

Warwick District Council
Local Plan Examination

Response to Inspector's Matters and Issues

Matter 8 - Other proposed site allocations

Policy DS12 – Land for education

ED1 – Myton

ED2 – Southcrest Farm, Kenilworth

Issue

Whether the proposed site allocations for education, a country park, a community hub and outdoor sport are justified, effective and consistent with national policy.

October 2016

ED1 - Myton

- 1) What is the justification for the proposed allocation? What options were considered and why was this site chosen?**
- a) Warwickshire County Council has the Statutory Responsibility to ensure a sufficient supply of school places. The proposed growth across South Warwick / South Leamington and Whitnash requires a significant increase in the number of secondary school places.
 - b) There are two existing schools serving the wider area, Campion School and Myton School. Both schools are academies and so are outside of County Council control. However, there continues to be good relationships with the schools and the proposals for meeting growth have been developed through collaboration with them.
 - c) The two schools have their own discreet priority areas and a shared area. Warwickshire County Council has looked at the impact the proposed housing growth is likely to have on these three priority areas and has looked at mitigation accordingly.
 - d) A number of options have been considered to provide the additional secondary school places required to support new development:
 - i. Initially consideration was given to the delivery of a new secondary school located towards the middle of the Strategic Urban Extension. The proposed location was equidistant between the existing schools. However, this option was not supported by the existing schools in the area and at that time, the potential to expand existing schools appeared to be more viable
 - ii. The County Council also considered the delivery of a shared post 16 or 14-19 vocational facility as both of these solutions would in turn free up space within the existing schools. This option was not supported for the same reasons a i) above.
 - iii. The Heads and Governors of Campion School and Myton School put forward a proposal which involved the phased expansion of both schools rather than the delivery of an entirely new school. This would preserve the different characters of the schools ensuring that families would have choice. Although both schools would become larger the differential in size would remain with Campion being a smaller option than Myton. Both schools had a history of working well with the County Council and with each other. As a result the planning approval for housing at Europa Way (W/14/1076) set aside land for education in line with the emerging Local Plan. Ultimately this option was not progressed due to the impact of the planning appeal decisions for the Asps and Gallows Hill. These decisions added significantly to the potential pupil numbers across the area and meant that Myton School would be unmanageably large as a result
 - iv. The current proposal seeks to revert to the option of a new school following expansion at Campion (and to an extent) Myton utilising the land set aside for education in the Local Plan (and in application W/14/1076). This has the potential to provide the additional capacity required, and at the same time provide choice without any one school becoming unmanageably large.
 - e) The current proposal was considered by Warwickshire County Council and Warwick District Council and was agreed as the preferred solution. It was recognised that Campion School could be extended on the existing site.

- f) A table showing the pupil impact of the individual approved sites is attached at Appendix 1 for reference. Please note this does not include sites identified within the local plan allocations but not yet approved, which amount to approximately 1250 homes as follows:
- Land at Spring Lane, Radford (60)
 - Gallows Hill (West) (180)
 - Hazelmere and Little Acre (59)
 - East of Whitnash (500)
 - South of Harbury Lane (Severn Trent) (215)
 - South of Harbury Lane (additional area at Lower Heathcote Farm (100)
 - West of Europa Way (50)
 - Court Street (80 approx.)
- g) It also doesn't take account of other applications currently being considered which are not within the local plan allocations, (approximately 150 homes). The most up to date position with regard to these applications will be provided for the hearing session for this matter.

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

- a) The Council's Matter 7a Statement for Land West of Europa Way sets out the potential impacts of developing the adjacent land for housing. Many of the potential impacts for the school are significantly overlapping with this.
- i. **Highways:** The Strategic Transport Assessment assumed additional school-related journeys in this broad location. Development in this part of the District will inevitably have an impact on the existing highway network. The Infrastructure Delivery Plan includes a range of measures to mitigate these impacts. Measures include: improvements to sustainable transport modes such as cycling, walking and buses; dual carriageway and junction improvements for Europa Way to provide efficient access to the M40; improvements to junctions at Banbury Road; improvement to the traffic system in Warwick Town Centre; improvements to the network in a range of other locations across the towns including Myton Road and Emscote Road. The strategy of focusing a significant number of dwellings in this area enables improvements to the Europa Way corridor, thereby providing an alternative route from the south of the towns to the M40 and A46 without putting further pressure on the town centres. This is a significant concern of residents that has been raised in representations relating to this site, particularly as there is a view that development here will impact on areas that are already congested.
 - ii. **Heritage:** The site does not have a direct impact on any heritage assets. However the impact of the transport mitigation proposals on sensitive heritage assets in and around Warwick Town Centre has been considered. This concern has been raised by Historic England (and other representations). However, the District Council has been working closely with Warwickshire County Council to develop mitigation proposals that take account of heritage assets and where possible improve their setting. As a result, Historic England has now indicated that they are satisfied that appropriate mitigation can be achieved.
 - iii. **Landscape:** Concerns have been raised about the loss of green fields close to the towns and the loss of the area of restraint as identified in the current Local Plan. The site does have some landscape value and was identified as an area of restraint in the extant Local Plan. However, the area of restraint policy is now out of date and the

landscape evidence indicates that the quality of the landscape should not prevent development here. These issues were considered in approving the application referred to in 1) above.

- iv. **Air quality:** The air quality assessments (A01 and A04PM) shows that over the plan period, air quality is expected to improve due to cleaner vehicle technology. Although this is an issue that has been raised in a number of representations, the evidence suggests that the situation will improve.
- v. **Loss of agricultural land:** Representations have raised this as a concern. This issue was considered as part of the approval of the planning application referred to in 1) above.
- vi. **Ecological impacts / hedgerows / trees:** Representations have raised this as a concern. This issue was considered as part of the approval of the planning application referred to in 1) above.
- vii. **Focus of development in to congested south of District and Car dependency:** Representations have raised this as a concern. Whilst there is a significant focus of development to the south of Warwick, the evidence suggests that with mitigation, the infrastructure can accommodate this level of growth (IN07PM, TA5 and TA9). The location of a new school within the area of housing expansion seeks to minimise travel distances, thereby encouraging the use of sustainable modes of transport.

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

- a) The site has good access to the existing highways network and is located close to existing public transport links and other sustainable transport facilities. The Strategic Transport Assessments (TA14PM) have taken account of the need for additional education-related journeys in this area and the proposed package of mitigation set out in Appendix B of TA14 will accommodate this proposal. Specifically the transport mitigation includes:
 - Improvements to Europa Way
 - Improvements to Myton Road junctions
 - Improvements to Banbury Road and Gallows Hill
 - Improvements to the cycling and walking network across the housing development and linking to the new school
 - A new park and ride
 - Extended and improved bus services
- b) Specifically, the site lies at the heart of the propose cycle and pedestrian network for this area as set out in the appendices of the Infrastructure Delivery Plan. This network has been designed to take account of the allocation of this land for education.
- c) There are no significant infrastructure costs or other constraints associated with the site. However, the planning of the new school will need to take account of its close proximity to Myton School. As a result its development will need to ensure the schools frontages are accessible from different parts of the area. Myton School is currently accessible from the Myton Road and attracts from existing housing. Any new school would need to face towards Heathcote Lane and Gallows Hill to enable access from the Strategic Urban Extension.

4) How does the proposed allocation relate to proposed housing sites in terms of phasing, funding etc.?

- a) The County Council are proposing a three phase approach to meeting the education requirements of development across this area:
- Phase 1 (up to September 2018) involves filling existing school places
 - Phase 2 (2018 to 2022) involves expanding Champion School and over time, filling the resulting capacity
 - Phase 3 (2022 onwards) involves new school provision at Europa Way.
- b) Based on the Housing Trajectory, the County Council have given careful consideration to the timing of the requirement for new capacity. The approach currently being planned is based on the following:
- Existing pupil forecasts show that there is spare capacity within the Warwick and Leamington Planning Area. It is proposed to fill existing spare capacity before adding provision elsewhere.
 - The forecasts assume pupil numbers will be generated by the new housing immediately. There has been no discount for families moving within the area, or for children staying at their existing school, so the figures reflect something of a worst case scenario.
 - Forecasts have also assumed the children will be evenly spaced across all year groups.
 - Taking a worst case scenario for pupil generation there will be a need to add additional capacity in Year 7 from September 2018. The County Council proposes for 2 additional forms of entry to be made available at Champion School with effect from September 2018. This will be added at Year 7 with numbers then growing across the school year on year.
 - Growth across Years 8 to 13 can be accommodated within the existing provision for longer, as the cohort size across the higher age groups is lower than the total of the existing places available.
 - After the initial expansion at Champion School, additional provision would be required from approximately 2022. Again this will be from Year 7 with spaces then growing year on year.
- c) However, until the Local Plan is adopted and current planning applications are determined, there is some uncertainty about total growth. This means that approach outlined above may be reviewed and so exact timings and costing is fluid.
- d) Funding of the first expansion phase, i.e. the expansion of Champion School will be met from approved Section 106 developer contributions. Section 106 agreements that have already been secured to contribute to the overall strategy. Although trigger points mean that the receipt of the S106 income can take some time, the phased delivery of the proposal means that substantial funding will be available to deliver the project. The phased approach also ensures that pooling restrictions can be avoided by ensuring the contributions are made to specific infrastructure projects within the overall strategy and enables the County Council to guard against over-provision.
- e) A new school would probably be part of Central Governments' 'Free School Programme', although for the reasons outlined above, this won't be considered until the Local Plan has been adopted and the County Council has a clearer picture about total growth.

5) Is the proposal realistically viable and deliverable? How will it be funded?

- a) As set out above, the Councils are confident that the proposals are viable and can be funded. The land is already set aside for the proposals and the timing of Section 106 contributions

enables phase 1 and phase 2 to be achieved. Phase 3 (a new school) will also benefit from Section 106 contributions from developments completed after 2018. However, it is likely that some additional funding will be required. The Central Government 'Free School Programme' (or any successor of this programme) is likely to offer an additional potential source of funding. Detailed planning for this will begin once the Local Plan is adopted and there is clarity and certainty regarding the pupil numbers that will need to be accommodated.

6) What is the expected timescale for development?

- a) See answer to question 4) above

ED2 – Southcrest Farm, Kenilworth

1) What is the justification for the proposed allocation? What options were considered and why was this site chosen?

- a) The National Planning Policy Framework states as paragraph 72:
- i. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*
- give great weight to the need to create, expand or alter schools; and*
 - work with schools promoters to identify and resolve key planning issues before applications are submitted.*
- b) It is in this context that the Council has worked with Kenilworth School and Warwickshire County Council to address the educational needs of Kenilworth and support the relocation and expansion of Kenilworth School, which is recognised as an "Outstanding" school.
- c) The proposed housing allocations in the Kenilworth priority area will result in a requirement for an additional 395 secondary school places and 78 sixth form places (see Appendix 2 prepared by WCC). Combined with existing need within the Kenilworth School priority area, 2200 secondary and sixth form places are required to support the town.
- d) Kenilworth school currently has approximately 1744 students and operates over two sites; neither are suitable for expansion on the scale proposed (this is recognised in the representations by WCC to the Proposed Modifications – rep no.12790). Furthermore the split site arrangement cannot be sustained by the school for financial and operational reasons. Hence, it is both desirable and necessary for the school to be located to a single site. The amount of land required is estimated to be between 32 & 35 acres (13 – 14ha).
- e) The Local Plan Publication Draft identified Land at Southcrest Farm as Major Education Allocation (ED2) for the relocation and expansion of Kenilworth School. The Publication Draft also identified the school's existing sites as housing allocation amounting to 380 dwellings.

- f) The allocation of land at Southcrest Farm addresses the need for the school to serve the existing population, in close proximity to the existing Leyes Lane site. It is readily accessible to the existing highway network and public transport routes. Furthermore, given that there is not the ability to provide expansion on the school's existing sites, development of school on readily available accessible site will mean it can be delivered early in the plan period.
- g) The Council, Kenilworth School and Warwickshire County Council have considered alternative options to deliver the projected educational needs:
- i. It was established that whilst the level growth in secondary pupil numbers was significant it is not sufficient to warrant a school on its own. Further, the provision of sufficient school places to children within the town, was deemed most appropriate from an accessibility and sustainability objective. Therefore the expansion of Kenilworth School was deemed the preferred approach.
 - ii. In reality there are limited reasonable alternative options for the relocation and expansion of the school onto a single 35 acre site within or on the edge of the town. There are no brownfield or urban sites that can accommodate the school. Kenilworth School examined the potential for development to the west of the town, however due to environmental and highway constraints there were no reasonable options.
 - iii. To the east of Kenilworth, land has been deemed suitable and allocated for the provision of housing and associated uses and it is in this area that has the most potential for education provision. However, due to site size limitations at Thickthorn, and the desirability for housing here, this limits options to Southcrest Farm and Crewe Gardens. Clearly the Publication Draft identified Southcrest Farm for education purposes, as the most suitable option. Initial designs by Kenilworth School indicate that buildings located furthest away from the A46 are the most appropriate to mitigate noise impacts and meet noise standards for school buildings without the need for significant glazing and mechanical ventilation.
 - iv. During the preparation of the proposed modifications consideration was given to the position of the school relative to the proposed allocation of H40. However, it was considered that due to the topography and the noise emanating from the A46 that Southcrest Farm was still the most appropriate option. This is in addition to the positive benefits outlined above of being in close proximity to the existing secondary school and residential area as well as its ability to be delivered early.
- h) Representations by Gleeson to the Proposed Modification suggest that the school should be subsumed into the wider Land East of Kenilworth housing allocations (H06 & H40) with the precise location to be determined through masterplanning. However, for the reasons set above and to provide certainty to the delivery of both housing allocations and the school, the Council do not consider this to be appropriate.

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

- a) **Loss of agricultural land:** The development of the school here will result in the loss of some grade 3a agricultural land. However, the Council contends that the public benefits of housing in this location out-weigh the loss of agricultural land. Representations have indicated concern about the loss of farmland.
- b) **Noise:** As outlined above, noise studies undertaken by the school's advisors have indicated noise to be a constraint in the design and therefore the location of buildings is concentrated to the north of the site.
- c) **Transport and Traffic:** The Highway Authority supports a combined secondary school here. It has the potential to be made highly accessible by means other than the private car.
- d) **Topography** The site slopes down from north to south and dependent on the final layout of playing fields and the school, it may mean some regrading is necessary

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

- a) The site has good access to the existing highways network and is located close to existing public transport links. The school has undertaken assessments of the site and taken into account the costs of servicing and assembling the land in the build costs. Overall, aside from noise constraints outlined above, nothing has been identified as an abnormal build cost and there is nothing that would hinder the delivery of the scheme.

4) How does the proposed allocation relate to proposed housing sites in terms of phasing, funding etc.?

- a) As outlined above the existing secondary school site is at capacity and delivery of the school is required early in the plan to ensure capacity of development within the priority area. Both of the school's existing sites have been allocated for housing, to be delivered later in the plan period, once the new school site is developed. However, it is possible that a phased approach to building the new school could occur whereby the sixth form relocated first.
- b) It is anticipated that the school would open in September 2020.
- c) All housing allocations will be expected to contribute a proportionate amount towards the delivery of the school in accordance with the CIL Reg. 122 tests. However, the total receipts for education purposes may not be realised until later in the plan period, therefore an amount of forwarded funding would be needed to address this.

5) Is the proposal realistically viable and deliverable? How will it be funded?

- a) Potential sources of funding for the school are as follows:
- Sale of land occupied by the existing school for housing
 - CIL/Section 106 contributions

- Department for Education / EFA funding
- Other sources relating to the potential for providing specific facilities on the site

- b) The exact quantum of funding from each source is still to be finalised. However, the financial planning undertaken to support the proposals for the redevelopment of the school indicates that there is a reasonable prospect that a balance between income and costs can be achieved.
- c) However, in order to deliver the school in advance of the disposal of existing sites, some forward funding will be required. The precise level of forward funding required to deliver the school has yet to be identified, but is likely to be in the region of £10m. All parties have agreed to work together on an ongoing basis to address the quantum necessary and its source(s). The school have confirmed that a development partner would likely be sought to deliver the school and the existing school sites. Based on this and a phased approach to the delivery of the school. Options to address the initial cashflow include one of three key parties borrowing at prudential rates or approaching the DfE/EFA to pursue funding options. The allocation of the site will provide further certainty to support this.

6) What is the expected timescale for development?

- a) The expected timescale for opening of the school is September 2020. This is based on an application being submitted by the end of 2017, with construction commencing in the summer of 2018 and completing summer 2020.

In addition to the above, for ED2 at Southcrest Farm, Kenilworth

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

- a) The site is within Green Belt parcel KE1 which has been assessed as playing a role in preventing ribbon development and maintaining openness (checking unrestricted sprawl); and a role in preventing settlements merging into one another.
- b) The parcel is generally devoid of urbanising influences but the significance of the A46 boundary and the Finham Brook means that the parcel overall plays a limited role in safeguarding the countryside from encroachment.
- c) Overall this parcel is one that performs less well against Green Belt purposes compared to others adjoining Kenilworth.
- d) Finally (like all parcels) a strategic role in assisting regeneration (see LA07PM).

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

- a) The Green Belt is generally open and development here would harm the openness of the Green Belt.
- b) It is proposed to remove this site from the Green Belt in line with paragraph 85 of the NPPF. This proposal
- i) Ensures consistency with the Local Plan strategy
 - ii) Removes this parcel which is not essential to keep permanently open

iii) Uses physical features (a hedge-line / tree belt) to provide a strong Green Belt boundary and which can be further enhanced.

- c) The **residual Green Belt** will continue to meet the essential characteristics set out in paragraph 79 of the NPPF. The development will not lead to **further countryside encroachment**, or the potential for settlement coalescence as it is contained by the A46 to the east and Crew Lane to the north (LA05 & LA09PM). The Landscape Value Assessment for the Joint Green Belt Study 2009 (Appendix 11, LA05) states:
‘Existing mature vegetation would allow this area to be visually contained whilst sensitive design could extend this enclosure’.

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

- a) **Exceptional circumstances** for the allocation of ED2 and alteration to Green Belt in Kenilworth are identified as follows:
- i) Is there an essential need that has to be met? Yes, as outlined above, Kenilworth School is currently at capacity and does not have the ability to meet the identified needs of additional pupils as a consequence of additional housing growth. It is essential the additional school places are provided
 - ii) Are there any suitable sites outside the Green Belt that can meet this need? There are no sites outside the Green Belt or more sustainable locations within the Green Belt that can meet the educational needs of Kenilworth.
 - iii) Is this the best site within the Green Belt to meet the need? As outlined above, given that the limited suitability of sites in the Green Belt around Kenilworth, due to highways, heritage, and environmental constraints, Southcrest Farm represents the most appropriate location for the provision of an expanded Kenilworth secondary school. Locations beyond those Green Belt parcels that are directly adjacent to the Town are not considered to be appropriate to meet the identified needs as they do not offer safe and sustainable means of transport from the Town.

Appendix 1

Permitted Housing - Campion and Myton School Priority Areas

Application No.	Location	No. dwellings	Local Plan Status
14/1076	Land between Myton Road and Europa Way	735	LP allocation
14/0967	North of Gallows Hill	425	LP allocation
13/0607	North of Harbury Lane	220	LP allocation
13/0464	N/A continued care provision		
14/0661	Lower Heathcote Farm	785	LP allocation
14/0023	Harbury Gardens	200	LP allocation
15/0851	Harbury Gardens	520	LP allocation
13/1207	Woodside Farm	280	LP allocation
16/0279	Seven Acre Close, Bishops Tachbrook	50	LP allocation
14/0689	North of Oakley Wood Rd, Bishops Tachbrook	150	Not LP allocation
13/0858	Fieldgate Lane	94	LP allocation
12/0027	South of St Fremund Way	209	LP allocation
14/0433	Spring Lane, Radford Semele	65	Not LP allocation
14/0322	North of Southam Road, Radford Semele	60	LP allocation
16/0196	South of Offchurch Lane, Radford Semele	150	Not LP allocation
15/1761	West of Southam Road, Radford Semele	25	Not LP allocation
15/1361	St Mary's Road/Sydenham Drive	143	LP allocation
15/1448	N/A student accommodation		
15/0905	Station Approach	212	LP allocation
14/0681	South of Gallows Hill / West Europa Way	450	Not LP allocation
14/0300	The Asps	900	Not LP allocation
		5673	

Figure approved greater than original allocation

Figure approved greater than original allocation

Kenilworth School

Priority Area of Residence of Kenilworth School Pupils – October 2015

Priority Area	Year Group						Total
	7	8	9	10	11	12 & 13	
Kenilworth School Priority	243	220	202	203	223	267	1358
Warwickshire Other Priority	11	26	15	25	11	68	156
Out of County	19	47	35	37	26	66	230
Total	273	293	252	265	260	401	1744

**Approximately 25 pupils per year group 7-11 attend another Warwickshire school whilst residing in the Kenilworth priority area. The majority of these children attend Grammar Schools at Stratford upon Avon or one of the Catholic Schools in the wider area.*

Historically, a relatively small proportion of the school population has resided outside the Kenilworth priority area – between 11% and 25% in year groups 7 to 11. Initial 2016 figures would suggest none or very few pupils living outside the priority will be offered a place for Year 7 September 2016 with the year group filling from the Kenilworth area. This pattern is expected to continue as similar fluctuating larger primary cohorts move into secondary.

Current Forecasts for Kenilworth School (excluding Local Plan housing with the exception of H07)

School	Year	NCA	PAN	Yr 07	Yr 08	Yr 09	Yr 10	Yr 11	Yr 12	Yr 13	Total
Kenilworth School and Sports College	Sep-16	1800	270	274	275	298	256	266	222	166	1756
	Sep-17	1800	270	271	277	283	300	257	227	185	1801
	Sep-18	1800	270	288	274	285	285	301	222	191	1845
	Sep-19	1800	270	271	291	282	287	286	250	185	1851
	Sep-20	1800	270	287	274	299	283	287	240	214	1883
	Sep-21	1800	270	277	289	281	300	283	240	204	1872
	Sep-22	1800	270	270	279	296	282	300	237	203	1866

Impact of Housing

Warwick Local Plan Sites January 2016 in Kenilworth Priority area

Ref	Site	Dwellings	Pupils 11-16	Pupils 16+
H09	Kenilworth School Site	250	45	9
H12	Kenilworth 6th Form	130	24	5
H06	East of Kenilworth (thickthorn)	760	138	27
H07	Crackley Triangle (included)	90	N/A	N/A
H40	East of Kenilworth (South Crest)	640	116	23
H41	East of Warwick Rd, Kenilworth	100	18	4
H37	Leek Wootton - Car park East of The Hayes	5	1	
	Leek Wootton - Former Policy HQ	115	21	4
H24	Burton Green - Burrow Hill Nursery	90	16	3
	Total	2180	379	75
H08	Oaklea Farm, Finham	20	4	1
H42	Westwood Heath	425	77	15
H43	Kings Hill Lane (1)	1800	327	64
H43	Kings Hill Lane (2)	2200	400	78
H19	Baginton - Land north of Rosswood Farm	80	15	3
	Total	4525	823	161
	Grand total	6705	1202	239 236

There are a total of 4505 new homes identified within the Kenilworth priority area to be built within the plan period. This figure allows for the delivery of 1800 homes at Kings Hill with the remaining 2200 coming forward after the life of this plan. However, when considering the delivery of new schools we need to look at the total projected growth to consider the longer term impact.

There are $1218 + 239 = 1457$ pupils of whom $395 + 78 = 473$ would be within the Kenilworth priority area (assuming a new school at Kings Hill). Kenilworth school cannot accommodate an additional 473 pupils without the space to expand – this requires relocation. A second new school would be required for $823 + 161 = 984$ pupils at Kings hill.

Ultimately this two school split will be dependent on the timing of the developments and delivery of the second school. If the sites on the outskirts of Coventry came forward before the Kings Hill development further demand would be placed on Kenilworth School.