

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE ON 27 FEBRUARY 2019

PART A : REPORT

SUBJECT: SECONDARY SCHOOL TO SUPPORT THE LOCAL PLAN STRATEGIC ALLOCATIONS

REPORT AUTHOR: Donna Moles, Senior Planning Officer
DATE: 29 January 2019
EXTN: 37697
PORTFOLIO AREA: Planning

EXECUTIVE SUMMARY:

This report seeks approval for the Council to adopt the recommendation for a preferred option/site for location of a 10 Form of Entry Secondary School in the area of search based around the central part of the Arun District as per Policy INF SP2 New Secondary School in the adopted Arun Local Plan 2018.

RECOMMENDATION:

That the Planning Policy Sub-Committee:-

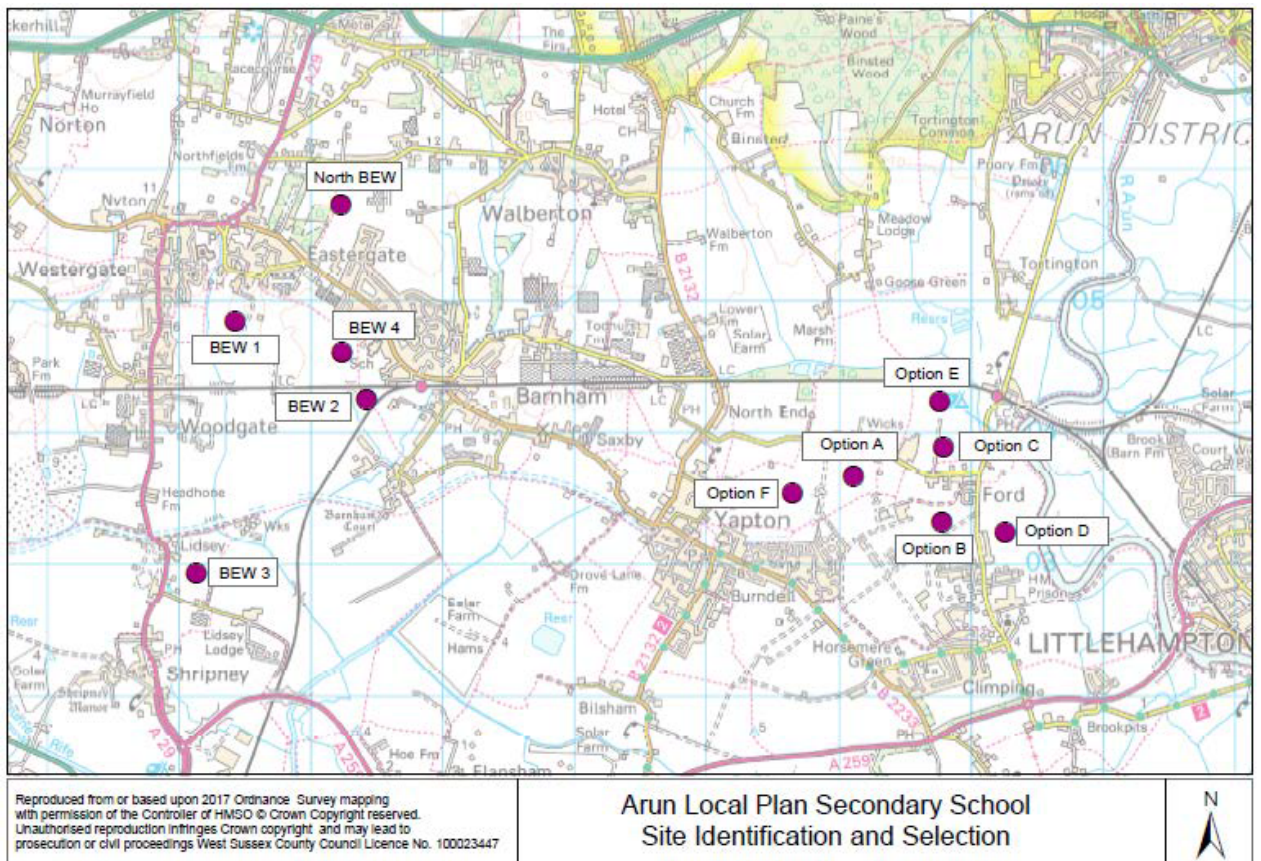
1. Supports the identification of Option/Site F as the preferred option for location of a 10 Form Entry Secondary School to support the Local Plan Strategic allocations. If this Option becomes undeliverable then it is recommended that the Council explore appropriate mechanisms to secure delivery of a 10 Form Entry Secondary School at either Site F or Site L and provide an appropriate report for consideration to this committee.

1 BACKGROUND

- 1.1 Arun District Council (ADC) adopted The Arun Local Plan on 18th July 2018. <https://www.arun.gov.uk/adopted-local-plan> and as part of the Plan, Policy INF SP2 sets out the requirement for a new 6 form entry secondary school with expansion land for a 4 form entry expansion adjacent on a site of at least 10 hectares to serve the expected new growth from the strategic allocations.
- 1.2 West Sussex County Council (WSCC) previously published a separate document explaining why a new secondary school is needed, as evidence to support the Arun Local Plan. This document sets out the identification and selection of potential sites and is intended to build on, rather than replace, the earlier document called; "Secondary Education in Arun District in Document reference SEDP3d" (See

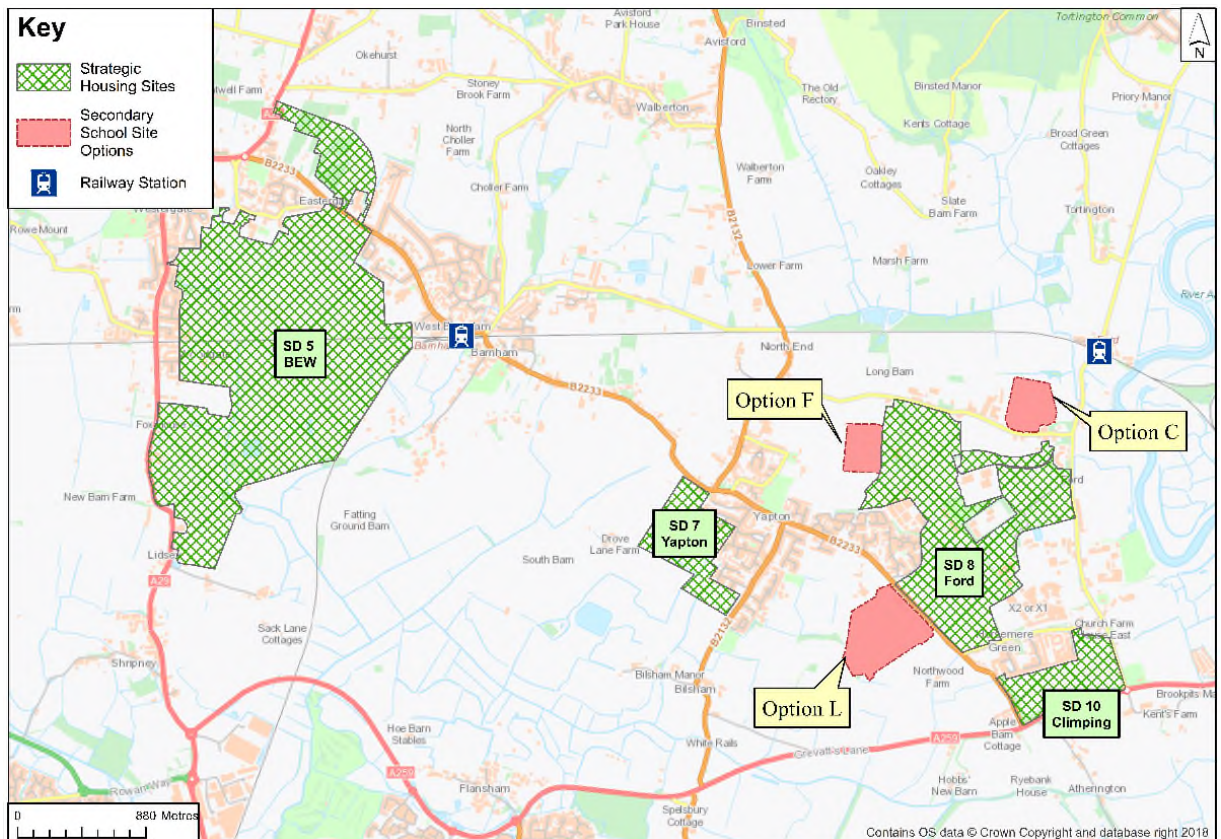
Background paper 3 SEDP3d Update to School provision in Arun District). As such Arun District Council is required to allocate a suitable and deliverable site for a 10 form entry Secondary School.

- 1.3 As the need for a new secondary school is closely related to the need arising at the location of new development, the focus in identifying potential sites has been initially to work with the strategic site promoters to identify land which could become available for use as a secondary school. The largest strategic site allocations are at Barnham, Eastergate, Westergate (BEW) Climping and Ford, where large numbers of secondary school pupils will be expected to be living in the future.
- 1.4 The BEW and Ford strategic site promoters subsequently identified eleven sites on land within their control that could potentially be utilised for a new secondary school. A desk top site assessment was done by WSCC and ADC (independent of each other) for the 11 sites brought forward by the site promoters (See **Map 1** below). This document concluded that the site assessment by WSCC and ADC officers identified two sites (options C and F) that are potentially suitable and could be available for use as a secondary school during the plan period, subject to all necessary feasibility, design, consultation and statutory processes. It also concluded that other sites could also potentially be suitable but are likely to require more detailed assessment and design of mitigation measures.



Map 1: Potential sites for secondary school

- 1.5 As such, one further site option L was identified by ADC officers and a desk top site assessment using the same criteria was done (June 2018). The location of option L with regard to the strategic allocations also made it potentially suitable along with options C and F.
- 1.6 The next step was to further assess these three shortlisted sites (See **Map 2** below). ADC subsequently commissioned Systra to undertake a study to further assess those three shortlisted sites and to make a recommendation on the preferred location/site for the secondary school. This recommendation would then be used to inform the final selection of a suitable and deliverable site for the new 10 form entry Secondary School for Arun.



Map 2: The three shortlisted sites

The Secondary School Site selection Study

- 1.7 The brief established a set of criteria to identify the key issues that could make a site suitable/unsuitable and also to reduce delivery risks to the education provider. This would assist officers from ADC and WSCC in discussions with site promoters and stakeholders, to select the most suitable and deliverable site for the secondary school.
- 1.8 The aim of the study was to identify a secondary school site which is accessible, safe and maximises sustainable transport options in the central area of the District, without having severe impact on the highway network while also providing a safe journey to and from the school.

- 1.9 The study explored the different accessibility scenarios for each option alongside the key site constraints. These scenarios also set out the mitigation required in order to maximise safe sustainable transport options to the new Secondary School from Barnham, Eastergate, Westergate (BEW) Climping, Yapton and Ford Strategic Allocations including to the existing main settlements in the central area of the District, without having severe impact on the highway network. This would meet the County Council's requirements and the terms of the Arun Local Plan Policy INF SP2.
- 1.10 The Study (**See Background papers 1 and 2**) recommended that: *"...considering the accessibility of the sites and the constraints identified it is considered that Option L is the most favourable site for a secondary school, arguably followed by Option F with Option C the least favourable."* It also concluded that: *"..overall it is evident that all the sites provide an opportunity for a secondary school with Option L chosen as it provides greatest certainty by not being reliant on nearby schemes and having the fewest risks."*
- 1.11 Whilst the study and its recommendation of Option/Site L is supported, it is vital to note that the study is clear that there are various mitigation issues required with each of the sites/options that could make each of them suitable. A key consideration is railway infrastructure and proximity to Ford Railway station. Whilst this is a positive opportunity in many regards, there is however, a concern around the capacity of the station to accommodate the likely numbers of pupils. Station capacity and safety considerations at both Ford and Barnham train stations have been highlighted to Network Rail and their advice was sought on those concerns and the potential mitigation measures which would be needed.
- 1.12 Network Rail identified capacity and safety issues for both the Ford and Yapton level crossings with a need for a foot bridge at Ford station. They also highlighted capacity issues on the train coaches themselves and the platforms, as it was felt it would most probably not be viable to add an extra coach for one stop. They suggested that in tandem with using rail travel, cycling should be highly promoted as a sustainable mode of transportation.
- 1.13 The Site Study has identified various improvements that would be required to serve a secondary school in each location and whilst the study recommended Option/Site L as the preferred site for the school, it is an evidence document which has to be weighed up with other considerations to inform the decision on a site.
- 1.14 Therefore, as part of assessing updates on the status of each site, ADC consulted the following landowners/stakeholders to get their views on the sites and to rank the three sites in order of their preference with commentary on reasons for the conclusions:
- Barnham Parish Council
 - Eastergate Parish Council
 - Ford Parish Council
 - Climping Parish Council
 - Yapton Parish Council
 - Site promoter for Sites C and F

- Landowner of Site L
- WSCC- Education
- WSCC – Highways and Transport
- Network Rail

- 1.15 The responses received on the ranking of the possible sites are tabled in **APPENDIX 1** at the end of this report. The rankings were mixed and the reasons for ranking sites were quite varied. All of the responses were reviewed and considered.
- 1.16 Deliverability of a site is a key component in progressing a project. It is therefore, important to note that the owner of Option/Site L has confirmed on several occasions that they do not wish for their site to be considered for a secondary school. This has significant implications for the site, as it would require a Compulsory Purchase Order (CPO) in order for The Council to acquire Option/Site L.
- 1.17 The law and procedure relating to compulsory purchase is complex and whilst a CPO can be used to acquire land for strategic projects, it should be a last resort. In this scenario, it is vital to note that The Study is clear that there are various mitigation issues with all the sites and as such all of them can be made suitable. Therefore, it may not be in the public's interest for the Council to pursue Option/Site L whilst Option/Site F is an available, suitable and deliverable option.
- 1.18 In terms of preference overall, when you compare the comments in the summary for each site there is little to choose between F and L. The recommendation is therefore to progress the allocation of Option/Site F for the Secondary School and to begin addressing the key mitigation measures identified in the study. Option/Site L would remain as a reasonable alternative should its availability change.

NEXT STEPS

- 1.19 Should the Council agree that Option/Site F is to be allocated as the Secondary School site, the formal legal process will commence. It is important to note that at this stage, the site is only being allocated and will still be subject to all necessary feasibility, design, consultation, planning and statutory processes. A subsequent planning application will need to be made either by the developer of the secondary school or West Sussex County Council.
- 1.20 The new school shall be delivered through a legal agreement which sets out how and when the facility will be delivered to meet the education requirements of the WSCC as the Local Education Authority (Policy INF SP2 – bullet point d). This legal process will need to be progressed in consultation with WSCC.
- 1.21 Officers will begin addressing the key mitigation measures identified in the study in order to progress the allocation. Linkages between the strategic allocations and Site F should be included in the masterplanning of the strategic sites to ensure safe cycleways and footpaths are provided. Where linkages exist along Bonhams Farm and the Old Canal area, these will need upgrading and extending to provide a complete and consistent cycle link route. These pedestrian and cycling enhancements will need to be co-ordinated through Development Management decisions to secure their delivery.

1.22 Officers will bring this item back to Planning Policy Sub Committee at appropriate stages throughout the process.

2. PROPOSAL(S):

In order to ensure that there is the required level of secondary school provision in Arun, the recommendation is that Option/Site F is allocated as the site to provide a new secondary school in accordance with Policy INF SP2 and any other relevant policies of the Development Plan. However, should option F become undeliverable, then it is recommended that the Council explore appropriate mechanisms to secure delivery of a 10 Form Entry Secondary School at either Site F or Site L.

3. OPTIONS:

The other option is to not progress and allocate a site for the secondary school. This would risk going against the Local Plan and cause the Council to be in a position where there would be unplanned development (i.e. Strategic Allocations not supported by necessary infrastructure such as provision for school places) and risk failing to deliver the Local Plan.

4. CONSULTATION:

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council	x	
Relevant District Ward Councillors		x
Other groups/persons (please specify)		
5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)	YES	NO
Financial		x
Legal		x
Human Rights/Equality Impact Assessment		x
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability		x
Asset Management/Property/Land		x
Technology		x
Other (please explain)		x

6. IMPLICATIONS:

Possibly a modest impact on the delivery of the housing trajectory timetable.

7. REASON FOR THE DECISION:

The decision is intended to ensure that Arun can allocate a site for the Secondary School

and continue to secure development that is plan led and consistent with sustainable development and with the aims and intentions of the recently adopted Local Plan.

9. BACKGROUND PAPERS:

- **Background paper 1** SEDP8 Secondary School Site Selection Study- SITE STUDY (dated 05/12/2018) <https://www.arun.gov.uk/local-plan-secondary-evidence>
- **Background paper 2** SEDP9 Secondary School Site Selection Study- SITE SELECTION STUDY – NON TECHNICAL SUMMARY (dated 05/12/2018) <https://www.arun.gov.uk/local-plan-secondary-evidence>
- **Background paper 3** SEDP3d Update to School provision in Arun District (ADC Local Plan Examination Library) <https://www.arun.gov.uk/local-plan-secondary-evidence>
- **Background paper 4** SEDP3c Appendix 2 Strategic Housing Secondary Education Requirements (ADC Local Plan Examination Library) <https://www.arun.gov.uk/local-plan-secondary-evidence>

APPENDIX 1:

The responses received on the ranking of the possible sites are tabled below:

Consultee	Responded	Summary of Comments received	Site Ranking																												
Barnham PC	yes	<ul style="list-style-type: none"> • Support, with qualifications, to site L • That a bus shuttle service is added to facilitate use of Ford and Barnham Railway Stations • That traffic calming and safety options are researched for upgrading the Yapton Road between the Barnham railway bridge and the new school site • That the old canal is upgraded to provide a traffic free route from the BEW Strategic Development (SD5) to the new school. 	1. Site L																												
Eastergate PC	yes	<p>My councillors agree with the consultants in naming Site L as the appropriate first choice, subject to the following qualifications. However, considerable concern is expressed as to the safety/risks relating to the use of Yapton Road for cycling to the proposed school.</p> <ul style="list-style-type: none"> • That a bus shuttle service is added to facilitate use of Ford and Barnham Railway Stations • That traffic calming and safety options are researched for upgrading the Yapton Road between the Barnham railway bridge and the new school site • That the old canal is upgraded to provide a traffic free route from the BEW Strategic Development (SD5) to the new school. <p>I anticipate that the council will address the matter of the other two sites, and their preference, when the matter is considered at the next PC meeting on the 7th February.</p>	1. Site L																												
Ford PC	yes	<p>Each eligible Councillor voted for their choice as describe in the consultation document as follows:- 3 points first choice 2 points second choice 1 point last choice.</p> <p>We were asked to vote on the sites not on the quality of the information in the report.</p> <p>Results for school site votes:-</p> <table border="1"> <thead> <tr> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>L</td> <td>3</td> <td>1</td> <td>3</td> <td>3</td> <td>3</td> <td>13</td> </tr> <tr> <td>F</td> <td>2</td> <td>2</td> <td>2</td> <td>2</td> <td>2</td> <td>10</td> </tr> <tr> <td>C</td> <td>1</td> <td>3</td> <td>1</td> <td>1</td> <td>1</td> <td>7</td> </tr> </tbody> </table> <p>Please note that the NDG did not vote for the site in Ford and it is not in the Neighbourhood Development Plan so the Council reserve the right to object to the development at a later stage of planning.</p>							Total	L	3	1	3	3	3	13	F	2	2	2	2	2	10	C	1	3	1	1	1	7	1. Site L 2. Site F 3. Site C
						Total																									
L	3	1	3	3	3	13																									
F	2	2	2	2	2	10																									
C	1	3	1	1	1	7																									
Climping PC	yes	<p>First Preference: Option C (close by Ford Railway Station) is our</p>	1. Site C 2. Site F																												

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		<p>first preference:</p> <p>It is the only option with meaningful public transport (rail from Barnham or Littlehampton – there is a 1000 home strategic site proposed on the west bank of the Arun). Our view is that options F and L will both have significant adverse highways impacts given the dearth of meaningful bus routes, pedestrian walk ways and cycle paths in the area, as the study notes.</p> <p>The need for a route to bridge the railway should not limit the option as other bridge routes closer to Ford railway station should be available. The route shown in the Local Plan is purely notional and completely unfunded.</p> <p>Second Preference: Option F (adjacent to Yapton and the Ford development) is our second preference as it is well placed to serve Yapton and Ford directly. Suitable road and footpath infrastructure will be needed within strategic site SD8 in all eventualities. It also has the advantage of limiting the number of journeys traversing Yapton completely on the Yapton road that would be needed in Option L.</p> <p>Third Option is considered completely unsuitable: Option L site in Clymping is completely unsuitable given the mix of industrial activities, associated HGV movements and rifle ranges. The noise, dust and traffic generated by the recently approved cement works are not compatible with a school environment. Expansions to the waste handling are also in train at the site (WSCC/002/19/CM). Traffic movements on the Yapton Road at the proposed location and to south are already a matter of high concern locally. There are no guarantees that meaningful improvements to the Oystercatcher junction will be delivered and the Yapton Road from A259 to the Option L site is completely unsuitable for pedestrians and cyclists.</p> <p>Missing Option Given that the study anticipates 60% of pupils will come from Barham /Eastergate /Westergate we are confused why an option is not being considered adjacent to the B2233 between Barnham and Yapton.</p>	<p>3. Site L</p>
Yapton PC	yes	<p>YPC are strongly of the view that the proposed new secondary school should be to predominantly support the growing need of the Six Villages to the West of the River Arun. YPC key criteria in assessing the most suitable location for a new secondary school are:</p> <ol style="list-style-type: none"> 1. Proximity to new Strategic Housing Sites 	<p>1. Site L</p>

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		<p>2. Good sustainable transport links for all future students in the Six Village area eg bus, cycle ways and walking.</p> <p>3. A site that is not dependent upon additional new infrastructure thus ensuring quick deliverability when required.</p> <p>Based on the above key criteria and assessing alongside Systra’s recommendations set out in Table 12 School Sites Comparison dated 05/12/2018 YPC strongly support option L.</p> <p>YPC strongly oppose Option C based on its high flood risk which places a question upon its future sustainability credentials. YPC also view this as a site biased towards students with good access to trains which would exclude all children in the Ford, Clymping and Yapton areas thus only favouring Barnham students where there is already access to two existing secondary schools.</p> <p>YPC are also opposed to option F. Option F is less accessible to children from both Clymping and Barnham and is a 20 minute walk from SD7 compared to Option L which is accessible by bus from SD7.</p> <p>Option F would also significantly reduce the potential to provide a visual separation between Ford and Yapton and therefore be contrary to the ALP’s Policy HSP2c (SD8).</p> <p>YPC therefore support Option L only.</p>	
Site promoter for Sites C and F	yes	<p>While both sites (Options C and F) are currently ‘available’, our strong preference would be for the secondary school to be delivered at Option F. This is because Option C would not place the secondary school in the most sustainable location, would compromise the wider masterplan and is therefore not available for use as a secondary school.</p> <p>In terms of the planning status of sites C and F, both sites fall outside of the Neighbourhood Plan and Local Plan allocation. While site F forms part of a Local Gap policy in the emerging Neighbourhoods Plan, the policy notes that <i>“Within this area development will not be permitted unless it does not prejudice the openness of the local gap.”</i> Therefore, providing openness is retained, development is not considered unacceptable, as confirmed by the Examiner’s Report.</p> <p>Both sites are in agricultural use, while there are some barns in the bottom south east of the drawn area for site C, which are in B2 and B8 use.</p>	<ol style="list-style-type: none"> 1. Site F 2. Site C
Landowner of Site L	yes	<p>In reply to your letter dated 10th Dec, I can confirm that I do not wish my site to be considered for a secondary school.</p>	

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		<p>The map that you have included this time shows a much larger area of land than the original 10ha and includes land in a Trust which, although I am a Trustee, I do not own. It is already developed and in 30year leases so would not in any case be deliverable.</p> <p>My objection is that by taking this land you would fundamentally jeopardise my farm business. This time you have included my main farm entrance, workshop, grain store and working areas which would, in effect, wipe out my farm.</p> <p>You have also failed to take into account in your assessment, the TJ Recycling Centre, the Rifle Range and the Concrete Batching Plant due to be built in February.</p> <p>This land is simply not deliverable and should not be considered.</p>	
WSSC- Education	yes	<p>Feel strongly that the decision over which of the sites should be allocated for the secondary school still rests with Arun DC. It is noted that the consultants have recommended Site L as the preferred option ‘as it provides greatest certainty by not being reliant on nearby schemes and having the fewest risks’. However, when you compare the comments in the summary for each site there is little to choose between any of them. Also, it is understood that the Ford promoters are able to deliver the school as the land is in their current ownership and current residents of Ford are understood to be accepting of the secondary school.</p> <p>Throughout discussions WSSC have always asked that any school site is best situated to encourage walking, cycling and public transport modes of travel rather than encourage car journeys.</p> <p>It is not clear from the documents how “available” option L is. WSSC suggest that sites F & L rank above C but can’t state in what order.</p>	<ol style="list-style-type: none"> 1. Sites F & L 2. Site C
WSSC – Highways and Transport	yes	<p>Following on from WSSC comments, a view from a highways and transport perspective is as follows.</p> <p>There is risk to any of the sites; the Systra report sets out the risk to delivery of site L should the Ford site not come forward, but does not give as much weight to the issues raised by WSSC on site L as to site availability and the studies own comment regarding site L still requiring investigations to determine if contamination is present. The Systra study has also made some</p>	<ol style="list-style-type: none"> 1. Site F 2. Site L 3. Site C

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		<p>simplified assumptions, reflecting the compressed period under which the study has been taken forward. This includes that the school pupils would only travel from the allocated strategic sites, that it would not alter the school choice for the surrounding existing area and that all pupils from the new strategic sites would attend the new school in preference to existing schools. It also includes that the link road access for the site F proposed to be provided has not been modelled as a sensitivity assumption, given that any such modelling would have to be notional in the absence of an agreed alignment and design.</p> <p>On the basis of the existing situation the order of ranking which Systra have suggested is understandable, however discussions are ongoing with the Ford site F and with the envisaged infrastructure this would offer an advantageous site.</p> <p>Site F would offer a site which is centrally located for the strategic areas. It would be in a quieter location than site L away from the main road, but be served by sustainable transport links to be provided by the Ford strategic development including new and improved pedestrian and cycle links and amended bus routes and service patterns. Site L would be on the other side of the Yapton Road, which would continue to be a busy route for through traffic from a lot of the homes in walkable distance and much of the walking routes to the site would continue to be alongside the road carriageway.</p> <p>Site C has the one main advantage of the rail access from Ford station, but for pupils from the allocated strategic sites this is only an advantage for pupils from the part of the BEW site which is in closer walking distance of Barnham station, which is to the eastern end of the BEW site. Elsewhere in the BEW site, bus is likely to be the main sustainable mode choice for school travel, whilst site C is worse for location and convenience of sustainable access from the Yapton and Ford strategic sites.</p> <p>On the basis of this rationale, it would be consider that for transport and access, once WSCC have greater certainty on the Ford strategic sites timescales and phasing of infrastructure package then the ranking is likely to change to be site F first, site L second and site C third.</p>	
Network Rail		<p>During the conference call, the Network Rail officer voiced concern over the impact on both Ford and Barnham stations. The preference was to encourage cycling and other sustainable methods of travelling due to capacity constraints at the station so option C was not encouraged. It</p>	<p>1. Site F/L</p>

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		<p>was anticipated that Ford mitigation may include a £1/2 M foot bridge as a minimum. The Council was promised a written response from Network Rail following a conference call on 8th January 2019. The short email response confirmed that Option C was not a good location for the school.</p>	
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