increasing maintenance costs associated with older buildings is further indication that alternative accommodation is required
5. The restricted size of the existing school site and the need to continue with business as usual for the school led to the conclusion that alternative accommodation – either based around the existing site or elsewhere – should be sought.

Where could a school be located - the Planning context

6. As indicated above on adoption in June 2011 the Island Plan 2011 stated that there was no need for a new secondary school in Jersey due at the time to falling school rolls. Policy SC01 allowed for the development of additional educational facilities or for the extension and/or alteration of existing educational premises within the grounds of existing education facilities, on a safeguarded site or within the Built-up Area.

7. In July 2013 the Minister for Planning and Environment (P&E) looked to revise parts of the Island Plan 2011. At the same time the Minister for Education Sport and Culture (ESC) had realised that because of rising school rolls and the physical condition of the existing school, as indicated above, a new secondary school was required for the west of the island. At the suggestion of the then Minister for P&E, through the revision process ESC sought some flexibility within the Island Plan to erect a new school so that if the current site could not accommodate extension / expansion or an alternative site within the Built Up Area could not be achieved then a site in the Green Zone could be brought forward.
8. The result was an amendment to the Island Plan that allowed for the provision of elements of significant public infrastructure, such as a new secondary school, within the Green Zone where it is demonstrated to satisfy a proven Island need, relative to the proper assessment of alternative options along with the need to ensure that the environmental implication of any such development is properly identified, avoided and/or mitigated as far as possible.
9. This chain of events set out in paras 6.9 to 6.22 of Chapter 6 of the EIS.

Considering sites

The sequential test

10. The 2011 Revised Island Plan's indicates that a sequential approach should be adopted in assessing development proposals (Strategic Policies Policy SP3). The sequential approach – so far as it is described in the Plan - entails seeking to locate most new residential, retail and office development in the Town of St Helier
11. Policy SP3 does not refer to the provision of schools but paragraph 7.7 of the Revised Island Plan 2011 states
 - a. *7.7Accordingly, educational facilities need to be close to the communities they serve and the Island Plan needs to ensure that land is available to meet the spatial requirements of both new and existing educational facilities, in relation to both buildings and open spaces.*
12. This means that the principles of a sequential approach can be readily adopted for the Les Quennevais School project with the existing school site as the starting point for a search for a site so as to reflect the established catchment area and community it serves.

13. Other than Policy SP3 there is no guidance in the Revised Island Plan as to what constitutes a sequential approach. Guidance from the UK ¹ has been used to inform a sequential approach which requires a suitable site to

- be proportionate and appropriate for the given proposal
- demonstrate flexibility in the format and/or scale of the proposal
- consider the site's availability, suitability and viability

14. Demonstrating a sequential approach alone does not guarantee that planning permission will be granted as all material considerations should be taken into account in reaching a decision.

- Expanding on the specific tests which should apply the following criteria were adopted
- Availability – that the site is readily available, not necessarily within the States ownership, but within a number and form of ownership or interest that it can be readily acquired or assembled
- Suitability – that the site has the capacity – either in terms of size or supporting infrastructure – to accommodate the development and that the development of the site would not cause harm to other matters of recognised importance.
- Viability – that development of the site would not be too expensive relative to other options available. The issue of viability with this project is not so much the incentive for the land to come forward for development but that the cost of the development is not made disproportionate by virtue of the characteristics, including existing land use, of the site

15. A total of 14 options were considered against these criteria.

Refurbish and extend

- 1 - Existing site
- 2 - Existing site & Les Quennevais Sports fields
- 3 - Existing site & Les Blanches Banques

New build

- 4 - Existing school site
- 5 - Airport Playing Fields
- 6 - South west of Les Quennevais Sports fields
- 7 - South east of Les Quennevais Sports fields

¹ <http://planningguidance.communities.gov.uk/blog/guidance/ensuring-the-vitality-of-town-centres/ensuring-the-vitality-of-town-centres-guidance/>

- 8 - Les Quennevais Precinct
- 9 - Mont Nicolle Primary school site
- 10 - La Moye Prison Fields
- 11 - Les Creux
- 12 - St Peter's West Show site

16. At the time of finalising the long list in discussions with the Department of the Environment a further site was suggested, comprising St Brelade Fields 77, 80, 84 – 88A & 90. A further alternative based on this suggestion a site including the fields along with the adjoining St Brelade's Sports Club, to establish whether any new build project could lessen its potential impact by utilising the existing sports pitch to accommodate some of the development was also included.

- 13 - St Brelade Fields 77, 80, 84 – 88A & 90
- 14- St Brelade's Sports Club & St Brelade Fields 77, 80, 84 – 88A & 90

17. The sites along with a location plan are attached at Appendix RG 2

18. That consideration is set out in Chapter 6 of the EIS (paras 6.32 to 6.55) and is summarised in Appendix RG 3 of this of this document

19. That exercise established 3 sites that could be considered available, suitable and viable which were

- Option 1 - South-east of Les Quennevais sports fields
- Option 2 - St Brelade Fields 77, 80, 84 – 88A & 90
- Option 3 - St Brelade's Sports Club & Fields 77, 80, 84 – 88A & 90

20. With a floor area of 11,000m² in accordance with the Planning and Building (Environmental Impact) (Jersey) Order 2006 the Les Quennevais School project required an Environmental Impact Assessment (EIA) in order to fully assess the potential impacts of the project and to identify any appropriate and proportionate mitigation measures in regard to those impacts. As well as assisting in a systematic and transparent way of assessing environmental impacts the EIA process can also be used to identify a preferred site where there are a number of potential options. For this project the EIA process was instigated to assess each of the 3 Options identified as being suitable for development through a sequential approach.

21. The following exercises, which are brought together in an EIA were undertaken for each Option

Consideration of existing uses and alternative provision

Impact on transport and traffic

Landscape and visual impact

Potential impact on biodiversity

Potential impact on archaeology

Public Consultation

22. Chapter 6 paras. 6.60 to 6.115 of the EIS set out the considerations.

23. Having gathered much more information on each Option, particularly in terms of the environmental impact of pursuing each particular Option, provided cogent and relevant information to be able to make a judgement as to which site should be the preferred Option.

Public Consultation

24. In parallel with the EIA process between September and November 2015 the Minister for Education ran a public consultation period asking for views and comments on the 3 Option sites.

25. As well as publishing information there were also a series of public meetings along with formal and informal engagement sessions to encourage as many stakeholders as possible to contribute to the debate.

26. Although not determinative in considering any potential site for the new school the input of the many stakeholders who use the school or would be impacted upon by the location of the school helps understand and assess the relative potential impact of each of the Options.

27. A summary of the 1,353 responses to the consultation is indicated in Chapter 6 Table 6.1 of the EIS

Conclusions

28. Option 1 - South-east of Les Quennevais sports fields

There would be a significant impact on the whole of the island through the loss of the playing fields and associated facilities if Option 1 were to be pursued. If an alternative site could be located to compensate for the facilities which would be lost, the cost of those compensatory facilities is likely to mean the proposal would not be viable.

Whilst the highway network would be likely to have the capacity to cope with additional traffic, even if this required some improvements, the likely impact on amenity from the traffic and the impact on car parking provision at the sports centre raises further concerns. There would be limited visual and landscape impact and ecological and archaeological impact could be mitigated against, the loss of the playing fields would mean this site would not be suitable for the new school.

17.5% of respondents to the consultation supported this site

29. Option 2 - St Brelade Fields 77, 80, 84 – 88A & 90

As there has been a thorough and comprehensive process of identifying sites for the school within the Built Up Area Island Plan Policy NE7 allows for consideration of sites within the Green Zone. The Landscape and Visual Impact Assessment concluded that the project located at this site would have a localised landscape and visual impact. Whilst the loss of agricultural land is regrettable that loss would not result in serious harm to the landscape character.

There are no issues of transport / traffic, ecology or archaeology that might significantly prejudice pursuit of Option 2.

67% of respondents to the consultation supported this site

30. Option 3 - St Brelade's Sports Club & Fields 77, 80, 84 – 88A & 90

As there has been a thorough and comprehensive process of identifying sites for the school within the Built Up Area Island Plan Policy NE7 allows for consideration of sites within the Green Zone. The Landscape and Visual Impact Assessment concluded that the project located at this site would have a localised landscape and visual impact. Whilst the loss of agricultural land is regrettable that loss would not result in serious harm to the landscape character. There are no issues of transport / traffic, ecology or archaeology that might significantly prejudice pursuit of this site.

Pursuing this option would also involve the loss of a sports pitch that provides a valued local social hub. Whilst there might be opportunity to replicate the facilities at the new school, the use of the sports pitch as part of the development makes no discernible difference between the impact of the project on the landscape and visual character compared to Option 2. As such in comparison to Option 2, Option 3 is not suitable.

15.5% of respondents to the consultation supported this site

31. Applying the sequential approach and properly assessing the alternative options, - including identifying their environmental implications - identified Option 2 of the short listed sites – St Brelade Fields 77, 80, 84 – 88A & 90 - as the most appropriate to accommodate the new Les Quennevais School.

