

SECONDARY SCHOOL – STRATEGIC SITE A46

There is no justification for a new secondary school in Normandy. The proposed school did not even feature in the 2014 version of the draft Local Plan but suddenly appeared in early 2016. Surrey County Council's 'School Organisation Plan' of December 2015 contains no reference to the need for additional school places in the west of the Borough. It appears that this is a "developer-led" proposal and in return for being allowed to build 1,100 homes, the developer will provide the serviced land to allow the Council to put a secondary school on the site.

It is understood from the responses to Freedom of Information requests, and conversations with Surrey County Council Officers by residents of the village, that no proper consideration has been given to the most suitable location for a school, nor for that location to be supported by a safe road network. It has been confirmed that only informal discussions have taken place between Surrey County Council and the developer with regard to this being a suitable site for a school and the County Council have said that they have not undertaken any specific research on the ability of local roads to cope with traffic that may be associated with a new school.

In its official response to Guildford Borough Council in July 2014 to the previous draft Local Plan, Surrey County Council said, "A site within the proposed urban extension at Blackwell Farm, with all necessary access infrastructure built in and a catchment surrounding the site, would be a more sustainable location in transport terms for a new secondary school to serve the western side of Guildford." It is concerning that Guildford Borough Council has not heeded this advice.

In the draft Local Plan it is stated that the provisional size of the new secondary school would be 7 forms of entry (7 x 30 children = 210 per year group, for Years 7 to 11 = 1,050) but only 1 form of entry (30 children) from the Normandy/Flexford development would need a place at the new secondary school, with other children coming from the wider area including the Blackwell Farm strategic site and Ash.

It is clear, therefore, that there is no need for a secondary school simply to serve the proposed housing development on the Normandy site, as a 1 form of entry school would not be viable.

Surrey County Council, as the Commissioner of school places, has confirmed that without taking into account any additional housing created by the draft Local Plan, there are no proposals for a new secondary school in the area west of Guildford. They have also said that it is too early to define the admission number of the proposed school in Normandy as this would be largely dependent on the number of housing developments progressed for which a new school may serve, taking into consideration any capacity in existing schools closer to the time when the places are needed. The provisional size is up to 7 forms of entry (210 children a year) in order to ensure sufficient provision is considered in line with possible housing.

This response clearly shows that Surrey County Council has no idea of the number of pupils that will require a place at the school, nor if existing schools could accommodate the pupils instead of building a new school. If fewer developments are progressed than expected the Published Admission Number (total number of pupils on roll) of the school may well fall below 150, which Surrey County Council has stated is the minimum number required to make a school viable. Therefore it does not make sense to progress with a school if there is a possibility that there will be insufficient pupils to make the school viable. The land will be removed prematurely from the Green Belt without any assurance that the school will ever be built.

Given the poor road links to and from the development site, it does not make sense to transport in a further possible 840 children a day (1,050 children minus the one form of entry from Normandy, $30 \times 7 = 210$), with all the inherent dangers at drop off and pick up time. Alternatives should be looked at, such as enlarging Ash Manor school, or others, to take these 30 children, which would be a much cheaper option. The possibility of enlarging other secondary schools in Guildford should also be looked at as an alternative, as none of these schools is anywhere near approaching the planned admission number of 360 pupils, which the Surrey County Council "School Organisation Plan" states is the maximum in order to be viable. The overall Published Admission Number for all 7 secondary schools is only 1426, or an average of 204 (or 211 taking into account the proposed planned increased numbers at St Peter's and Guildford County), whereas the School Organisation Plan states that the viable number is between 150 and 360. Alternatively, Guildford Borough Council should seek another site for the school that has safe transport links and does not destroy this sensitive red Green Belt site. Or approaches should be sought from Academies or Free Schools to sponsor new secondary school/schools in the Guildford borough.

The expansion of existing schools would better keep pace with the demand from new housing, and also take account of the declining birth rate which has already been noted. If this development did take place, unless the school was built first, or in stages, children would have to go to a secondary school somewhere else, and this would reduce the planned admission number below what is viable (Surrey County Council has stated that this development would yield 157 pupils a year and that the minimum Published Admission Number needed to make a school viable is 150). Building a school in stages over a number of years is not practical as facilities such as PE, Science, Technology, Art etc. will be needed from day 1, as well as general teaching spaces, playgrounds, sports pitches etc. The idea of the concept masterplan is fine, but it shows the actual completed development, with the children from all the houses attending their local secondary school. In reality this will never happen. It is especially concerning that in Appendix C of the "Infrastructure Study", there is no delivery date against the completion of the school, which indicates that this school may not be constructed until after the housing is built. In the meantime the children of secondary school age will have been placed in secondary schools elsewhere, and the school will not be needed. If the school is not needed the Green Belt must be protected.

From responses to Freedom of Information requests it is clear that there has been no serious attempt by Guildford Borough Council nor Surrey County Council, as the Commissioner of school places, to establish the need for a new Secondary school to the west of Guildford, nor to ascertain whether the funding to build the school would be forthcoming from the Department for Education. To include a proposal in the draft Local Plan that seeks to justify building 1,100 houses in the Green Belt on the back of an unsubstantiated need for a school, rather than on an objective analysis, seems highly irresponsible. The land would be removed from the Green Belt without any assurance that the school would ever be built.

The Leader of Guildford Borough Council has maintained that, before the Extraordinary Meeting of Guildford Borough Council on 24 May 2016, Surrey County Council had reaffirmed the need for a school in the west of Guildford, although it transpired that this was purely on the basis of "informal discussions". In other words, a new strategic site, A46, which had not featured as such in the previous consultation, was included in the Submission Local Plan on the basis of nothing more than informal consultations about the likely future requirements for secondary school places. This hardly constitutes the serious decision making that would be expected to define the "exceptional circumstances" that are required to redraw the boundary on this sensitive Green Belt site.

Additional information relating to the secondary school

It is understood that, where a Local Authority identifies the need for a new school, it is under a duty to seek proposals to establish a Free School.

Freedom of Information requests to Guildford Borough Council and Surrey County Council show that no approaches have been made to sponsors or proposers to set up a Free School. Surrey County Council has said that this would only happen when the new school is progressed. Therefore the land could be taken out of the Green Belt on the assumption that a sponsor or proposer may be found, but this may not happen. By then the land would have been removed from the Green Belt and the school may never be built.

Freedom of Information requests were made to Guildford Borough Council and Surrey County Council to find out what considerations had been given to enlarging existing schools.

On the one hand Surrey County Council concluded that there is limited scope to enlarge existing schools or increase rolls. But then, when asked about what size the school might be, they said that this would be largely dependent on the number of housing developments progressed for which a new school may serve, **taking into consideration any capacity in existing schools closer to the time when the places are needed.** This contradicts the earlier answer and it appears that Surrey County Council does, in fact, accept that there may be spare capacity in existing schools.

From Freedom of Information requests it appears that there have been no formal meetings between Surrey County Council, as Commissioner for school places, and the Headteachers or Governors of Secondary Schools in Guildford Borough, including those just over the County Boundary in Hampshire, regarding strategies for increasing their intake if their school is undersubscribed, enlarging the published admission numbers for their school or enlarging their school premises to increase their admission number, as opposed to building a new secondary school in the west of the Borough.

Nor, it appears, have any financial calculations been made to compare the cost of enlarging existing schools in Guildford Borough, to cope with increased numbers of pupils arising from the draft Local Plan, with the cost of building a new school at Normandy. It is also clear that there have not been any discussions with Headteachers or Governors about the impact that a new school may have on existing schools. This is because Surrey County Council does not believe that it is possible to expand existing schools.

However, research by the village's County Councillor has shown that the responses from Surrey County Council may not accurately reflect the situation, as many existing schools are actually undersubscribed and others would be happy to expand, with the existing capacity making a new school unnecessary, taking into account the planned expansions at Guildford County and St Peters. Headteachers and Governors of these other schools are concerned that a secondary school in Normandy would take pupils from their schools, reducing their numbers.

The County Councillor's research shows:

- Kings College is currently 57% undersubscribed. The capacity at the school is 900 pupils, and there are only 389 on the school roll (43% utilised) with 511 vacancies. There is capacity on that site to further expand the school, to accommodate more pupils well into the 2020's if then needed
- The Headteacher of Kings College says, *"There is absolutely no need for another school in Guildford; its crystal clear"*

- The New Guildford University Technical College, due to open in 2018, will take 240 pupils from the age of 14 in its first year, and that will double to 480 places, relieving pressure on other schools
- Christs College is already taking 30 more pupils a year than its admission number, because it has the space and capacity to do so, and is willing to take more still as it has further capacity
- Ash Manor, Ash, has a capacity of 1,050 and it has 940 pupils, so is undersubscribed by 110 places. The Governors are supportive of the school being expanded to take more pupils by 30 places a year (so a total of an extra 150).
- The Head and Governors of Ash Manor School have very strong concerns about a new school in Normandy, just three miles away, and the possible negative effects on their intake. Other Headteachers must have the same fears
- Connaught School, just over the County Boundary in Hampshire, is also undersubscribed by 90 places and is available to Surrey children
- Hoe Valley Free School, Woking has an intake of 120 per year, with currently 95 pupils, so is undersubscribed in its first year by 25 and welcomes applications from Guildford parents. It will build up with 120 new places available every year for 7 years - making a total capacity of 840. It has no catchment area, and although it will mainly serve Woking, it will welcome applications from Guildford parents

So, there are currently 736 vacancies at the nearest secondary schools serving the western parishes - not accounting for the 480 extra at the new Technical College to open in 2018, and Guildford Borough Council is already providing 20 additional places a year at Guildford County and 30 places per year at St Peters from September 2017.

The above vacancies are the equivalent of more than a whole secondary school, which negates the need to build a new school at this strategic site. Coupled with this, the birth-rate in Guildford has fallen over the past two years, and whilst it is too early to know if that trend will continue, it is another factor to urge caution, and not to proceed to build a new secondary school at this time.

A Freedom of Information response from Surrey County Council shows that the proposed secondary school in Normandy would serve Normandy, Blackwell Farm and Ash, which could be around 4,366 homes. The Blackwell Farm site could potentially accommodate 1,800 houses and have a need for a 2 form entry (60 children) Primary school. This would project into 2 forms of entry that would need secondary school accommodation from Year 7.

Therefore, there is a need shown between the Normandy/Flexford and Blackwell Farm sites for 3 forms of entry (90 children a year). This leaves 4 forms of entry (120 children a year) to serve the wider area.

If the Normandy/Flexford and Blackwell Farm sites produce 3 forms of entry from 2,900 homes, this means that the remaining 4 forms of entry would come from 1,466 homes, so somehow the maths does not add up here and shows yet again that Guildford Borough Council does not know the number of pupils that will require a place, but are happy to remove the land from the Green Belt without any assurance that the school will be built, as the number of pupils requiring a place may not make the school viable.

Department for Education guidance states that, when planning for a new school, Councils should satisfy themselves that accessibility planning has been properly taken into account and they should bear in mind that a proposal should not unreasonably extend journey times or increase transport costs, or result in too many children being prevented from travelling sustainably due to unsuitable walking or cycling routes. The guidance also states that effective plans should reduce car use, reducing congestion caused by school runs.

The guidance stresses repeatedly the message that local walking, cycling and bus strategies should inform the local authority's duty to promote sustainable school travel and that this should provide health benefits for children through active journeys, such as walking and cycling"

The draft Local Plan states the need for an off-site cycle network from the land to the south of Normandy and to north of Flexford site to key destinations including Wanborough railway station and to the Christmas Pie Trail, with improvements to a level that would be attractive and safe for the average cyclist. This will not be delivered until 2021/2033, is not costed and will be paid for by the developer. It could be that the cycle network is not completed until 2033, 17 years in the future, which would preclude its use as a means of getting to school for a generation of cyclists

The Christmas Pie trail itself is not mentioned for improvement, and is a convoluted route both west and east, which is unlit, muddy, often flooded and passes through dense woodland and is hardly a child-safe route.

There is no information in the draft Local Plan about any proposals for safe walking routes from the Blackwell Farm development or from the Ash direction to this strategic site.

As there will not be safe cycling and walking routes from either the west or the east of the site, parents will undoubtedly bring their children to school by car, against Department for Education guidance. No pre-planning has been carried out on the road infrastructure to ensure that these journeys will be safe, as shown below.

A Freedom of Information request asked what research has taken place to see how the local rural roads will cope with the increase in traffic that the new school will bring, especially with regards to the railway bridge in Westwood Lane which only accepts one-way traffic and has a height limit, and the dangerous hump-back bridge in Glaziers Lane which has a weight limit. The request also asked what road safety issues concerning parents parking on Glaziers Lane and Westwood Lane to drop off and pick up their children have been considered?

Surrey County Council responded that Surrey have not undertaken any specific research on either the ability of local roads to cope with traffic that may be associated with a new school, or on road safety issues specifically related to parents parking on Glaziers and Westwood Lanes. They say that this would be looked at as part of the planning application process.

Surrey County Council admits that no planning has taken place about whether the local roads provide a safe infrastructure for the school or could cope with the increased traffic that a new school would bring. Neither have they considered the road safety issues of parents parking in the narrow country lanes around the development. Therefore, it could be decided at a later stage that the roads are not safe and are not able to cope with the increased traffic, but by then it would be too late to prevent the construction of 1,100 homes as the site would already have been taken out of the Green Belt.

Freedom of Information requests show that little or no consideration has been given to accessibility planning for a new school. When asked how pupils will be transported to the secondary school the response was that this will be determined and planned in detail at a later stage, and that the draft Local Plan includes appropriate train routes.

So Surrey County Council admits that no planning has yet taken place about the transportation of pupils to the school. The response also indicates that the land could be taken out of the Green Belt before any decisions have been made about the safe

transportation of pupils to the school. Therefore, it could be decided at a later stage that this would not be a safe site for a school, but by then the land would have been removed from the Green Belt.

The response that the draft Local Plan includes appropriate train routes is misleading as the station from the Blackwell Farm development (Guildford West – Park Barn) may not be completed until 2029, 13 years in the future, although the school on the Normandy site would be expecting take 300 children from the Blackwell Farm development, without train, cycle or pedestrian links.

The draft Local Plan makes it clear that funding will be needed for the construction of the school as it is stated that “The site will provide **land** for a 7 form entry secondary school.” Freedom of Information requests show that no consideration has been given to funding for a new school. Surrey County Council has said that it is too early for considerations to have taken place.

So, if the proposal for the new school has to be rejected because capital funding for the construction is not forthcoming, then the land would have been removed from the Green Belt and the school would never be built.

Guildford Borough Council has to show that the provision of a school constitutes the “exceptional circumstances” that are required to redraw the boundary on this sensitive Green Belt site, thus removing the site from the Green Belt in advance of development. As has been shown, there has been no serious attempt by Guildford Borough Council nor Surrey County Council, as the Commissioner for school places, to:

- establish the actual need for a new Secondary school to the west of Guildford
- establish if this is the most preferable site for a secondary school
- research whether existing schools can be enlarged or the Published Admission Number increased
- ascertain whether the funding to build the school would be forthcoming from the Department for Education
- research whether the road infrastructure can support a new school and is safe to do so
- research whether there is the infrastructure to allow pupils to cycle or walk to the school safely from sites to the east and west

Therefore no “exceptional circumstances” have been shown.

The argument that this is an “enabling development” is circular as the claim that the school is needed rests on the argument for building additional houses on this and other sites, but the houses on this site can only be built if the school is allowed to be built. So it amounts to putting up houses to justify a school that would not be needed if the houses were not built.

Because of the above points, it is believed that Guildford Borough Council’s lack of planning, with regard to the provision of a new school on this sensitive site, has not shown that there any exceptional circumstances that would allow the site to be removed from the Green Belt, and an objection to the proposal is made on the grounds given.