

▫SHARE Representation on OTH38

1. SHARE (Sustainable Hillside and Rokeby Education) is a residents group founded in the light of WCC's decision to meet a shortage of secondary school places in the North of Rugby by taking open space in the South of Rugby.
2. SHARE notes WCC's failure to follow the advice they provided for the Core Strategy to meet growth in the North by building a secondary school on the Rugby Radio Masts site – see appendix 1. This failure comes despite RBC's grant of planning permission for a secondary school on the Rugby Radio Masts site in May 2014 and WCC holding a signed section 106 agreement with the developers which enables the county council to exercise a "School Site Call Notice" procedure.
3. WCC's failure to properly plan for school places in Rugby was set out in SHARE's document *Report and Objection on Outline Planning Application: Addendum – Educational Need Review RBC/16CC016* (April 2017). SHARE would be happy to provide a copy of this document to the Inspector on request.
4. The Coton Park East site was identified by SHARE as one of the sites in the North of Rugby which WCC could have developed to provide sustainable secondary school provision in our town.
5. SHARE notes that on the county council's own figures, see page 3 of OTH38, there will be a shortage of secondary school places in almost every year of the Local Plan period with deficits of 690 places in September 2021, 559 places in September 2024 and 238 places in September 2026. SHARE notes that these deficits are calculated after taking account of the full capacity of each new school being available from the year of opening despite WCC's practice being to open new schools one year at a time.
6. SHARE has no confidence that WCC will be able to create new places by placing extra accommodation on the Avon Valley School site. This was their plan in the 2011 Core Strategy. They failed to do that then. Avon Valley School's decision to leave the control of Warwickshire County Council and become part of a Multi-Academy Trust makes it more difficult for the county council to achieve now.
7. A shortage of school places where they are needed will lead to endless criss-crossing of the town centre by motor vehicles as secondary school children are shunted into any available place miles from home. The county council's failure to provide safe routes for school which cross the town centre will exacerbate the problem. There will be more vehicles on Rugby's roads, more congestion and more air pollution around the Gyratory and surrounding roads. I have made repeated

representation to both RBC and WCC about their failure over several years to make any attempt to control pollution in the town centre. These have been ignored. I believe you can no longer do this and need to take this pollution seriously. I have noted many times that the areas of worst pollution is at Dunchurch and around Rugby school. I will be writing to the head of Rugby school to get his views on the potential health issues for his staff and pupils

8. The county council should make use of its existing planning permission and provide for the children who are now arriving in Houlton, services could be brought on site and a secondary school started in temporary accommodation by September 2019 followed by the opening of permanent school premises in September 2020. A new secondary school could be provided on the Coton Park East site by September 2021 using funds which have already been earmarked by central government for a new secondary school in Rugby.
9. With regard to SW Rugby SHARE has concerns regarding both the timing and size of this school. Previously, see appendix 2, the county council had said that this school should have 8 to 9 forms of entry for the SW Rugby development alone. In OTH38 the county council reduce this requirement to 6 forms of entry. The county council provide no explanation for this reduction in requirement. RBC expect the first houses in SW Rugby to be built in 2018-19. WCC should not delay providing the children living in these houses with a secondary school until September 2025.
10. All new secondary schools should be linked to a comprehensive footpath and cycling network to enable their pupils to reach them safely.

N Burton

Chair of Sustainable Hillside & Rokeby Education

My ref: TE/PS/slk

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Appendix 1. WCC evidence for the 2011 Core Strategy

3rd June 2010

Dear Robert,

Rugby Borough Council – Local Development Framework

Education impact of:

The Rugby Radio Station site
Gateway housing developments
Cawston Area Site

Further to our previous response and following further work on the expected pupil yield as a result of new housing, I set out below our current assessment of the impact of these two major developments.

Rugby Radio Station

I refer to the Background Paper V.1 dated March 2010. Can I first of all express my concern that although paragraph 1.5 of the document refers to the impact on education provision requiring 'at least one secondary school and three primary schools or as agreed with the Local Education Authority', reflecting the uncertainty set out in our recent discussions, paragraphs 2.16 and 2.17 appears to reintroduce a certainty based on the lowest level of provision for both primary and secondary school places. Table 6 appears to indicate provision of just 8 hectares for secondary school provision and 7 hectares for secondary provision. Neither of these figures represents an accurate assessment of the requirement for schools. Similarly, an infrastructure provision for Education of £24,250,000 will be inadequate.

Our revised request taking into account the rising number of births in Rugby and our experience of the pupil yield of similar developments in the Borough is set out below. We have given considerable thought as to how the County council can best manage the many uncertainties and variables inherent in calculating the impact of the proposal. The only sensible approach is to set out our minimum requirement and then a reserved position that would enable the County Council to discharge its legal obligation to provide places should the pupil yield be toward the upper end of our calculations in terms of both a higher capital figure and the reservation additional sites (to be returned to the developer should the additional sites not be required).

Secondary

Our revised assessment is that there is will be a need for 1567 secondary school places (11-16) and 276 post 16 places. Although this would indicate a basic requirement for an 1800 places secondary school, in order to manage some of the uncertainties alluded to earlier in this letter, it is requested that site be able to accommodate up to 2000 secondary pupils giving a site required of 12.5 hectares. You may also be aware that the County Council is also considering developing the site as a hub facility, co-locating a range of County Council and none County Council functions. The site area of 12.5 hectares is therefore in respect of the school requirement only and further land would be required to enable the co-location of additional facilities.

The reserve position is that the need for secondary school places may be 1907 11-16 pupils plus 336 post 16 pupils, giving a total need for 2243 pupils. In order to organise this number of pupils a second secondary school may be required. It is considered therefore that a further site for 1100 secondary pupils should be reserved at some 7.6 hectares. Were this second site to be needed, the requirement for the first site could be scaled down to a similar size and the surplus area returned to the developer.

Primary

Our revised assessment is that there is will be a need for 2194 primary school places and 313 nursery places. The basic requirement therefore is for five, 420 primary schools and the site required plus room for two nursery classrooms per school is calculated at 1.9 hectares per school.

The reserve position is that the need for primary school places may be 2670 pupils plus 381 nursery pupils. In order to organise this number of pupils a sixth primary school may be required. It is considered therefore that a further site for primary pupils should be reserved at some 1.9 hectares. Were this sixth site not to be needed, the reserve site would be returned to the developer.

Contributions will also be required for special education provision and the youth service.

I hope that this information is helpful and if you have any queries please let me know.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Phil Astle'. The signature is written in a cursive style with a prominent 'P' and 'A'.

Phil Astle
Assistant Head of Service - Service Planning

Appendix 2 – WCC evidence for the new Local Plan

Rugby Local Plan – Education Requirements August 2016

RESIDENTIAL ALLOCATIONS - AUGUST 2016						
		Estimated Pupil Yield			Approx. Forms of Entry	
Site Name	Dwellings	Primary	11 to 16	Post 16	Primary	Secondary 11-18'
Rugby Urban Edge	13455	4620	3301	581	22	25
Coton House	100	34	25	4	1 to 2	1 to 2
Coton Park East	855	294	210	37		
Rugby Gateway	1300	446	319	56	2	2 to 3
Rugby Radio Station	6200	2129	1521	268	10	10 to 11
South West Rugby	5000	1717	1226	216	8	8 to 9
Garden Village	1500	515	368	65	2 to 3	2 to 3
Lodge Farm, Daventry Road	1500	515	368	65	2 to 3	2 to 3
Main Rural Settlements	540	185	132	22	up to 1	up to 1
Land at Sherwood Farm, Binley Woods	75	26	18	3	Up to 1	Up to 1
Land off Lutterworth Road, Brinklow	100	34	25	4		
Land North of Coventry Road, Long Lawford	100	34	25	4		
Leamington Road, Ryton on Dunsmore	75	26	18	3		
The Old Orchard, Plott Lane, Stretton on Dunsmore	25	9	6	1		
Land off Squires Road, Stretton on Dunsmore	50	17	12	2		
Linden Tree Bungalow, Wolston Lane, Wolston	15	5	4	1		
Land at Coventry Road, Wolvey	10	3	2	0		
Wolvey Campus, Leicester Road, Wolvey	90	31	22	4		
Total	15495	5320	3801	668	24 to 26	28
Total (excluding Gateway and Radio Station)	7995	2745	1961	344	12 to 14	14

SEND provision: The LA also has a duty to ensure sufficient and appropriate education for those children with SEND. Provision for these learners could encompass increasing provision in both special school and mainstream settings. As well In terms of Early Years provision, there is likely to be a need to increase sufficiency through the expansion of existing provision or the creation of new provision in some of these rural settlements.

Early Years Sufficiency: The LA has a duty ensure sufficient childcare for children aged 014 and free early years provision for eligible young children. There will be a need to increase sufficiency through the expansion of existing provision and/or the creation of new provision across the rural settlements, Rugby Town and Lodge Farm

Primary Provision: There will be a need for new provision in the North of the Town, in South West Rugby and the Garden Village. Some additional capacity maybe required across the Rural Settlements. There are likely to be transport implications as a result of development in the rural settlements and the Garden Village

Secondary (including 6th Form) Provision: In addition to the secondary provision being made on the Radio Mast Site (10 to 11 FE), the places that would need to be provided as a result of The Gateway development (2 to 3 FE) through increasing capacity in existing provision or new provision, and that that would be provided as part of South West Rugby (8 to 9 FE), it is estimated the remaining new allocations would still create the need to provide new secondary school provision for at least an additional 5 forms of entry (11 to 18) in Rugby Town. Taking into account the large amount of already committed developments still to be constructed in the town, the already limited scope for increasing capacity in existing schools is likely to utilised, and therefore new provision will be needed to accommodate the new allocations.

Considering the location of current and future provision, the need is going to be predominantly in the North of the Town where there is currently one secondary school with limited scope for expansion. The Local Authority has a statutory duty to provide free transport for pupils (5-16) if their nearest school is beyond a 2 mile walking distance for primary age children and beyond 3 miles for secondary age children. Current and proposed development for the North of the Town has seen and will continue to see the demand for school places in the local area rise but the supply of secondary school places within a 3 mile walking distance of this demand cannot currently be increased. Failure to provide additional school places in the North of Rugby will leave a gap in pupil place sufficiency, impact on the promotion of sustainable travel and places further pressure on the school transport/transport infrastructure and budget. Also placing too much provision in an area can impact on the viability of the existing provision in that area.

Rugby Free Secondary School is due to open September 2016 and is required to accommodate current demand as a result of historical development in the Town. Ashlawn Secondary School has recently received approval of their application to open a Free School in the area over the next couple of years. The location of this school has yet to be confirmed. If this school were to open in a suitable location in Rugby than this could address the 5FE shortfall in places that would be created by the new residential allocations

Main Rural Settlements

Approximately 180 additional primary pupils could be yielded across the rural area as a result of the proposed allocations. The short term/immediate impact of a development on education in these settlements is likely to be the need for the LA to transport pupils to the next nearest school with places in the required year group

In the longer term there may need to be some changes in transport arrangements/routes for those on the periphery of priority areas. Temporary or permanent accommodation may need to be an option in some areas such as Brinklow, Wolvey and Long Lawford. Long Lawford needs additional accommodation to meet current demand and therefore without this accommodation further development will add to this requirement to provide additional pupil places in Long Lawford or elsewhere.

In terms of **secondary school provision**, as well as the need to increase provision within the town additional transport costs will be incurred.

Binley Woods: Binley Woods Primary School

Majority of the children in area attend the school. There is little movement from and to other out of area Warwickshire schools. There is some fluctuating intake from out of county. It is anticipated that there should be sufficient capacity to accommodate the residential allocation in the long term

Brinklow: The Revel CofE Primary School

The school operates across two sites; with the main site in Monks Kirby and the Reception unit in Brinklow. Therefore, potential additional transport costs could be incurred if transporting more children to the main site in Monks Kirby. A large priority area that borders Rugby Town. Approximately two thirds of children attend the school from within the area with the remaining third comprised mainly of pupils from Rugby Town. The Gateway development currently falls within The Revel's priority area; however, only a very small number of pupils from this development currently attend The Revel with the majority attending closer schools in Rugby Town. The introduction of the new school on The Gateway in September 2019 or September 2020 will alleviate some of this potential demand.

In the long term, pushing back pupils to other areas in Rugby should enable the school to accommodate this allocation and the large majority of its current priority area (excluding The Gateway and Coton House)

Long Lawford: Long Lawford Primary School

Currently requires additional accommodation to meet current demand. A consultation is currently underway (September 2016) to increase the capacity at the school from 420 to 630

pupils and a planning application to expand the school is still to be determined. Over 80% of pupils attending Long Lawford School reside within the priority area. In recent years, the demand for places in the Cawston, Bilton and Central Rugby area is likely to have reduced the number of Long Lawford priority area children obtaining a place outside of the area. It is anticipated that no further capacity would be required if the current proposal to increase the school from 2FE to 3FE goes ahead.

Ryton on Dunsmore: Provost Williams CofE Primary School

Approximately three quarters of pupils in the priority area attend Provost Williams. Historically a small amount of pupils have attended nearby Knightlow Primary and Our Lady's Catholic Primary School. It is anticipated that there should be sufficient capacity to accommodate this allocation in the long term

Stretton on Dunsmore: Knightlow C of E Primary School

Priority area covers a large rural area with fluctuating cohort numbers. Several pupils in each year group from Wolston St Margaret's and Provost Williams areas attending the school. It is anticipated that pupils in the area can be accommodated at the school in the long term although there will be a push back of pupils into areas already under pressure such as Wolston.

Wolston: Wolston St Margarets CofE Primary School

Approximately a third of pupils living in this priority area have been able to attend a preferred school in the neighbouring settlements. Proposed development in these neighbouring areas could result in more pupils being pushed back and needing to be accommodated in this priority area school. Some transport costs are likely to be incurred. Development in this settlement should be kept at the minimum allocation.

Wolvey: Wolvey CofE Primary School

The majority of pupils attending this school reside within the priority area. Some pupils from the priority area choose to attend schools in Bulkington. It is likely that the push back effect of development in Bulkington would mean that in the short and long term further residential allocations in Wolvey would result in the school being unable to accommodate all pupils within their catchment area. Therefore, both accommodation

Rugby Town North

Additional primary provision (1FE to 2FE) required in this area of the Town – site identified on the Coton Park East site. Site will need to be available in initial stage of development (Phase 2)

In addition to the secondary provision being made on the Radio Mast Site and South West Rugby, the remaining new allocations could still create the need to provide new secondary school provision for at least 5 forms of entry (11 to 18) in Rugby Borough. Considering the location of current and future provision, the need is going to be predominantly in the North of the Town where there is currently one secondary school with limited scope for expansion.

South West Rugby

Both Primary and Secondary Land provision to be made straightaway

In terms of primary provision, 5000 homes are estimated to yield around 8FE. This could equate to four 2FE primary schools. At least one of these primary schools should have the potential to expand to 3FE. One of the primary schools could also be co located with the secondary provision. Following the IDP, in terms of delivery of land for education, the first primary and secondary provision would be received during Phase 2. Land and delivery of second 2FE primary school during phase 3, with the third potentially during phase 4.

Lodge Farm

Primary Provision – 2FE primary school with potential to become 3FE. Land to be made available in the initial stage of development. The sooner provision can be made the lower the transport costs the development is likely to incur

Secondary Provision – adding to demand in the Town and will require home to school transport. Costs could be lower with suitable public transport in place