

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004**

**OUTLINE APPLICATION FOR RESIDENTIAL DEVELOPMENT OF  
43 DWELLINGS AND ASSOCIATED WORKS  
ON LAND ADJACENT TO  
OAKHURST RISE, CHELTENHAM, GLOUCESTERSHIRE, GL52 6JU**

**EDUCATION AND LIBRARY PROVISION**

**APPENDICES TO PROOF OF EVIDENCE**

**JAN KINSMAN CENG, MICE, BSC(ENG), ACGI  
ON BEHALF OF  
WILLIAM MORRISON (CHELTENHAM) LTD AND  
THE TRUSTEES OF THE CARMELITE CHARITABLE TRUST**

**FEBRUARY 2021**

**INSPECTORATE REFERENCE: APP/B1605/W/20/3261154  
LPA REFERENCE: 20/00683/OUT**

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**Subject:** RE: Proposed Development on Land adjacent Oakhurst Rise, Cheltenham - Appln Ref. 20/00683/OUT

**From:** "THOMAS, Sophie" <Sophie.Thomas@gloucestershire.gov.uk>

**Date:** 22/01/2021, 16:51

**To:** "'jan@efm-ltd.co.uk'" <jan@efm-ltd.co.uk>

**CC:** "BOUCHER, Bridgette" <Bridgette.BOUCHER@gloucestershire.gov.uk>, "Emma.Pickernell@cheltenham.gov.uk" <Emma.Pickernell@cheltenham.gov.uk>, 'Jeremy Patterson' <Jeremy.Patterson@tewkesbury.gov.uk>, "helen.thomas@cheltenham.gov.uk" <helen.thomas@cheltenham.gov.uk>

Hi Jan,

Thank you for your email. As you know I met with Education and Library colleagues on Tuesday 19/01/2021 to discuss the points in your email of 12/01/2021.

With regards to responses relating to Education, you have had comprehensive responses to all emails prior to December 2020, please find a summary of this correspondence attached, which was originally sent to you on 1 December 2020. Stephen Chandler (Education Place Planning Manager) then responded on 10 December to your email of 7 December, saying that he has no further comment, please also find that email attached.

GCC Education have fully assessed the impact of the proposal, the subject of the forthcoming Appeal, in terms of its impact on education infrastructure using up to date evidence and forecasts ; this information has been provided through GCC's consultation responses/written representations and supporting data to the LPA. The considerable number of additional questions and queries from you have been fully addressed by GCC Education directly by email and I, therefore, believe that GCC's position in relation to the proposed Education provisions must now be clear to you.

With regard to GCC Libraries, please find the notes previously sent which have been updated with paragraph references to assist with addressing the questions ( in italics) as below:

QUESTIONS POSED	RESPONSES PROVIDED
<i>The further information does not provide any information about the MLA Standard Charge document being adopted for use by GCC. I therefore assume that the document has not been adopted by GCC - other than for its use in calculating contributions, and as such its 'adoption' is simply through the reference made in the adopted Local Developer Guide. (Points 1 and 3)</i>	The MLA Standard Charge document includes the 30sqm per 1,000 population benchmark library floorspace standard. The way in which this floorspace standard has been used by GCC in the assessment of this development is set out clearly at paragraph 10(i) of the note. The 30 sqm per 1,000 population standard is used by GCC as it remains the <b>recognised national benchmark</b> for assessing library floorspace requirements. Accordingly, it is also the floorspace standard that continues to be used by many other County Councils across England (as statutory Library Authorities) when assessing development impacts and mitigation options.
<i>It is useful to know that a new Library Strategy was in the early stages prior to the pandemic. Is there any documentation at all about this which can be provided, please? (Point 2)</i>	No. An internal consultation was held with a public consultation planned in March 2020, however this was put on hold whilst GCC Libraries officers focus on operational and registration matters arising from the ongoing pandemic and associated lockdown restrictions. It is therefore unlikely that progress on the preparation of the Strategy, including consultation with library users, will take place until much later in the year.
<i>Please can you provide me with the assessment GCC undertook for this particular development. (Points 4 and 5)</i>	The methodology used and the assessment undertaken by GCC in respect of the proposed development and potential mitigation options is set out at paragraphs 7 - 12 of the note (as part of the commentary on CIL 122 test compliance).

<p><i>Regarding the project at Charlton Kings Library, is any information available about the proposed project and what it will achieve, please? (Point 6)</i></p>	<p>The extent of the information available at this time and what the mitigation would achieve has been provided at paragraphs 10(iii) and 11 of the note. No detailed project has been drawn up at this early stage, in acknowledgment that the proposed development does not have planning permission, and the likely timescales for implementation and completion of the development are unknown. Confirmation of the financial contribution payable (£8,428), the name of the library that it is to be directed to (Charlton Kings) and the scope of works (i.e. types of internal works to increase capacity listed at paragraph 10(iii) and 11 of the note) would be set out in the proposed section 106 agreement.</p>
<p><i>I also note reference to a recent appeal case, and have looked at the appeal decision and other appeal documents online. It does not appear that the library contribution was contested in the appeal case, but please let me know if I am wrong about that.</i></p>	<p>The library contribution was not contested by the Appellant, however, the Planning Inspector nevertheless confirmed in his decision that the planning obligation towards library provision complied with the CIL 122(2) tests. To be best of my knowledge, a library provision sought by GCC has never failed a compliance test.</p>
<p><i>You have not provided any information about the receipt and expenditure of contributions secured from other developments, and I assume I am obliged to seek such information via an Fol request.</i></p>	<p>Your original request asked for a link to a source of information in respect of contributions secured, received and expenditure of contributions. I attach a link to the County's infrastructure funding statement which outlines this information:  <a href="https://www.gloucestershire.gov.uk/media/2103790/gcc-draft-infrastructure-funding-statement-2019_20-final.pdf">https://www.gloucestershire.gov.uk/media/2103790/gcc-draft-infrastructure-funding-statement-2019_20-final.pdf</a></p>

The above information along with the representations and supporting data provide all the information we have relevant to the education and library contributions requested in respect of proposed development and will be referred to in evidence at the Inquiry as required by the LPA should the proposed provisions remain contested.

Best wishes,  
 Sophie

Sophie Thomas  
 Developer Contributions Investment Officer  
 Strategic Infrastructure

Phone: 01452 426199  
 Email: [sophie.thomas@gloucestershire.gov.uk](mailto:sophie.thomas@gloucestershire.gov.uk)

[www.gloucestershire.gov.uk](http://www.gloucestershire.gov.uk)

---

**From:** jan@efm-ltd.co.uk [mailto:jan@efm-ltd.co.uk]  
**Sent:** 12 January 2021 17:01  
**To:** THOMAS, Sophie  
**Cc:** Ian Kirby; KENT, Alastair; EVERISS, Jane; BOUCHER, Bridgette  
**Subject:** Re: Proposed Development on Land adjacent Oakhurst Rise, Cheltenham - Appln Ref. 20/00683/OUT

Dear Sophie

Thank you for your email.

I now have a copy of the further information that you provided to Emma. The further information is helpful to a point, but I am disappointed it does not address all the matters that I raised in sufficient detail.

The further information does not provide any information about the MLA Standard Charge document being adopted for use by GCC. I therefore assume that the document has not been adopted by GCC - other than for its use in calculating contributions, and as such its 'adoption' is simply through the reference made in the adopted Local Developer Guide. (Points 1 and 3)

It is useful to know that a new Library Strategy was in the early stages prior to the pandemic. Is there any documentation at all about this which can be provided, please? (Point 2)

Please can you provide me with the assessment GCC undertook for this particular development. (Points 4 and 5)

Regarding the project at Charlton Kings Library, is any information available about the proposed project and what it will achieve, please? (Point 6)

I also note reference to a recent appeal case, and have looked at the appeal decision and other appeal documents online. It does not appear that the library contribution was contested in the appeal case, but please let me know if I am wrong about that.

You have not provided any information about the receipt and expenditure of contributions secured from other developments, and I assume I am obliged to seek such information via an FoI request.

You have also asked me whether there are any outstanding queries relating to Education matters. Yes, there are outstanding matters. You will have seen my email to Stephen Chandler dated 7 December, which I think makes it clear that I am not convinced about the need for education contributions, and am seeking further information. You will also have seen Stephen's response of 10 December, which makes clear that he is unwilling to provide a formal response to my email of 30 June or engage further.

I am now preparing evidence and draft Statements of Common Ground to assist the Inspector. Am I correct in thinking that I should liaise with you regarding the latter, for both education and libraries?

By all means, please give me a call if you have any queries about the above.

--

Best wishes,

Jan Kinsman

EFM (Educational Facilities Management Partnership Limited) Mobile: 07841 583256 Landline: 01920 877188

email: [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk)

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On 04/01/2021 17:50, THOMAS, Sophie wrote:

Hi Jan,

Thank you for your email and a happy new year to you.

I sent a further response to Emma Pickernell the case officer on 21/12/2020 relating to Libraries. Emma is returning to work tomorrow I believe.

I hope this answers your queries regarding libraries and can you confirm if there are any outstanding queries relating to Education matters?

Best wishes,  
Sophie

Sophie Thomas  
Developer Contributions Investment Officer  
Strategic Infrastructure

Phone: 01452 426199  
Email: [sophie.thomas@gloucestershire.gov.uk](mailto:sophie.thomas@gloucestershire.gov.uk)

[www.gloucestershire.gov.uk](http://www.gloucestershire.gov.uk)

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**From:** [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk) [<mailto:jan@efm-ltd.co.uk>]  
**Sent:** 04 January 2021 16:05  
**To:** THOMAS, Sophie  
**Cc:** Ian Kirby; KENT, Alastair; EVERISS, Jane  
**Subject:** Re: Proposed Development on Land adjacent Oakhurst Rise, Cheltenham - Appln Ref. 20/00683/OUT

Dear Sophie

I trust you are well, and have had a good break over Christmas and the New Year - in whatever way you were able to celebrate/relax in these difficult times.

I was just wondering whether you have any information back from Libraries colleagues yet, or have any idea when information might be available?

You are welcome to give me a call. Many thanks.

--

Best wishes,  
Jan  
Mobile: 07841 583256 Landline: 01920 877188  
On 30/11/2020 13:07, THOMAS, Sophie wrote:

Hi Jan,

Thank you for your email.

I have passed your enquiry to my colleagues in Libraries and have asked if they can address the points you have made. I will respond to you as soon as I have more information.

Best wishes,  
Sophie

Sophie Thomas  
Developer Contributions Investment Officer  
Strategic Infrastructure  
Gloucestershire County Council  
Shire Hall, Westgate Street, Gloucester  
GL1 2TG

Phone: 01452 426199

Email: [sophie.thomas@gloucestershire.gov.uk](mailto:sophie.thomas@gloucestershire.gov.uk)

[www.gloucestershire.gov.uk](http://www.gloucestershire.gov.uk)

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**From:** [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk) [<mailto:jan@efm-ltd.co.uk>]

**Sent:** 27 November 2020 17:02

**To:** THOMAS, Sophie

**Cc:** Ian Kirby

**Subject:** Fwd: Proposed Development on Land adjacent Oakhurst Rise, Cheltenham - Appln Ref. 20/00683/OUT

Dear Sophie

Firstly please see the email below for your information, with my apologies as I thought I had copied you into it at the time. If you are not already aware, the proposed development on Land adjacent to Oakhurst Rise was refused consent, and the refusal has been appealed.

I am now preparing for the forthcoming appeal, and you will have seen a number of emails about education matters today. Alongside the justification for education contributions, I am also reviewing the library contribution requirements and would be grateful for some further information please.

1. Thank you for including the policy references in GCC's response of 4 June 2020. I am conscious that things have moved on, even since the MLA Standard Charge document was published in May 2010. Indeed, the abolition of the MLA itself was announced in July 2010, and I am wondering to what extent the advice in that document has subsequently been adopted and for what purpose, other than in the calculation of s106 contributions. Can you comment on this, please? (Please see point 3 below.)

2. It also seems to me that GCC's own policy document, even although only produced a couple of years later, demonstrates a more forward thinking approach, with less reliance on traditional building space which underpins the the MLA's standard charge calculation (and has its roots in much older thinking about libraries). Has there been any further work on developing future policy, updating the 2012 policy document or opening/closing/changing the nature of any libraries since 2012?

3. It is notable that there is no reference in GCC's own policy document to the MLA Standard Charge document, or to any detailed calculations about levels of provision that underpin GCC's policy, and I would be grateful if you would provide me with the references to such materials in GCC's policy work - as I appreciate that these may be available in background papers that are harder to find, and I have not succeeded in finding any such details.

4. The response to the application states that, *"New development will be assessed by the County Council to determine whether it will adversely impact on the existing provision of local library services. In doing so careful consideration will be given to current levels of provision compared against the nationally recommended benchmark of the Arts Council - formerly put together by Museums, Libraries and Archives Council (MLA)."*

Please could you:

a) explain the rationale and justification<sup>5</sup> for this approach, if it does not

underpin current levels of service provision; and  
b) provide GCC's assessment of each library in the county, showing the population served and floorspace available.

5. The response to the application also states that, *"In this case the proposed development and increase in population will have an impact on resources at the local library and a contribution is required."* Please provide a copy of the GCC's assessment of this particular application. I am particularly interested to understand the evidence of additional demand, the details of the existing provision and the extent to which the library will not be able to meet the additional demand arising from the proposed development.

6. I note the contribution is required towards Charlton Kings Library. Please can you provide details of the proposed project, how it will mitigate the impact of the development, and its status.

Finally, I am aware that contributions towards library provision have been sought by GCC for many years. Is there a ready source of information about the various developments from which such contributions have been secured, contributions received and expenditure of contributions, such as regular monitoring reports to members, that you could provide me with a link to please?

Please do not hesitate to contact me if any of the above is unclear, or if it might be useful to discuss any particular points. Many thanks.

--

Regards,

Jan Kinsman

EFM (Educational Facilities Management Partnership Limited) Mobile:

07841 583256 Landline: 01920 877188

email: [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk)

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----- Forwarded Message -----

**Subject:**Re: Proposed Development on Land adjacent Oakhurst Rise,  
Cheltenham - Appln Ref. 20/00683/OUT

**Date:**Thu, 29 Oct 2020 10:26:13 +0000

**From:**[jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk) <[jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk)>

**To:**CHANDLER, Stephen

<[Stephen.Chandler2@gloucestershire.gov.uk](mailto:Stephen.Chandler2@gloucestershire.gov.uk)>

**CC:**VINE, Gareth <[Gareth.VINE@gloucestershire.gov.uk](mailto:Gareth.VINE@gloucestershire.gov.uk)>,

MEDLAND, Clare <[Clare.Medland@gloucestershire.gov.uk](mailto:Clare.Medland@gloucestershire.gov.uk)>, Ian

Kirby <[ian@hdevans.co.uk](mailto:ian@hdevans.co.uk)>

Dear Stephen and Sophie

I refer to Stephen's email of 17 September, below, advising me of his intention to reduce the pupil product ratio (PPR) for Post-16 pupils, and also to Sophie's email of 21 October to Emma Pickernell - which I have now received via Davies and Partners (my client's solicitors).

As you may be aware, my client's application was refused consent on 17 September. My client has now appealed against that refusal. I am therefore seeking to progress discussions on planning obligation matters in preparation



for a s106 agreement or unilateral undertaking being submitted as part of the appeal.

About the post 16 calculation, Stephen's email to me states his proposal to apply a Post-16 PPR of 8 per 100 dwellings - representing a rounding up of 7.81% of 11 children observed in three year groups (actual figure = 7.81). Sophie's email does not specify the PPR used but identifies a requirement for 2.73 pupils from 39 qualifying dwellings, which equates to a PPR of 7 per 100 dwellings. I would be grateful if you could confirm the detail of the calculation now proposed for use, and the rationale for it.

I have to say that I am not convinced that the revised PPR has been appropriately calculated - it still looks too high, and would appreciate your further consideration of this matter. You may recall that I previously suggested a figure of 2.4 per 100 dwellings in my email of 30 June at 1259 hrs.

So far as other education matters are concerned, I raised a number of points in my email of 30 June at 1033 hrs, and we subsequently had a conference call on 15 July in which some of these points were discussed. However, I have not received a formal response. For the purposes of the appeal, and clarity regarding your responses to the points that I made in my emails of 30 June, I would be grateful if you would respond in writing. I think it would be most useful if you could respond paragraph by paragraph, using a different font/colour within the text of my emails. I can then consider what can be agreed and whether any further information is required, with a view to preparing a Statement of Common Ground on education matters for your consideration. If you could indicate a timescale for your response, it would be helpful.

I will write separately to you, Sophie, about the justification for the library contributions.

--

Regards,

Jan

On 17/09/2020 16:42, CHANDLER, Stephen wrote:

Dear Jan

I am using "Reply All" to your email below, so hopefully this will get through. Please would you confirm that it arrives safely?

I have received a response from the survey company about Post-16 aged children recorded in the pupil product ratio (PPR) report. They have confirmed that the PPR recorded of 11 children per 100 dwellings for Post-16 was based upon three year groups rather than two. The breakdown of these children is that 71% were still at school, 11% were attending university and 18% were no longer in education.

On the basis of this new information I would propose applying a PPR of 8 Post-16 children per 100 dwellings requiring a school place (calculated as 71% of 11).

Kind regards

Stephen

**Stephen Chandler**  
**Place Planning Manager**

**Commissioning for Learning**  
Gloucestershire County Council  
Shire Hall, Westgate Street, Gloucester GL1 2TP

Tel: 01452 328674  
Email: [stephen.chandler2@gloucestershire.gov.uk](mailto:stephen.chandler2@gloucestershire.gov.uk)

[earlier emails and disclaimers deleted for brevity - JK]

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Attachments:-----

ForwardedMessage.eml	642 kB
ForwardedMessage.eml	36.0 kB
2000683OUT Land at Oakhurst Rise Note 2212 with para numbering.pdf	195 kB

**Subject:** RE: Proposed Development on Land adjacent Oakhurst Rise, Cheltenham - Appln Ref. 20/00683/OUT  
**From:** "CHANDLER, Stephen" <Stephen.Chandler2@gloucestershire.gov.uk>  
**Date:** 01/12/2020, 16:46  
**To:** "jan@efm-ltd.co.uk" <jan@efm-ltd.co.uk>  
**CC:** "VINE, Gareth" <Gareth.VINE@gloucestershire.gov.uk>, Ian Kirby <ian@hdevans.co.uk>, "THOMAS, Sophie" <Sophie.Thomas@gloucestershire.gov.uk>, "MEDLAND, Clare" <Clare.Medland@gloucestershire.gov.uk>

Dear Jan

Thank you for your email below dated 27/11/2020 in which you asked for a reply to your email of 29/10/2020, also below. I believe that all of the points in the latter email have already been answered in subsequent correspondence, but I will collate our responses again in this email for convenience.

On 29/10/2020 you wrote:

*I refer to Stephen's email of 17 September, below, advising me of his intention to reduce the pupil product ratio (PPR) for Post-16 pupils, and also to Sophie's email of 21 October to Emma Pickernell - which I have now received via Davies and Partners (my client's solicitors).*

Please see my email below dated 17/09/2020.

*As you may be aware, my client's application was refused consent on 17 September. My client has now appealed against that refusal. I am therefore seeking to progress discussions on planning obligation matters in preparation for a s106 agreement or unilateral undertaking being submitted as part of the appeal.*

Noted.

*About the post 16 calculation, Stephen's email to me states his proposal to apply a Post-16 PPR of 8 per 100 dwellings - representing a rounding up of 7.81% of 11 children observed in three year groups (actual figure = 7.81).*

Please see my email below dated 17/09/2020.

*Sophie's email does not specify the PPR used but identifies a requirement for 2.73 pupils from 39 qualifying dwellings, which equates to a PPR of 7 per 100 dwellings. I would be grateful if you could confirm the detail of the calculation now proposed for use, and the rationale for it.*

I confirm that the revised education request for Post-16 places uses a calculation of 7 places per 100 dwellings. As you note above I originally proposed a figure of 8 places per 100 dwellings, but you pointed out that this represented a rounding up of 7.81. We have instead rounded down in the developer's favour to 7 places per 100 dwellings.

The rationale for this calculation, as described in my email below dated 17/09/2020, is that whilst the Population Forecasting Study found 11 Post-16 children generated per 100 dwellings, the breakdown of these children was that 71% were still at school, 11% were attending university and 18% were no longer in education. As you note above 71% of 11 is 7.81, which we have rounded down to 7.

Please see Table 11 on page 13 of the report, published at <https://www.gloucestershire.gov.uk/media/2100485/gloucestershire-new-build-ppr-report-final.pdf>

*I have to say that I am not convinced that the revised PPR has been appropriately calculated - it still looks too high, and would appreciate your further consideration of this matter. You may recall that I previously suggested a figure of 2.4 per 100 dwellings in my email of 30 June at 1259 hrs.*

Your suggestion is not acceptable, please see the email below from Clare Medland dated 27/11/2020.

*So far as other education matters are concerned, I raised a number of points in my email of 30 June at 1033 hrs, and we subsequently had a conference call on 15 July in which some of these points were discussed. However, I have not received a formal response. For the purposes of the appeal, and clarity regarding your responses to the points that I made in my emails of 30 June, I would be grateful if you would respond in writing. I think it would be most useful if you could respond paragraph by paragraph, using a different font/colour within the text of my emails. I can then consider what can be agreed and whether any further information is required, with a view to preparing a Statement of Common Ground on education matters for your consideration. If you could indicate a timescale for*

*your response, it would be helpful.*

Please find attached a copy of our formal response to this planning application. I will leave it to you to rearrange the order of the paragraphs and to change to different fonts/colours if you so wish.

Kind regards

Stephen

**Stephen Chandler**

**Place Planning Manager**

**Commissioning for Learning**

Gloucestershire County Council

Shire Hall, Westgate Street, Gloucester GL1 2TP

Tel: 01452 328674

Email: [stephen.chandler2@gloucestershire.gov.uk](mailto:stephen.chandler2@gloucestershire.gov.uk)

---

**From:** jan@efm-ltd.co.uk [mailto:jan@efm-ltd.co.uk]

**Sent:** 27 November 2020 13:50

**To:** CHANDLER, Stephen

**Cc:** VINE, Gareth; Ian Kirby; THOMAS, Sophie; MEDLAND, Clare

**Subject:** Re: Proposed Development on Land adjacent Oakhurst Rise, Cheltenham - Appln Ref. 20/00683/OUT

Dear Stephen

Thank you for your email. I had not seen your email to Sophie, but the contents appear to have been accurately included in Sophie's email of 21 October to the case officer.

Notwithstanding the information in that email, I am asking for a full reply to my email of 29 October, in the context of the upcoming planning appeal.

In relation to Post 16, my email of 29 October requests further detail in these terms, "I would be grateful if you could confirm the detail of the calculation now proposed for use, and the rationale for it." I believe this is a reasonable request in the circumstances. Please could you include where, in the PPR Report, I can find the figures you have used in your calculation and what discounts have then been applied to account for the fact that not every Post 16 age child stays on a school.

My email of 29 October also seeks a formal written response to the various points raised in my email of 30 June. Again, I consider this is a reasonable request in the circumstances, and I believe it will make the appeal process more efficient.

--

Regards,

Jan

On 27/11/2020 13:03, CHANDLER, Stephen wrote:

Dear Jan

Please find attached a copy of the email that I sent to Sophie for communication via the planning case officer on this matter. I trust that it provides the information you need.

Kind regards

Stephen

**Stephen Chandler**

**Place Planning Manager**

**Commissioning for Learning**

Gloucestershire County Council

Shire Hall, Westgate Street, Gloucester GL1 2TP

Tel: 01452 328674

Email: [stephen.chandler2@gloucestershire.gov.uk](mailto:stephen.chandler2@gloucestershire.gov.uk)

---

-----**From:** jan@efm-ltd.co.uk [mailto:jan@efm-ltd.co.uk]

-----**Sent:** 27 November 2020 12:43

-----**To:** MEDLAND, Clare; CHANDLER, Stephen

-----**Cc:** VINE, Gareth; Ian Kirby; THOMAS, Sophie

**Subject:** Re: Proposed Development on Land adjacent Oakhurst Rise, Cheltenham - Appln Ref. 20/00683/OUT  
**From:** "jan@efm-ltd.co.uk" <jan@efm-ltd.co.uk>  
**Date:** 27/11/2020, 12:43  
**To:** "MEDLAND, Clare" <Clare.Medland@gloucestershire.gov.uk>, "CHANDLER, Stephen" <Stephen.Chandler2@gloucestershire.gov.uk>  
**CC:** "VINE, Gareth" <Gareth.VINE@gloucestershire.gov.uk>, Ian Kirby <ian@hdevans.co.uk>, "THOMAS, Sophie" <Sophie.Thomas@gloucestershire.gov.uk>  
**BCC:** namsnik@yahoo.com

Dear Clare

Thank you for your prompt response.

I apologise if including the whole of the email chain made my request unclear. Please see my email of 29 October which sets out my current position. It is that email that I am seeking a response to, please.

For information, Stephen advised me by email on 17 September that the incorrect number of year groups had been used - his email is below. I had emailed Stephen (and you) on 16 September pointing out that I had not heard anything about the survey company's response. I do not recall any "discussion". Had Stephen called me to discuss, I would have sought to agree the calculations he was proposing. As it is, I am still unclear about how the figure of 7 per 100 dwellings has been arrived at - as I trust my email of 29 October makes clear.

--

Regards,

Jan

On 27/11/2020 12:20, MEDLAND, Clare wrote:

Hello Jan

I understand that Stephen did respond to you on this matter some time ago?

He agreed with you by telephone that we would reduce our Post-16 request from 11 per 100 dwellings to 7 per 100. I understand that he discussed with you the justification for this reduction because of the previously incorrect number of year groups included in the Cognisant survey study. Stephen then followed this up in writing and the change was notified to the Case Officer and to case officers of approx. 60 other planning applications affected during the period November 2019 to September 2020, where the error applied.

Whilst I understand that you have suggested an offer from June 2020 of 2.4 places per 100 dwellings, this is not acceptable.

The Post 16 demand arising from development has been evidenced to by 7 per 100 dwellings, and that is our position.

Kind regards

Clare

**Clare Medland**

**Head of Service - Commissioning for Learning**

Education, Children's Service

Gloucestershire County Council, Shire Hall, Westgate Street, Gloucester, GL1 2TP

[clare.medland@gloucestershire.gov.uk](mailto:clare.medland@gloucestershire.gov.uk), Tel: 01452 328686, Mobile: 07770 302439

**EBDOG Executive Committee – National Secretary**

Advance notice - please note that wef January 2021, I am reducing my hours of work and my working days will

be Monday, Tuesday, Wednesday only.

---

**From:** [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk) [<mailto:jan@efm-ltd.co.uk>]  
**Sent:** 27 November 2020 11:59  
**To:** CHANDLER, Stephen; MEDLAND, Clare  
**Cc:** VINE, Gareth; Ian Kirby  
**Subject:** Re: Proposed Development on Land adjacent Oakhurst Rise, Cheltenham - Appln Ref. 20/00683/OUT

Dear Clare

Apologies for troubling you, but I have heard nothing back from Stephen in response to my emails below.

I appreciate that Stephen may be on leave and, of course, I hope he is not unwell. Could you please let me know what the situation is? Thank you.

--

Regards,

Jan

On 12/11/2020 15:46, [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk) wrote:

Dear Stephen

I would be grateful if you would confirm when you expect to be able to respond to my email below. Many thanks.

--

Regards,

Jan Kinsman

EFM (Educational Facilities Management Partnership Limited) Mobile: 07841

583256 Landline: 01920 877188

email: [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk)

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On 29/10/2020 10:26, [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk) wrote:

Dear Stephen and Sophie

I refer to Stephen's email of 17 September, below, advising me of his intention to reduce the pupil product ratio (PPR) for Post-16 pupils, and also to Sophie's email of 21 October to Emma Pickernell - which I have now received via Davies and Partners (my client's solicitors).

As you may be aware, my client's application was refused consent on 17 September. My client has now appealed against that refusal. I am therefore seeking to progress discussions on planning obligation matters in preparation for a s106 agreement or unilateral undertaking being submitted as part of the appeal.

About the post 16 calculation, Stephen's email to me states his proposal to apply a Post-16 PPR of 8 per 100 dwellings - representing a rounding up of 71% of 11 children observed in three year groups (actual figure = 7.81). Sophie's email does not specify the PPR used but identifies a requirement for 2.73 pupils from 39 qualifying dwellings, which equates to a PPR of 7 per

100 dwellings. I would be grateful if you could confirm the detail of the calculation now proposed for use, and the rationale for it.

I have to say that I am not convinced that the revised PPR has been appropriately calculated - it still looks too high, and would appreciate your further consideration of this matter. You may recall that I previously suggested a figure of 2.4 per 100 dwellings in my email of 30 June at 1259 hrs.

So far as other education matters are concerned, I raised a number of points in my email of 30 June at 1033 hrs, and we subsequently had a conference call on 15 July in which some of these points were discussed. However, I have not received a formal response. For the purposes of the appeal, and clarity regarding your responses to the points that I made in my emails of 30 June, I would be grateful if you would respond in writing. I think it would be most useful if you could respond paragraph by paragraph, using a different font/colour within the text of my emails. I can then consider what can be agreed and whether any further information is required, with a view to preparing a Statement of Common Ground on education matters for your consideration. If you could indicate a timescale for your response, it would be helpful.

I will write separately to you, Sophie, about the justification for the library contributions.

--

Regards,

Jan

On 17/09/2020 16:42, CHANDLER, Stephen wrote:

Dear Jan

I am using "Reply All" to your email below, so hopefully this will get through. Please would you confirm that it arrives safely?

I have received a response from the survey company about Post-16 aged children recorded in the pupil product ratio (PPR) report. They have confirmed that the PPR recorded of 11 children per 100 dwellings for Post-16 was based upon three year groups rather than two. The breakdown of these children is that 71% were still at school, 11% were attending university and 18% were no longer in education.

On the basis of this new information I would propose applying a PPR of 8 Post-16 children per 100 dwellings requiring a school place (calculated as 71% of 11).

Kind regards

Stephen

**Stephen Chandler**

**Place Planning Manager**

**Commissioning for Learning**

Gloucestershire County Council

Shire Hall, Westgate Street, Gloucester GL1 2TP

Tel: 01452 328674

Email: [stephen.chandler2@gloucestershire.gov.uk](mailto:stephen.chandler2@gloucestershire.gov.uk)

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~~From: [jan@efm-ld.co.uk](mailto:jan@efm-ld.co.uk) [mailto:[jan@efm-ld.co.uk](mailto:jan@efm-ld.co.uk)]~~ -----  
~~Sent: 16 September 2020 13:03~~ -----

**Subject:** Re: Proposed Development on Land adjacent Oakhurst Rise, Cheltenham - Appln Ref. 20/00683/OUT  
**From:** "jan@efm-ltd.co.uk" <jan@efm-ltd.co.uk>  
**Date:** 16/09/2020, 13:03  
**To:** "MEDLAND, Clare" <Clare.Medland@gloucestershire.gov.uk>, "CHANDLER, Stephen" <Stephen.Chandler2@gloucestershire.gov.uk>  
**CC:** "VINE, Gareth" <Gareth.VINE@gloucestershire.gov.uk>, Ian Kirby <ian@hdevans.co.uk>  
**BCC:** namsnik@yahoo.com

Dear Stephen

It appears I have still not received any reply to my emails below. Is this correct, please, or is my email system letting me down?

If you have sent me an email, please give me a brief call so that I know and can investigate further. Many thanks.

--

Regards,  
Jan

On 01/09/2020 15:26, [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk) wrote:

Dear Stephen

I am following up my emails below, as I do not appear to have received a reply since your return to work?

--

Regards,  
Jan

On 19/08/2020 17:25, [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk) wrote:

Dear Stephen

I trust you enjoyed your leave.

Have you received anything from the survey company as yet, please?

--

Regards,  
Jan

On 14/08/2020 10:49, MEDLAND, Clare wrote:

Good morning Jan

Stephen has been on leave for 2 weeks. He has raised this with the survey company, so hopefully he should be able to provide an update on his return to work next week.

Regards  
Clare

**Clare Medland**  
**Head of Commissioning for Learning**  
Education and Disabled Children's Service  
Gloucestershire County Council  
Shire Hall, Westgate Street  
Gloucester, GL1 2TP [clare.medland@gloucestershire.gov.uk](mailto:clare.medland@gloucestershire.gov.uk)

Tel: 01452 28686 Mob: 07770 302439



If unavailable please contact Executive Support - 01452 323437

**EBD OG Executive Committee – National Secretary**

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**From:** [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk) [<mailto:jan@efm-ltd.co.uk>]  
**Sent:** 14 August 2020 10:44  
**To:** CHANDLER, Stephen  
**Cc:** VINE, Gareth; MEDLAND, Clare  
**Subject:** Re: Proposed Development on Land adjacent Oakhurst Rise, Cheltenham - Appln Ref. 20/00683/OUT

Dear Stephen

Have you received anything from the survey company as yet, please?

--

Regards,  
Jan

On 29/07/2020 12:29, CHANDLER, Stephen wrote:

Dear Jan

I apologise for the delay in responding to your query. I confirm that I have requested the information below from the survey company. I have not yet received a response from them, but I will let you know as soon as possible.

Kind regards

Stephen

**Stephen Chandler**  
**Place Planning Manager**  
**Commissioning for Learning**  
Gloucestershire County Council  
Shire Hall, Westgate Street, Gloucester GL1 2TP

Tel: 01452 328674  
Email: [stephen.chandler2@gloucestershire.gov.uk](mailto:stephen.chandler2@gloucestershire.gov.uk)

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**From:** [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk) [<mailto:jan@efm-ltd.co.uk>]  
**Sent:** 23 July 2020 11:32  
**To:** CHANDLER, Stephen  
**Subject:** Proposed Development on Land adjacent Oakhurst Rise, Cheltenham - Appln Ref. 20/00683/OUT

Dear Stephen

Are you able to give any indication of when you might receive the survey company's response to the questions about the Post-16 factors, please?

I think you were going to ask them to confirm how many year groups are included in the Post-16 figures, and what proportion of those counted in the survey were attending sixth form (to confirm whether the PPRs you are using reflect expected residents or sixth form attendance).

Many thanks.

--

Regards,

Jan Kinsman

EFM (Educational Facilities Management Partnership Limited) Mobile: 07841 583256 Landline: 01920 877188

email: [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk)

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accepts no liability in connection therewith.

**Subject:** RE: Appeal Reference APP/B1605/W/20/3261154 - Proposed Development on Land adjacent Oakhurst Rise, Cheltenham - LPA Ref. 20/00683/OUT  
**From:** "CHANDLER, Stephen" <Stephen.Chandler2@gloucestershire.gov.uk>  
**Date:** 10/12/2020, 10:55  
**To:** "'jan@efm-ltd.co.uk'" <jan@efm-ltd.co.uk>  
**CC:** Ian Kirby <ian@hdevans.co.uk>, "THOMAS, Sophie" <Sophie.Thomas@gloucestershire.gov.uk>, "VINE, Gareth" <Gareth.VINE@gloucestershire.gov.uk>, "MEDLAND, Clare" <Clare.Medland@gloucestershire.gov.uk>

Dear Jan

We have answered your questions and provided the evidence and justification for the education funding contribution relating to Oakhurst Rise on several occasions, most recently on 1 December 2020. I have no further comment to make on your email below.

Kind regards

Stephen

**Stephen Chandler**

**Place Planning Manager**

**Commissioning for Learning**

Gloucestershire County Council

Shire Hall, Westgate Street, Gloucester GL1 2TP

Tel: 01452 328674

Email: [stephen.chandler2@gloucestershire.gov.uk](mailto:stephen.chandler2@gloucestershire.gov.uk)

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**From:** jan@efm-ltd.co.uk [mailto:jan@efm-ltd.co.uk]

**Sent:** 07 December 2020 16:52

**To:** CHANDLER, Stephen

**Cc:** Ian Kirby; THOMAS, Sophie

**Subject:** Appeal Reference APP/B1605/W/20/3261154 - Proposed Development on Land adjacent Oakhurst Rise, Cheltenham - LPA Ref. 20/00683/OUT

Dear Stephen

Thank you for your reply of 1 December 2020, explaining the calculation of 7 per 100 eligible dwellings for Post -16.

In response to my request for a formal response to the points made in my email of 30 June 2020, your email refers me to GCC's formal response of 4 June 2020. It was, of course, this email that gave rise to my email of 30 June.

Am I right in inferring from your reply that you are unwilling to provide any further formal response to the points made in my email of 30 June? I summarise the points in my email as follows:

- a) Schools data only provided for the nearest schools, and primary potentially being over-capacity due to popularity;
- b) Primary school demand forecast to fall (at least 5 surplus places forecast by 2023/24) and questioning GCC's reliance on lack of a 5-10% surplus as justification for a full contribution;
- c) Additional surplus capacity also forecast for the primary planning area, based on DfE published information;
- d) Lack of a primary school project, and conclusion that the additional pupils would be able to be accommodated within the area;
- e) Lack of a secondary school project and surplus capacity forecast for the secondary school planning area;
- f) Pressure on places from new development acknowledged and a new school being planned that will add an additional 900 places from 2021/22. Clarification about pupil forecasts sought;
- g) Clarification sought about planning obligation arrangements, to account for the final dwelling mix and indexation provisions;
- h) Concern regarding GCC's pupil product ratios (PPRs), noting the concerns raised by those responding to the LDG Refresh. Three particular points were raised:

- PPRs being based on children resident not on additional demand for state school places, and that the PPR work did not use information collected about previous place of residence, and schools attended before and after the moving;
- No account being taken of wider population changes affecting the demand for school places. Reference was made to GCC's own Population Profile information for the period 2016 to 2041 – which suggests growth of just 2.6% in the 0-19 age population over that period;
- An apparent error in the Post-16 calculations;

About the Post-16 PPR calculation, you have accepted the PPR was incorrectly calculated, and have recalculated the contribution sought. Pursuant to my query you have now confirmed the detail of your recalculation. While your further explanation is helpful, unfortunately, I believe the calculation is still incorrect.

Firstly, I have done a sense check on the figure - comparing your calculated PPR of 7 pupils per 100 relevant dwellings with my 'rough and ready' figure of 2.4 per 100 dwellings - which equates to about 2.7 per 100 relevant dwellings based on the appeal scheme mix. Similarly, I calculate a figure of 2.33 per 100 relevant dwellings, based on the figures published in the adopted Local Developer Guide calculation and an average 50% stay-on rate. These comparisons suggest that the figure of 7 per 100 dwellings must be wrong. That your PPR is so much higher than that is currently evident across Gloucestershire as a whole should be a concern to you, in my view.

Secondly, if I understand correctly, you have used three whole age groups to calculate your Post-16 PPR. You have then applied the percentage who were reported as being still at school. However, there are only two age groups in sixth forms, so I believe your base figure is incorrect. Furthermore, the 71% you have applied is based on the percentage reported as being still in school. However, because you have used three age groups, as well as those in Years 12 and 13 some children in Year 11 will be included. Year 11 children should be 100% reported as being still at school. Therefore, instead of accurately calculating the percentage you are seeking (the participation percentage for Years 12 and 13) the percentage has been artificially boosted by including Year 11 children. (Example for illustrative purposes only - Assume the survey includes 150 dwellings and the child count is as follows: 50 Year 11 children reported as 100%, 50 Year 12 children reported as 50% and 50 Year 13 children reported as 50%. The result of your approach would conclude 100 out of 150 children at school = 67%, and give a PPR of  $100/1500 \times 100 = 6.67$  per 100 dwellings. The correct answer would be 50 out of 100 children at school = 50%, and the PPR would be  $50/1500 \times 100 = 3.33$  per 100 dwellings.)

Thirdly, I believe the survey may well be biased, due to the construction of the questionnaire. I believe it was obvious to those receiving it that the questions were mostly about children, so those without children may well have been less inclined to respond. Were any statistical checks undertaken to address this potential bias? Or, were any cross-checks made against the pupil data held by GCC? I cannot recall seeing any information about how households were invited to take part, but my reading of the report suggests respondents self-selected (point 2.4, second paragraph).

Fourthly, I note from point 2.6 of the report that larger (3 and 4+ bed) properties were over-represented in the survey - although the second paragraph refers to the 4+ beds target being 30%, while the table says 25%. 4+ beds are substantially over-represented either way. It seems reasonable to assume that larger properties would include more Post-16 age children. Therefore, I expected the effect of weighting to produce a reduction in Post-16 children. However, the effect of weighting is to increase the PPR figure from 7 to 11 per 100 dwellings - a 57% increase - as shown in Table 3. This appears counter-intuitive to me.

In my view, since you are calculating a figure to be used county-wide and especially in the light of the apparent difficulties outlined above, it would make more sense to use the county wide stay-on rate for Post-16.

The above points are not new. They have been highlighted in responses to the LDG Refresh, including my own conclusions (submitted through the representation made on behalf of Sharpness LLP) which were as follows:

"5.1. Unfortunately, the proposed update to the LDG is flawed. Use in its current form would create unnecessary and unhelpful conflict, and would hinder development, which is clearly not GCC's intention.

"5.2. The principle concern for most developers, and local planning authorities which have their own requirements, will be the proposed PPRs. These would impose substantial additional financial burdens on development. Put simply, GCC appears to have been misled into using PPR figures that do not properly represent the additional demands likely to be imposed by development.

"5.3. The guide needs further consideration before it can be used, and EFM would be very willing to be involved in any informal discussions about how to progress with the update of the guide in the light of the responses received by GCC. If any additional information about this response would be helpful, please do not hesitate to contact the author."

I confirm that EFM remains very willing to be involved in discussions about the update of the guide, in the interests of reducing unnecessary conflict and delay. Likewise, in respect of this application, a negotiated agreement would be preferable to a unilateral undertaking and I remain open to further discussions.

I look forward to hearing from you.

--

Regards,

Jan Kinsman

EFM (Educational Facilities Management Partnership Limited) Mobile: 07841 583256 Landline: 01920 877188

email: [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk)

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**Additional Information provided by GCC Libraries and Information Services  
Land adjacent to Oakhurst Rise, Cheltenham. App Ref: 20/00683/OUT**

22 December 2020

**(With paragraph numbering added on 20 Jan 2020)**

1. Please find below additional information from GCC Library and Information Service to address queries which have been raised by the Appellant's agent regarding the justification for the request for a planning obligation of £8,428 towards local library provision.

**Background**

2. Under the provisions of the Public Libraries and Museums Act 1964 ('the PLMA'), GCC is a Library Authority and has a statutory duty (as opposed to a discretionary power) to provide a comprehensive and efficient library service for all persons desiring to make use of it. This duty applies not only to the existing population of the County, but also to new residents generated through new development which add to the demand on a specific library which those new residents can be expected to use. Thus, the duty applies to the appeal proposal.
3. The Library Authority's representations submitted to the LPA in June 2020 included a request for a planning obligation of £8,428 towards local library provision which would be used towards '*expansion, increased opening hours/stock and improved facilities*' to mitigate the impact of the proposed development.
4. Policies INF4 (Social and Community Infrastructure) and INF6 (Infrastructure Delivery) of the Joint Core Strategy support this requirement. This planning obligation would in turn allow GCC to meet its statutory responsibility to the prospective new residents under the provisions of the PLMA, and would assist in achieving the underlying principles and overarching outcomes set by the Library Authority in its Library Strategy, 2012, including: '*Libraries which reflect local needs and can respond effectively to changes in demand*'.
5. For context, it should be noted that planning obligations are the Library Authority's principal source of external funding for library works to meet increased demand arising from new development. As with all other Library Authorities across the country, GCC does not receive funding from Central Government to increase library services in order to meet this increased demand. Moreover, opportunities to apply for grant funding from external bodies arise only very infrequently, and there is also no guarantee that a grant application for a library improvement project will be successful. No monies from CIL to-date have been awarded to library projects anywhere across the county and as such this cannot and should not be relied upon as a funding stream.

**Compliance with the CIL Regulation 122 Tests**

6. The requested planning obligation towards local library provision complies fully with the three tests set out at Regulation 122 of the Community Infrastructure Levy

Regulations – i.e. that the planning obligation is ‘necessary’, ‘directly related’ and ‘fairly and reasonably related in scale and kind’ to the appeal proposals. A summary of the key facets of this case are presented below.

7. The planning obligation is **necessary** to make the development acceptable in planning terms and is **directly-related** to the development as it is to be used at a local library to address an additional need generated as a result of the proposed development.
8. The contribution would be used at Charlton Kings Library as the nearest library to the appeal site:
  - Charlton Kings Library – circa 1 miles
  - Cheltenham Library – circa 1.8 miles
  - Prestbury Library – circa 2.1 miles
  - Hesters Way Library – circa 3.6 miles
  - Up Hatherley Library – circa 3.7 miles
9. GCC baseline utilisation and footfall data demonstrates that Charlton Kings Library is already very well used – it is the 6th busiest library in the County (out of 31 libraries) and is recognised as being an important local community asset due to the range of services that it provides in addition to the more traditional stock of books and reference material. Charlton Kings Library had 395 new members in 2019/20, it received 80,924 visits with over 84,000 items of stock being borrowed during the same period.
10. Existing pressure on services would be exacerbated by additional library users generated by the appeal proposals unless its impact can be mitigated. The approach to identifying mitigation measures has been as follows:
  - i) Understanding the baseline position: Annex B (Library space requirements) of the Public Libraries, Archives and New Development: A Standard Charge Approach (May 2010) (MLA) is used to assess the existing physical capacity of the library against the national benchmark of 30 sqm per 1000 population. This compares the existing size of the library and the library catchment population. In this case, Charlton Kings Library has circa 227 square metres of public floorspace, and the population in the library catchment area is 10,548 (as at 2018). Applying the MLA benchmark floorspace standard to this data demonstrates that the existing library is already undersized.
  - ii) Considering options to mitigate the impact of the appeal proposals: To accommodate the demands arising from additional users generated by new development, a financial contribution towards a scheme to extend the building and its physical capacity has been discounted as an option because the existing library could not physically accommodate it due to site constraints and close proximity of the building to neighbouring properties and public realm.

iii) Proposed mitigation: The financial contributions requested by GCC would therefore be used to extend the existing library services that new customers from the appeal proposal would be expected to use – including investment in stock and furniture, and extending IT and digital services and access. Any future scheme that is created to mitigate impact from this development, would fit within the scope of the range of works identified, which in the case of this appeal is the ‘*expansion, increased opening hours/stock and improved facilities*’.

11. In light of all of these considerations it is anticipated that the requested financial contribution of £8,428 would be put towards further increasing stock provision, both physical & electronic, to meet increased demand arising from the development. The internal layout would be reconfigured/optimised in order to accommodate the additional stock and shelving that would be required.
12. Typically, there would also be provision in the legal agreement for the monies to be returned by GCC within five years of payment if it is not spent.
13. The planning obligation is **fairly and reasonably-related** in scale and kind to the development as it is calculated on a proportionate basis using GCC’s established per dwelling charge of £196 for planning applications of 25 dwellings or more (43 x £196 = £8,428).
14. GCC’s approach to planning obligations towards libraries has been tested as recently as late 2019 (APP/G1630/W/19/3229581 in respect of a development at Bishops Cleeve, decision dated 11 November 2019). In that case, the Planning Inspector concluded that the planning obligation complied with each of the CIL Regulation 122 tests. The relevant paragraphs of that decision notice are set out below:

*‘71. In terms of library provision, a contribution of £42,140 is necessary to accommodate the additional need for library resources generated as a result of the development and would be used towards Bishop’s Cleeve Library including capital works, extended opening hours, increased stock, computer resources and new furniture. Policy INF4 of the JCS supports this requirement. The Bishops Cleeve Library is the nearest library to the development and the contribution is based on a calculation of £196 per dwelling multiplied by the number of dwellings. I consider the provision would be fairly and reasonably related in scale and kind to the development’.*

### **GCC’s Policy Documents**

15. The Library Strategy (2012) was prepared at a time of significant council budgetary pressures and early technological change, recognising that services evolve according to technological innovations in providing books and information services, the needs of Gloucestershire people and, the council resources available to meet these needs.



16. A new Library Strategy was in the very early stages of development in March 2020 with plans to have had it in place during 2020/21. This work was put on hold due to the COVID 19 pandemic. Running in parallel with the development of the new Strategy, an internal review of GCC's approach to developer contributions towards library provision is also being undertaken.
17. The Library Authority recognises the need for its library facilities and services to continue to adapt and expand in order to serve an increasing population within their respective catchments and to cater for changing demand. The recent COVID pandemic has demonstrated that local communities are using different ways to access our services, with increases seen this year in e-lending stock and other electronic resources.
18. This means that to continue to meet the demands of new developments alternative ways of serving those communities also need to be considered alongside the more traditional physical access and resources.

- **END** -



**Subject:** Re: Proposed Development on Land adjacent Oakhurst Rise, Cheltenham - Appln Ref. 20/00683/OUT - Education  
**From:** "jan@efm-ltd.co.uk" <jan@efm-ltd.co.uk>  
**Date:** 30/06/2020, 12:59  
**To:** Sophie.thomas@gloucestershire.gov.uk  
**BCC:** namsnik@yahoo.com

Dear Sophie

As you may have noticed, my email below did not include the calculation of Post-16 pupil numbers. I apologise for the muddle. Here is the corrected paragraph:

Trying to find a simple way forward on PPRs for this development, which takes account of wider changes, I suggest that a PPR based on existing housing would provide a much better guide to the additional demand that will be experienced in the circumstances of this proposed development. To arrive at a 'rough and ready' indicative figure for the county I have used 2018/19 pupil figures of 47,667 for primary and 32,519 for secondary (**excluding** Post-16), and a 2011 Census figure for households of 254,615. This gives PPRs of 0.187 for primary and 0.128 for secondary -11-16. **The secondary Post-16 pupil figure is 6,071 giving a Post-16 PPR of 0.024.** These PPRs would reduce the expected demand from the development considerably - to 8 primary pupils and **6.5 secondary pupils in total** (43 x the relevant PPRs).

Best wishes,  
Jan

On 30/06/2020 10:33, [jan@efm-ltd.co.uk](mailto:jan@efm-ltd.co.uk) wrote:

Dear Sophie

Thank you for your time when we spoke last week, and also for sending through the additional information in the form of the data sheet.

As I explained, I have been asked by the applicant for the above development, to review the education and library contributions being sought by GCC, and would be grateful for some further information on these matters.

In terms of the base information you have now very helpfully provided on the data sheet, I note that only the closest primary school (Holy Apostles CofE Primary School) and catchment secondary (Balcarras School) are included in the response dated 4 June 2020. Both schools are quite full - the primary school having numbers in excess of theoretical capacity - although this may be the result of popularity rather than local demand in both cases.

In any event, the primary school is forecast to have some surplus places in the future, as noted in the response. The response suggests that because the surplus is "below the recommended 5-10%" a full contribution should be sought. No source for the recommended surplus is given, although I suspect this is a reference to an Audit Commission document which was concerned with removing surplus places and, in that context, was suggesting not to cut places too tightly. Furthermore, the concept of a surplus was not intended to be applied at an individual school level. This is not a reasonable justification of the contribution sought. Furthermore, based on capacity and forecast information published by DfE, additional surplus capacity is forecast to become available within the wider primary planning area.

No details are provided of a project to which the primary education contribution sought would be put, and it is suggested that there should be scope for expenditure anywhere within the primary planning area. My conclusion is that the 11-12 pupils (calculated in my view on the basis of an unreasonably high PPR) will be able to be accommodated within the primary planning area, and therefore no contribution should be sought in this case. I appreciate there may be additional factors about which I am unaware, and I am happy to consider further information as might be considered relevant.

So far as secondary is concerned, leaving aside for a moment the matter of PPRs (on which I comment further below), the contribution sought is for the wider planning area, and no specific project has been identified. Referring again to DfE published capacity and forecast information, it is apparent that there is a considerable amount of surplus capacity within the secondary planning area. However, pressure on places is being experienced or expected, as larger numbers in primary schools transfer into secondary schools alongside some major housing sites around the town, and a new school is planned that will add 900 places in 2021/22. With this additional capacity, which I understand is already funded through an existing s106, it is unclear whether there will be a shortfall in capacity. Further clarification would be helpful, concerning the forecasts and what is included in them.

To the extent that additional capacity may be needed, the contributions sought reflect a cost per place and an assessed number of places. As the application is in outline, I understand the planning obligation agreement would include an adjustment mechanism to cater for the possibility that the number and mix of dwellings might vary from the that currently indicated and assessed. Indeed, as I understand it, the proposal has been amended such that a fifth one-bed dwelling is now planned, reducing the number of qualifying dwellings to 38 - I will double check this.

I understand from our conversation that the costs per place, stated at the top of page 4 in the response dated 4 June, are to apply from the date of the agreement until the date of payment - assuming the planning obligation is signed in the current financial year. Have I understood that correctly? Or, if not, please clarify further.

The second factor is the number of pupils which is derived from the dwelling mix and Pupil Product Ratios (PPRs). When we spoke last week I summarised some concerns about the results of GCC's new PPRs. I and others have expressed a multitude of concerns through our responses to the recent Local Developer Guide Consultation, and I appreciate that it may be some time before GCC is in a position to consider all responses in detail. However, in the context of my Client's current proposals I believe it is important that some of the more substantial concerns are addressed. In the interests of trying to keep matters simple I will focus on three key concerns relevant to assessing impact of the proposed development:

a) The PPRs have been derived from surveys of children resident, and applying the PPRs provides the potential number of children resident. It does not provide a figure for the additional demand for state funded schools. Although questions were asked in the surveys about previous place of residence, and where children attended school at the time of the survey and before moving house, it does not appear that this information was used in compiling the PPRs. Thus it is assumed that all children resident are new and additional children requiring additional school places. This is incorrect as a number are likely to have moved locally, particularly in the case of secondary age pupils where school catchments and planning areas are generally larger.

b) Families do not only move into new housing, and no account is taken of wider population changes that will also affect demand for school places. The general trend is for

decreasing household size over time. Table 3 of GCC's Population Profile (2019) suggests growth in the 0-19 population age group, between 2016 and 2041, will be modest at 2.6% in Cheltenham - see <https://www.gloucestershire.gov.uk/media/12777/equality-profile-2019-final.pdf>

c) Thirdly, the PPR for secondary 16-18 appears to be incorrectly calculated. The secondary 11-16 factor is 0.20 and relates to five academic year groups (Year 7 to Year 11 inclusive). The 16-18 (or Post-16) age group should relate to two academic year groups, in addition to which pupils in this age group do not have to stay on at school - and normally around 50% stay on. Thus the factor for Post-16 should be about one fifth of the 0.20 that applies to 11-16. This would be 0.04, not the figure of 0.11 currently used. To check this, I have calculated the average stay on rate in Gloucestershire from DfE published data for school year 2018/19. This showed: 32,519 pupils in Years 7 to 11; 3,127 in Year 12; and 2,944 in Year 13. This shows Post 16 was 18.67% of Years 7 to 11, or just less than on fifth. I conclude there must be a mathematical error in the calculation of the PPR for 'Secondary - 16-18'.

Trying to find a simple way forward on PPRs for this development, which takes account of wider changes, I suggest that a PPR based on existing housing would provide a much better guide to the additional demand that will be experienced in the circumstances of this proposed development. To arrive at a 'rough and ready' indicative figure for the county I have used 2018/19 pupil figures of 47,667 for primary and 32,519 for secondary (including Post-16), and a 2011 Census figure for households of 254,615. This gives PPRs of 0.187 for primary and 0.128 for secondary. These PPRs would reduce the expected demand from the development considerably - to 8 primary pupils and 5.5 secondary pupils (43 x the relevant PPR).

In summary, my current thoughts are as follows:

Primary - demand for places at the nearest school and in the planning area is expected to decline over the next few years and I believe the demand from the development can be accommodated without additional provision being made. A contribution is therefore not necessary.

Secondary - Clarification would be helpful, as indicated above. If a contribution is appropriate a more realistic PPR should be used.

I am keen to understand whether we are likely to be able to reach agreement on any of these matters, and would appreciate your thoughts on this as soon as possible.

I will write separately about the library contribution sought.

If you have any queries about the above, or you think it might be useful to discuss any aspect, please do not hesitate to call me.

--

Regards,

Jan Kinsman

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**EFM Updated Calculation of Pupil Yield and ‘Sense Check’**

1. This appendix details the calculation of the updated pupil yield figures shown in Table 3 and Figure 1 at paragraph 3.22. I have taken an authority-wide approach, as has GCC.
2. Pupil numbers on roll are taken from January school census (PLASC) information for mainstream schools for academic years 2011/12 to 2019/20.

January PLASC	2012	2013	2014	2015	2016	2017	2018	2019	2020	9 year total
Primary	41684	42433	42811	44441	45505	46623	47305	47524	47409	405,735
Secondary	32794	32505	31643	31551	31381	31414	31818	32519	33274	288,899
Post-16	6476	6413	6612	6432	6422	6444	6256	6070	6030	57,155

*Table A Pupils in Gloucestershire Mainstream Schools*

3. For the purposes of calculating pupil numbers, GCC defines qualifying dwellings as those with two or more bedrooms without any occupancy restriction for age or health reasons.
4. 2011 Census data (Table QS411EW) shows the number of bedrooms available to each household. For Gloucestershire the total number households was 254,615 of which 228,500 (89.74%) had two or more bedrooms. I have assumed this can be taken as the number of qualifying dwellings in 2011 for my purposes. This figure excludes dwellings that had no usual residents at the time of the Census, such as vacant dwellings and second homes.
5. Additional dwellings have been built since 2011, and I have taken information for net housing completions from district housing monitoring reports, for 2011/12 to 2019/20 as shown in Table A1, below:

Housing Year	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
Cheltenham	36	266	413	316	397	296	594	776	402
Cotswold	528	393	400	503	597	755	911	806	599
Forest of Dean	183	144	268	286	234	165	187	192	263
Gloucester	593	430	476	554	470	439	487	544	467
Stroud	402	406	477	573	430	356	501	564	361
Tewkesbury	319	463	517	567	630	730	933	981	439
Total	2,061	2,102	2,551	2,799	2,758	2,741	3,613	3,863	2,531

*Table B Additional Dwellings in Gloucestershire April 2011 – March 2019*

Appendix 3 – EFM Updated Calculation of Pupil Yield and ‘Sense Check’

6. For the final year of housing data (2019/20) figures are available only from three districts. The figures for the other districts have been estimated as 19.51% of completions in 2015-2019. This percentage is calculated from the three districts that have published figures, and estimated figures are shown in italics in the Table B above.
7. Based on the 2011 Census figure, I have assumed that the percentage of additional dwellings with two or more bedrooms is 89.74% of the total each year.
8. School Census information relates to January of the school year. To obtain a January qualifying dwellings figure it has been assumed that 75% of annual housing completions have taken place by the end of December. So that the number of dwellings relative to the January 2012 PLASC school roll figure is the Census-based housing figure of 228,500 plus 75% of the 2011/12 housing figure of 1,801 which is 1,351. Table C shows the derivation of January qualifying dwelling figures.

Housing Year	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
Additional dwellings	2,061	2,102	2,551	2,799	2,758	2,741	3,613	3,863	2,531
87.4% of Total	1,801	1,837	2,230	2,446	2,410	2,396	3,158	3,376	2,212
75% of above	1,351	1,378	1,672	1,835	1,808	1,797	2,368	2,532	1,659
January qualifying dwellings	229,851	231,679	233,811	236,203	238,622	241,022	243,989	247,310	249,814

Table C January Qualifying Dwellings Figures

9. PPRs are then calculated for each year and as an average over the period, as shown in Table D:

January	2012	2013	2014	2015	2016	2017	2018	2019	2020	9 year total
Primary	41684	42433	42811	44441	45505	46623	47305	47524	47409	405,735
Secondary	32794	32505	31643	31551	31381	31414	31818	32519	33274	288,899
Sixth Form	6476	6413	6612	6432	6422	6444	6256	6070	6030	57,155
Qualifying dwellings	229,851	231,679	233,811	236,203	238,622	241,022	243,989	247,310	249,814	2,152,300
Primary PPR	18.1	18.3	18.3	18.8	19.1	19.3	19.4	19.2	19.0	<b>18.85</b>
Secondary PPR	14.3	14.0	13.5	13.4	13.2	13.0	13.0	13.1	13.3	<b>13.42</b>
Post-16 PPR	2.8	2.8	2.8	2.7	2.7	2.7	2.6	2.5	2.4	<b>2.66</b>
Overall PPR	35.2	35.1	34.7	34.9	34.9	35.1	35.0	34.8	34.7	34.93

Table D Calculation of PPRs



Appendix 3 – EFM Updated Calculation of Pupil Yield and ‘Sense Check’

10. As ‘sense check’ on alternative PPR figures the percentage change in dwellings and pupils since 2012 has been calculated plotted on three alternative bases. Firstly, actual change:

January	2012	2013	2014	2015	2016	2017	2018	2019	2020
Qualifying dwellings	229,851	231,679	233,811	236,203	238,622	241,022	243,989	247,310	249,814
Additional QDs	0	1828	2131	2392	2419	2399	2967	3322	2503
Primary	41684	42433	42811	44441	45505	46623	47305	47524	47409
Secondary	32794	32505	31643	31551	31381	31414	31818	32519	33274
Sixth Form	6476	6413	6612	6432	6422	6444	6256	6070	6030
Total Pupils	80954	81351	81066	82424	83308	84481	85379	86113	86713
Qualifying dwellings	0.0%	0.8%	1.7%	2.8%	3.8%	4.9%	6.2%	7.6%	8.7%
Primary pupils	0.0%	1.8%	2.7%	6.6%	9.2%	11.8%	13.5%	14.0%	13.7%
Secondary pupils	0.0%	-0.9%	-3.5%	-3.8%	-4.3%	-4.2%	-3.0%	-0.8%	1.5%
Post-16 pupils	0.0%	-1.0%	2.1%	-0.7%	-0.8%	-0.5%	-3.4%	-6.3%	-6.9%
Total Pupils	0.0%	0.5%	0.1%	1.8%	2.9%	4.4%	5.5%	6.4%	7.1%

Table E Percentage Change in Qualifying Dwellings and Pupil Numbers

11. Table E shows that, alongside an increase in dwellings of 8.7% over the 8 year period, primary pupil numbers increased considerably more, while secondary pupil numbers increased marginally and Post-16 pupil numbers actually dropped. The main reason for this is due to variation in the birth rate, which fluctuates from year to year.

12. Below is a graphical representation of the percentage figures in Table 3.

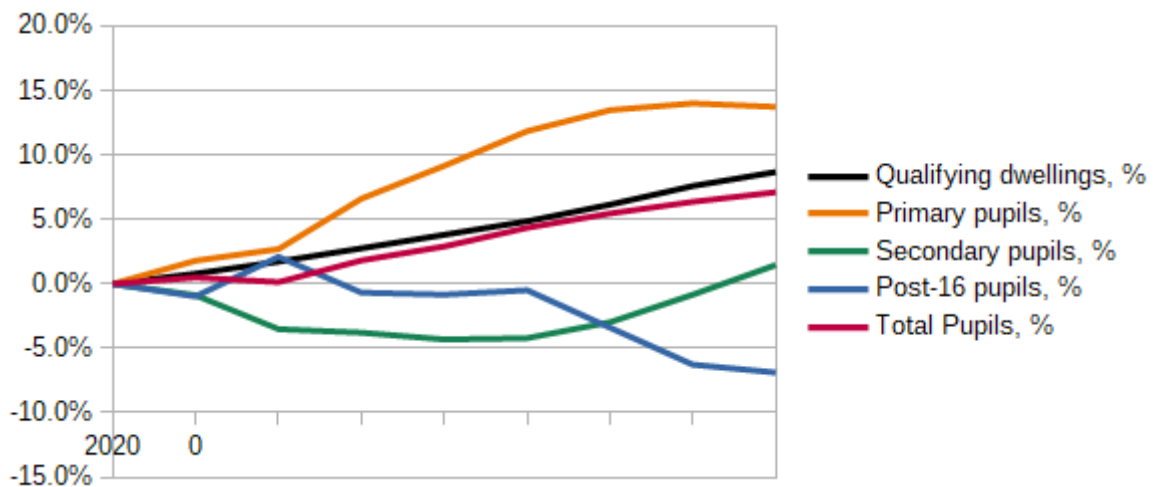


Figure A Percentage Change in Qualifying Dwellings and Pupils

13. If GCC’s PPRs were correct, and the number of pupils from existing housing remained constant, the following changes would have been expected:

Appendix 3 – EFM Updated Calculation of Pupil Yield and ‘Sense Check’

Year	2012	2013	2014	2015	2016	2017	2018	2019	2020
Additional QDs	0	1828	2131	2392	2419	2399	2967	3322	2503
Primary pupils	41684	42434	43307	44288	45280	46264	47481	48842	49869
Secondary pupils	32794	33160	33586	34064	34548	35028	35622	36286	36787
Post-16 pupils	6476	6604	6753	6921	7090	7258	7466	7698	7873
Total Pupils	80954	82197	83647	85273	86918	88550	90568	92826	94529
Primary pupils	0.0%	1.8%	3.9%	6.2%	8.6%	11.0%	13.9%	17.2%	19.6%
Secondary pupils	0.0%	1.1%	2.4%	3.9%	5.3%	6.8%	8.6%	10.6%	12.2%
Post-16 pupils	0.0%	2.0%	4.3%	6.9%	9.5%	12.1%	15.3%	18.9%	21.6%
Total Pupils	0.0%	1.5%	3.3%	5.3%	7.4%	9.4%	11.9%	14.7%	16.8%

*Table F Change and Percentage Change in Pupil Numbers – GCC PPRs*

14. In Table F, and Table G below, the number of pupils is calculated by multiplying the number of additional dwellings in the year to January by the relevant pupil factor. For example, in Table F for 2013, 1828 additional dwellings multiplied by the GCC’s Post-16 factor of 7 pupils per 100 dwellings produces an additional 128 Post-16 pupils. These are added to the 2011 figure of 6476 to give a 2013 figure of 6604.
15. If EFM’s updated PPRs were correct, and the number of pupils from existing housing remained constant, the following changes in pupil numbers and percentages would have been expected:

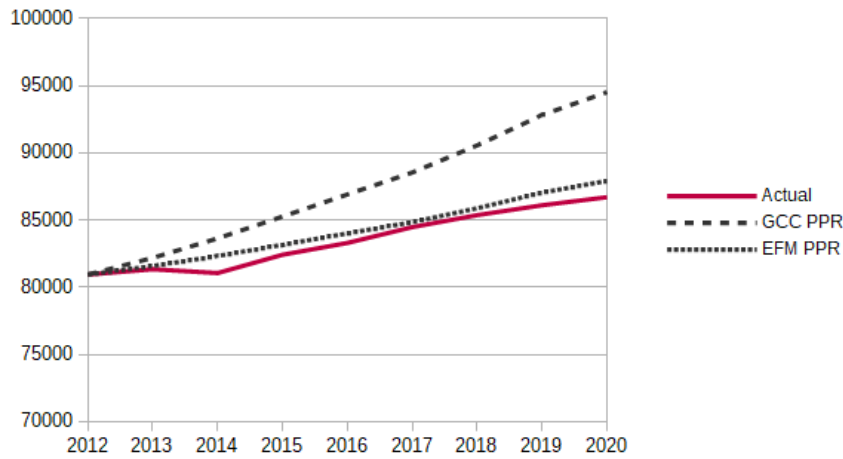
Year	2012	2013	2014	2015	2016	2017	2018	2019	2020
Additional QDs	0	1828	2131	2392	2419	2399	2967	3322	2503
Primary pupils	41684	42029	42430	42881	43337	43790	44349	44975	45447
Secondary pupils	32794	33039	33325	33647	33971	34293	34692	35138	35474
Post-16 pupils	6476	6525	6581	6645	6709	6773	6851	6940	7006
Total Pupils	80954	81593	82337	83173	84018	84856	85892	87053	87927
Primary pupils	0.0%	0.8%	1.8%	2.9%	4.0%	5.1%	6.4%	7.9%	9.0%
Secondary pupils	0.0%	0.7%	1.6%	2.6%	3.6%	4.6%	5.8%	7.1%	8.2%
Post-16 pupils	0.0%	0.7%	1.6%	2.6%	3.6%	4.6%	5.8%	7.2%	8.2%
Total Pupils	0.0%	0.8%	1.7%	2.7%	3.8%	4.8%	6.1%	7.5%	8.6%

*Table G Change and Percentage Change in Pupil Numbers – EFM PPRs*

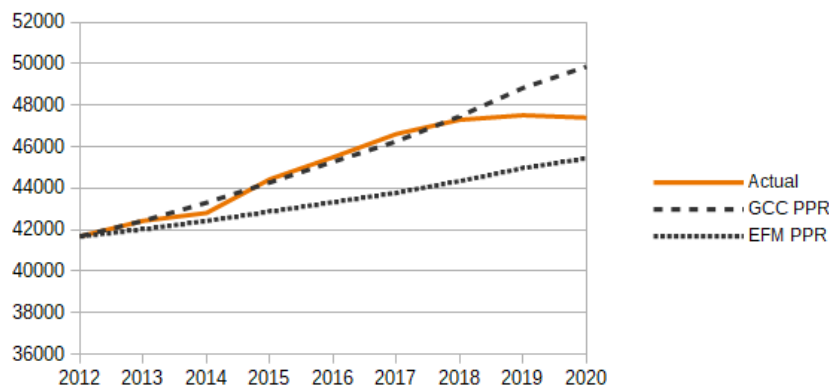
16. I have shown the above results graphically in the figures below/overleaf:

## Appendix 3 – EFM Updated Calculation of Pupil Yield and ‘Sense Check’

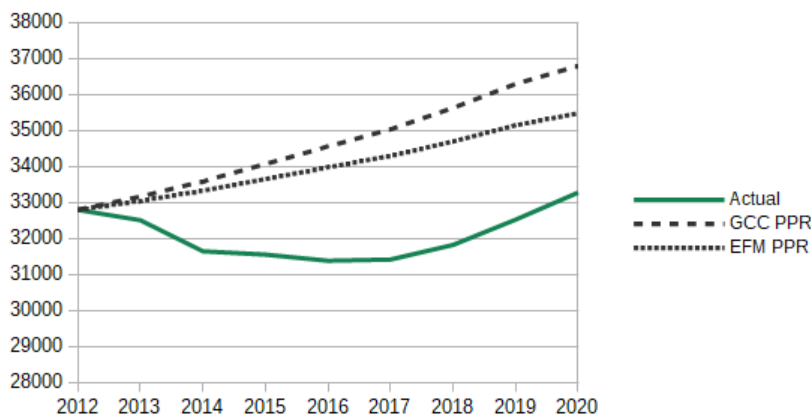
### i) All pupils



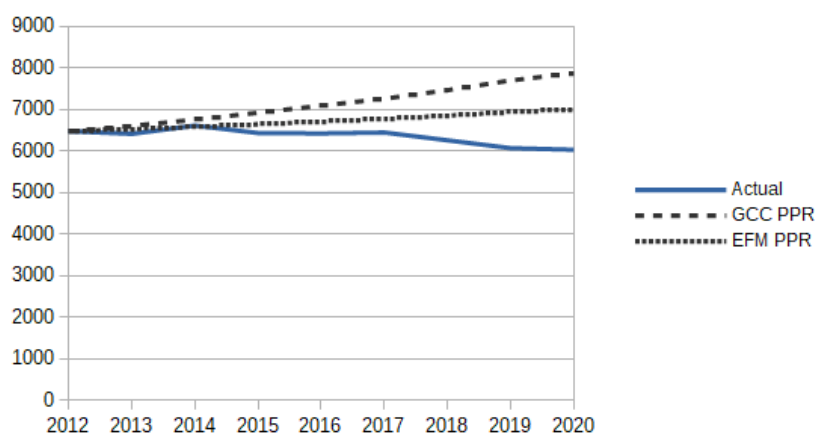
### ii) Primary Pupils



### iii) Secondary pupils



### iv) Post-16 pupils





Library	Catchment Population (2019)	Total Internal Room Area in sqm	Total Public Area in sqm (public space)	Total Internal Room Area - sqm per 1,000 population	Total Public Area – sqm per 1,000 population	Total Area Ranking	Public Area Ranking	Active Borrowers with library as home site (2019)	Number of Active Borrowers who have only borrowed from this library site (2019)	Number of Active Borrowers who have borrowed from home site and other library sites (2019)	Opening Hours per week (pre Covid)
Moreton	6430	313.21	143.39	48.71	22.30	1	6	721	538	183	24
Longlevens	9342	434.97	397.24	46.56	42.52	2	1	2561	1968	593	35
Gloucester	37970	1428.86	868.39	37.63	22.87	3	4	4668	2753	1915	54
<b>Charlton Kings (see Note 2)</b>	<b>10564</b>	<b>321.61</b>	<b>237.28</b>	<b>30.44</b>	<b>22.46</b>	<b>4</b>	<b>5</b>	<b>2158</b>	<b>1589</b>	<b>569</b>	<b>35</b>
Fairford	10908	325.38	257.28	29.83	23.59	5	3	853	719	134	28
Stow on the Wold	8004	223.61	195.14	27.94	24.38	6	2	819	615	204	40
Chipping Campden	8478	215.53	177.22	25.42	20.90	7	7	768	679	89	28
Wotton under Edge	8875	218.45	153.41	24.61	17.29	8	11	720	578	142	22
Prestbury	10992	270.48	214.44	24.61	19.51	9	9	994	539	455	18.5
Hesters Way	19519	474.62	293.92	24.32	15.06	10	13	767	433	334	21
Stroud	46845	1015.43	500.78	21.68	10.69	11	23	4289	3149	1140	44
Winchcombe	9179	189.2	159.31	20.61	17.36	12	10	1126	859	267	28
Tetbury	9068	184.8	134.52	20.38	14.83	13	15	796	646	150	28
Bishops Cleeve (see Note 1)	20144	403.44	344.98	20.03	17.13	14	12	2813	2283	530	41+
Dursley	25069	500.49	285.05	19.96	11.37	15	22	2098	1790	308	44
Nailsworth	13287	255.95	190.26	19.26	14.32	16	16	1144	728	416	22
Cheltenham (Main building)	54511	841.18	594.68	23.01	16.92	17	8	6346	2810	3536	54
Cheltenham (Phase 1 Building)		413.35	327.66								54
Tewkesbury	33887	629.87	503.27	18.59	14.85	18	14	2455	2067	388	44
Newent	16495	286.02	221.5	17.34	13.43	19	17	1420	1174	246	40
Tuffley	14963	224.91	180.63	15.03	12.07	20	19	753	462	291	21
Coleford	15917	238.8	201	15.00	12.63	21	18	1574	1271	303	40
Cirencester	38696	570.04	443.06	14.73	11.45	22	21	3266	2867	399	44
Up Hatherley	22876	323.49	235.38	14.14	10.29	23	24	2166	1497	669	38.5
Matson	10626	146.97	123.08	13.83	11.58	24	20	510	269	241	21
Lydney	26571	337.63	272.96	12.71	10.27	25	25	1124	873	251	35
Quedgeley	27604	325.05	258.44	11.78	9.36	26	26	2773	2039	734	35
Hucclecote	36918	337.27	279.54	9.14	7.57	27	27	2534	1810	724	35
Cinderford	27808	230.21	194.4	8.28	6.99	28	28	1107	783	324	35
Bourton on the Water	8278	61.75	45.76	7.46	5.53	29	30	606	402	204	15
Churchdown	26950	197.83	179.06	7.34	6.64	30	29	1352	921	431	28
Stonehouse	20296	135.62	107	6.68	5.27	31	31	503	253	250	12
<b>All libraries</b>	<b>637070</b>	<b>12076.02</b>	<b>8720.03</b>	<b>18.96</b>	<b>13.69</b>			<b>55784</b>	<b>39364</b>	<b>16420</b>	

Note 1 – Bishops Cleeve Library is open for 41 hours with staff, and is also open unstaffed for 27.5 hours through a scheme called Open+

Note 2 – for Charlton Kings Library, the Total Public Area in this table includes a public entrance lobby