

WARWICK DISTRICT LOCAL PLAN

Examination Statement

Matter 7b – Proposed Housing Site Allocations - Kenilworth

Statement Prepared by:

Savills

For:

GLEESON DEVELOPMENTS LTD

Respondent Reference Number: 5117

Introduction

- 1.1 Savills acts on behalf of Gleeson Developments Ltd (Gleeson).
- 1.2 Gleeson controls the land at Southcrest Farm, to the east of Kenilworth. The land is identified in the Main Modifications as part of site H40 along with Crewe Lane and Woodside Training Centre. Representations have previously been submitted to the Council highlighting the lack of constraints on this land, its suitability for residential development and its deliverability. Technical surveys have been produced for the site which demonstrate its deliverability.
- 1.3 The Issue identified by the Inspector in respect of Matter 7b is:

“Whether the proposed housing site allocations at Kenilworth are justified, effective and consistent with national policy.”
- 1.4 Using the same numbering as in the Matters and Issues document we set out below a response to the questions that are relevant to our case. Representations were duly submitted to the Submission Draft Plan and Main Modifications. This statement should be read in conjunction with these representations especially in relation to the issue regarding the designation of land at Southcrest Farm under Policy ED2 and DS11. Policy ED2 is the subject of questions under Matter 8 of the Examination but will be touched on below as necessary.

Questions

1) What is the current planning status of the site?

- 1.5 Southcrest Farm forms part of Site H40. Southcrest Farm is under the control of Gleeson. Gleeson has been promoting the land for a number of years. Land at Southcrest Farm is in part agricultural and part residential uses and extends to circa 18.2 hectares. The land is currently designated as Green Belt. The Green Belt designation extends to all of the land outside the built up area of Kenilworth.
- 1.6 In respect of the wider H40 designation, land at Crewe Lane, is also in agricultural use and is in the Green Belt. Land at Woodside Training Centre is a residential training centre and includes a main building and surrounding grounds. There is a Scheduled Ancient Monument to the east of the Training Centre, straddling the A46 dual carriageway. The land is also within the Green Belt.

2) How does it fit within the overall spatial strategy?

- 1.7 Kenilworth is considered an appropriate and highly sustainable location for development to help meet the overall housing need for Warwick District. The Local Plan supports the status of

Kenilworth due to its existing services and facilities coupled with its proximity to Leamington Spa and Coventry.

- 1.8 Kenilworth is proposed to accommodate circa 1,880 dwellings of Warwick District's housing need. Site H40, of which Southcrest Farm forms part of, is proposed to accommodate 640 dwellings.
- 1.9 Site H06 (East of Kenilworth (Thickthorn)) is located adjacent to site H40 to the east is allocated to deliver 760 dwellings.
- 1.10 Part of site H40 is also proposed to be designated for the amalgamation and expansion of Kenilworth School. Our previous representations have raised issues about the specific allocation of a site. This approach has not been specified on any other strategic site within the Local Plan and appears to be a result of an earlier allocation of the land for just a school.
- 1.11 Whilst education matters are the subject of Matter 8 of this Examination, it is important to discuss the education allocation on site H40 given that the policy states that any remaining land will be allocated for housing development.
- 1.12 We attach at Appendix 1 of this statement a report by Education Facilities Management (EFM) that also addresses the questions under Matter 7b.

3) In addition to housing provision, are there other benefits that the proposed development would bring?

- 1.13 As set out in Policy DS11, Site H40 will provide a new secondary school and community facilities. Along with other strategic sites, Policy DS15 sets out that Development Briefs will need to be prepared. Gleeson supports the principle of a comprehensive approach to development, as this delivers high quality and integrated design particularly on sites of more than 200 dwellings. Site H40 and Site H06 combined meets this criterion resulting in 1,400 dwellings, plus 8 hectares of employment along with the required infrastructure and will ensure integrated development.

4) What are the potential adverse impacts of developing the site? How could they be mitigated?

- 1.14 It is inevitable that any development will have some impact on local road networks. However, following an initial transport review of the land at Southcrest Farm a series of measures has been identified that will effectively mitigate the increased level of traffic generated from the development. The review also concluded that safe and adequate access can be provided off Glasshouse Lane.

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- 1.15 Development at Southcrest Farm will not have any impact upon the threat of flooding of homes and businesses in the area and drainage from the site is possible via the local drainage network.
- 1.16 The land currently has limited ecological potential due to the farming activities on the site. Any new development will be able to enhance the habitat through improved open spaces and landscaping. Any development will work with the existing network of hedgerows and trees to provide high quality spaces for wildlife.
- 1.17 Any development around an existing settlement such as Kenilworth must respect the character and appearance of the environment in to which it will be built. Southcrest Farm is well screened from the existing urban area by wide grass margins and existing trees and hedgerows. The overall visual impact on existing residential areas to the west will be minor.
- 1.18 Please refer to the statement at Appendix 1 by EFM which refers to the impacts of the proposal on education provision.

5) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 1.19 From the technical work carried out there are no exceptional physical constraints to development at Southcrest Farm or indeed to the wider H40 allocation.
- 1.20 There are significant costs associated with the relocation and expansion of Kenilworth School to the site, including the need to purchase the land. The precise area of land, level of costs and sources of funding for the school are currently unknown. Gleeson has been in discussions with the School and Warwick District Council regarding the delivery of the School and agreement for the land over a long period of time. To date no agreement is in place.
- 1.21 This issue will be discussed in greater detail within Matter 8 of the Examination.

6) Is the site realistically viable and deliverable?

- 1.22 Delivery of site H40 for residential development is entirely viable and deliverable. We have raised questions regarding the viability and therefore deliverability of the proposed Secondary School on the site and this will be discussed further under Matter 8 of the Examination.
- 1.23 The two existing school sites (H09 and H12) are proposed to deliver 380 dwellings. However, these are dependant on the relocation of Kenilworth School and Sixth Form to site ED2. Whilst discussions have taken place between Gleeson, Warwick District Council and the School regarding the possible relocation, no agreement has yet been reached. Gleeson is concerned

that there is no evidence of alternative sites having been considered and no evidence on how the school is to be delivered and funded. The new development at Kenilworth will pay in part for the expansion of the school but not its relocation.

- 1.24 As such sites H09 and H12 cannot be relied upon to deliver the 380 dwellings within the plan period. Accordingly, the Local Plan allocations/ policy for the existing two school sites should be amended to acknowledge that these sites can only come forward subject to the school relocating. Southcrest Farm should be considered suitable for this housing if the school does not relocate or amalgamate.
- 1.25 Notwithstanding the above, the relocation of the schools would also cost a considerable amount and it is unclear how this relocation, including land price and build costs, is to be funded. Land Agents at Savills have advised that the release of the existing School sites for residential development would provide insufficient funds to pay for the relocation and there would also be significant cash flow problems as the existing sites could not be released prior to the new school being available for use. It is hoped that the Council will provide evidence for the funding and delivery of the school to the Examination.
- 1.26 An alternative option is to consider the location of a secondary school at Kings Hill Lane (allocation H43) which can accommodate the new housing associated with this allocation and also the expansion needed at Kenilworth School. The site is located within walking/cycling distances subject to improvements.

7) What is the expected timescale for development and is this realistic?

- 1.27 Subject to adoption of the Local Plan confirming the allocation of site H40, Gleeson will pursue a planning application for development on that part of the site under its control as soon as is practically possible. It is not possible today to set out a definitive timescale, but development would be expected to fall within the 5-8 year window taking in to account lead in times for an application and reserved matters. First completions would be expected in circa 2020/21.
- 1.28 Gleeson is in discussions with the promoter of the adjoining land parcels within site H40 and is willing to work collaboratively to bring forward the site as quickly as possible. However, this is dependant on the outcome of the relocation of the school, funding and delivery issues. Further discussions are planned with the School, District and County Council over the coming weeks to progress this issue. In addition, ATLAS, the District and Town Council are coordinating the preparation of a framework plan to enable the site to come forward.

In addition to the above, for all sites apart from H09 (Kenilworth School)

8) What would be the effect of the proposal on the purposes of including land within the Green Belt?

1.29 Whilst there is a need to protect the Green Belt it should be accepted that a large proportion of the District is Green Belt. All the land around Kenilworth is designated as Green Belt and as such a Green Belt review will be required for any development. Inline with Policy DS19, the Council has identified that site H40, including land at Southcrest Farm will be removed from the Green Belt in accordance with the exceptional circumstances set out in the NPPF. This is entirely in accordance with NPPF policy. Southcrest Farm is part of wider Site K4 in the Joint Green Belt Review (2009). The report sets out that this wider site meets 3 of the 5 purposes set out in the Green Belt:

1. It contributes to preventing sprawl from Kenilworth in an easterly direction;
2. It contributes to preserving the setting and special character of Kenilworth; and,
3. Retention of Green Belt land will encourage recycling of derelict and other urban land.

However, this parcel was identified as being one of the 'least constrained' Green Belt parcels around Kenilworth reviewed in 2008 and as such a potentially suitable location for Green Belt release. The parcel scores 11/20 in the Joint Green Belt Review (2015) when considered against the five purposes of the Green Belt. The report considers the parcel is moderate/low in its overall contribution.

9) What would be the effect on the openness of the Green Belt?

1.30 If allocated for development, it is assumed that the land will be removed from the Green Belt and as such the impact on the openness of the Green Belt is not an issue.

10) Are there exceptional circumstances which justify altering the Green Belt? If so, what are they?

1.31 As per Policy DS19 of the Local Plan, the National Planning Policy Framework Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. The land is required to meet the housing and social needs of the District. Alternative locations both outside and within the Green Belt have been investigated and a thorough Green Belt Review has also been carried out. The conclusions of this work have been that the land proposed to be allocated for development is the most appropriate. As such there are exceptional circumstances which justify altering the Green Belt boundary in this part of Kenilworth.

Appendix 1: Education Issues Report by Education Facilities Management (EFM)

Warwick Local Plan Examination

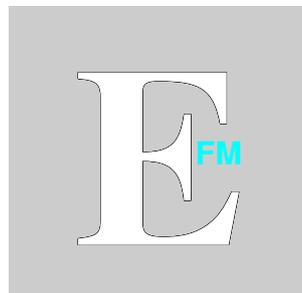
**Matter 7b – Proposed Housing Site Allocations
Kenilworth: Greenfield sites H06 and H40
(Policy DS11 and DS15)**

Education Issues Report

**for
Gleeson Developments Ltd**

Examination Session: Wednesday 19 October 2016

Jan Kinsman



1. Introduction

- 1.1 EFM is appointed by Gleeson Developments Ltd (Gleesons) to advise on education matters arising from Warwick District Local Plan proposals, in particular relating to secondary education and matters raised by the June 2016 Main Modifications in Kenilworth and the surrounding area.
- 1.2 The justification for additional education provision is due to be considered under Matter 8. Housing on the scale now proposed could support a new secondary school.
- 1.3 Kenilworth School is the only secondary school in Kenilworth. Its priority area (catchment) covers the town and surrounding villages and rural area in all directions, including up to the borough boundary with Coventry (which is unitary authority). As of January 2016, Department for Education figures show the capacity of the school as 1,704 and the number of pupils on roll being 1,739. For the purposes of this report, the need for additional primary and secondary education capacity is accepted.

2 Education Considerations

- 2.1 Matter 7b concerns the allocation of housing sites at Kenilworth, including the substantial Greenfield sites H06 (Thickthorn) and H40 (Southcrest Farm, Crewe Gardens and Woodside Training Centre) (Policy DS11 and DS15). H06 was allocated in the Submission Version of the plan (LP23), while H40 has been put forward in the 2016 Proposed Modifications (LP25PM).
- 2.2 Unless for specialist housing, all housing developments lead to demand being put on local education provision. If demands cannot be met by existing or already planned provision then schools need to be expanded or new schools built. Kenilworth School is full to capacity and it is reasonable to expect that any housing within its catchment will lead to extra pressure on places requiring additional capacity to be created.
- 2.3 There are a substantial number of sites allocated within Kenilworth School's catchment, including the sites in and around the town, a number of the more rural sites and Kings Hill Lane (H43). I understand that the total number of dwellings proposed in the catchment, within the plan period to 2029, is about 4,500 - with the prospect of an additional 2,200 at H43 beyond the plan period.
- 2.4 Of the 4,500 dwellings, sites H06 and H40 would provide for 1,400, H43 would provide 1,800 and 1,300 would come from other sites. Based on WCC's usual expectations, 4,500 dwellings could support a new five to six forms of entry school.

- 2.5 Kenilworth School currently operates on two separate sites, with the main school located on site H09 (allocated for 250 dwellings) and the Sixth Form College located on site H12 (allocated for 130 dwellings). The realisation of 380 dwellings on these sites is predicated on the full relocation of Kenilworth School to ED2.
- 2.6 ED2 was initially identified under Policies DS11 and DS12 in the Publication Draft of the plan (LP10).
- 2.7 In the Submission Version, ED2 was deleted from DS11. DS12 deals with allocation of land for secondary education - namely ED1 (partly overlapping with site H01, ED1 is the existing school with adjacent land to facilitate expansion) and ED2 (Southcrest Farm).
- 2.8 Primary school requirements are detailed in Policy DS11.
- 2.9 The 2016 Proposed Modifications (LP25PM) include additional housing sites H40 and H43 (Kings Hill Lane) in Policy DS11. For H40 “New Secondary School” is noted; while for H43 “potentially land for secondary school provision;” is noted. There is no corresponding site in Policy DS12, for H43.

3 The Inspector’s Questions

- 3.1 In relation to all of the housing site allocations within the Kenilworth School catchment, there is an expectation that additional secondary education provision will be required. The overall scale is such that a new school needs to be considered, since Kenilworth School could not accommodate all of the additional demand.
- 3.2 Questions 4 and 5 concern impacts/mitigation and infrastructure requirements/costs and how these would be addressed. For secondary education, the impact of all proposed housing sites in the Kenilworth School catchment area is relevant – not only those in the town.
- 3.3 Whilst the plan appears to identify possible solutions, in allocating ED2 and H43, it is not clear that there is a comprehensive and considered strategy in place. That is not to say there is, or would be, a constraint on development; rather, it should be recognised there is uncertainty about where and how additional secondary places will be provided.
- 3.4 The plan contemplates the possibility of Kenilworth School being relocated to ED2 and expanded to meet additional demand. The relocation would be unconnected with development, but would enable the school to fulfil its aspiration to rationalise on to one site. The expansion element would support new housing development. It is unclear by how much the school might be expanded, and it should be recognised the school is already quite large - and an increase of 200 pupils would make it one of the largest in the country.

- 3.5 My understanding is that discussions have taken place between WBC, Kenilworth School and Gleeson Developments regarding the possibility of relocating the school. However, no agreement has been reached on the terms under which the site might be made available, and it appears unlikely that ED2 would be made available to facilitate the relocation and provide expansion capacity to support valuable housing development in the area unless there is an arrangement to compensate the landowner appropriately.
- 3.6 There does not appear to be any evidence of alternative sites to ED2 being considered. Without the larger allocation of H06 and H40, the location of ED2 may have been seen as having some merits. However, in the context of the allocation sites now proposed there does not appear to be a particular reason to maintain the specifically identified site, and other options could be considered - for example, making use of the existing playing fields.
- 3.7 The relocation would cost a considerable amount – the vast majority of the new building costs. It is unclear how the project is to be funded. It appears unlikely that the release of the existing sites would provide sufficient funds, and there would be significant cash flow implications. The funding of the expansion element also raises questions. These aspects will be more fully addressed in Matter 8, in relation to Policy DS12.
- 3.8 There are other options. One being to relocate only the Sixth Form College, either to the existing main school site or to ED2 - which in this scenario would have the particular benefit of proximity. This would require less new construction and make better use of existing resources. The school would continue to operate on two sites but they would be much closer together.
- 3.9 Another option would be to provide a new school, as is already contemplated, as part of H43. The distance between Kenilworth and H43 is reasonable, and within walking and cycling distance - subject to appropriate improvements. If a decision were taken for a new school on H43, there would be a good argument to establish that school before considering any expansion at Kenilworth School, in order to help gain “critical mass” for the new school at an earlier date.
- 3.10 Whatever option is chosen should ensure the landowner is adequately compensated.
- 3.11 There is a further issue about sites H09 and H12. As noted at paragraph 2.5 above, the realisation of 380 dwellings on sites H09 and H12 is predicated on the relocation of Kenilworth School to an alternative location (question 6). So far as the implications for housing numbers are concerned, if the relocation were not to take place then the housing allocations could be moved to ED2, to the extent that ED2 was not needed to provide education infrastructure. It would be helpful to have clarification of WBC’s assumptions

about the land take for the school and the housing numbers that might otherwise be accommodated on ED2.

4 Conclusions

- 4.1 Additional secondary education provision will be required to support housing growth in the Kenilworth area. Kenilworth School is already full beyond capacity. The housing growth within the catchment of the school indicates a new school will be needed.
- 4.2 A defined site location may be appropriate at Myton, in the circumstances there. However, that approach does not sit well with the extent to which the means of providing additional capacity for the Kenilworth area is currently identified, and the lack of clear strategy. The inclusion of H40 alongside H06 presents the opportunity to consider other options and plan the two sites comprehensively.