

VINCENT+GORBING

**North Hertfordshire Local
Plan Examination in Public
Statement in respect of
Matter 1: Duty to Co-operate**

On behalf of
Hertfordshire County Council

October 2017

Prepared by
Vincent and Gorbings



STATEMENT IN RESPECT OF MATTER 1: DUTY TO CO-OPERATE

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1.0 STATEMENT IN RESPECT OF MATTER 1

- 1.1 Vincent and Gorbing have been instructed by Hertfordshire County Council (HCC) to prepare this statement. The statement has been prepared by Mrs Ruth Gray (Associate Director) BSc (Hons) MPhil (Dis) MRTPI. Ruth Gray has over 30 years town planning experience and has been commissioned over the past 15 years (whilst working at Vincent and Gorbing) to provide town planning advice on a number of projects for HCC. In particular Ruth has undertaken, over the last 7 years, a number of site search exercises for primary and secondary schools to inform the education infrastructure requirements for emerging Hertfordshire local plans. Ruth has appeared at the Three Rivers District Council Examination in Public in 2013 giving evidence in respect of education requirements and consequently has assisted the County Council in securing new secondary school site allocations in the Three Rivers Local Plan.
- 1.2 Vincent and Gorbing have also been assisting HCC in respect of secondary school provision at Stevenage and other neighbouring districts over the last 18 months. In particular Vincent and Gorbing have carried out site searches in Stevenage, Welwyn Hatfield and Broxbourne, meeting with all these authorities to understand cross boundary strategic provision issues and requirements.
- 1.3 The Localism Act 2011 Part 6 Chapter 1 para 110 imposes a Duty to Co-operate (DtC) in relation to the planning of sustainable development by local planning authorities and County Councils. In particular the duty imposed requires them to “engage constructively, actively and on an ongoing basis”¹ It is noted that Planning Practice Guidance para 004 further advises that “local planning authority officers and councillors are responsible for leading discussion, negotiation and action to ensure effective planning for strategic matters in their local plans. This requires proactive, ongoing and focussed approach to strategic planning and partnership working”. It is also noted that at para 009 that “the duty requires active and sustained engagement from the outset of plan preparation to maximise the effectiveness of strategic planning and partnership working” and that para 011 requires that “co-operation should take place throughout local plan preparation – it is important not to confine co-operation to one point in the process”.
- 1.4 The matter for this Examination is whether the legal duty and the fulfilment of that duty through the Planning Practice Guidance has been fulfilled by North Hertfordshire District Council (NHDC) and HCC in this respect. This statement examines the evidence of cooperation over the period November 2012 – October 2017.
- 1.5 HCC contend that NHDC has not fulfilled its DtC in respect of secondary education generally but more particularly through the lack of proposed infrastructure to meet a need arising from forecasted increases in requirements as a consequence of demographic pressures in north Stevenage, allocated housing sites in the Stevenage Local Plan and proposed housing allocations at North Stevenage in the North Hertfordshire District Plan. This contention is not undertaken lightly by HCC.
- 1.6 A timeline of evidence (November 2012 – October 2017) has been prepared to show the level of engagement between the two authorities in respect of the above matters. It is attached at Appendix one. It begins with most recent activities and works back to November 2012. Detailed evidence connected with this timeline is set out in Appendix two.

¹ Localism Act 2011 Chapter 20 Part 6 Planning Paragraph 110 (2)

- 1.7 It is clear from the timeline in Appendix One that there has been an ongoing dialogue between the two authorities since 2012. Indeed NHDC acknowledge this in their Duty to Co-operate Compliance statement (June 2017) para 2.17. NHDC also acknowledge at para 2.11 that “case law establishes that the DtC applies to the preparation of the plan and runs until the point of plan submission”. NHDC further contend in their letter to HCC² that “having reviewed the audit trail of correspondence and meetings between us, I consider that we can robustly demonstrate active and ongoing attempts to effectively co-operate with HCC to address education issues as the plan was developed”. NHDC also note that the DtC “does not impose a statutory requirement to agree”. In the DtC statement NHDC refer to meetings held on 28 November 2014, 12 February 2015, 4 April 2017 and 24 April 2017. A request for these meeting notes was sent to NHDC on 17 October 2017 and was received on 23 October 2017.
- 1.8 HCC contends that DtC requires not just an audit trail of meetings and correspondence but “a constructive and active and ongoing” requirement as set out in the Act 33(A) (2). It is clear that the main purpose and thrust of the DtC is to achieve effective strategic policies. HCC contend that NHDC have failed in respect of this part of the Act.
- 1.9 HCC obtained planning consent for a new secondary school on land north of Great Ashby in April 2010 as part of the Government’s Building Schools for the Future (BSF) Programme. The decision notice is attached at Appendix 3. The planning consent was never implemented as the Government withdrew funding for BSF projects and the consent lapsed in April 2013.
- 1.10 As early as November 2012 NHDC wrote to HCC (along with other infrastructure providers) asking for a response to the NHDC Emerging Options Consultation letter. HCC was clear in its response³ that, based on the predicted housing numbers, there was a requirement for a new secondary school north-east of Stevenage citing the then extant planning permission obtained at Great Ashby [the Great Ashby site] and requesting that this site be reserved as a secondary school allocation. At that point HCC also set out a justification of a child yield of 1FE per 500 dwellings.
- 1.11 The NHDC response in their February 2013 Local Plan Housing Options Growth Levels Consultation Paper to this initial representation was to reference the previous secondary school planning permission in a large parcel of land north-east of Stevenage. In response⁴ HCC re-stated the requirement for the Great Ashby site to be reserved as a secondary school allocation and reiterated the justification of a child yield of 1FE per 500 dwellings.
- 1.12 In July 2013⁵ NHDC reduced the earlier wider land parcel and identified site GA2 for residential development.
- 1.13 The evidence indicates that NHDC failed to engage HCC constructively with HCC during the period 2012-2013 in either a discussion about the child yield requirement (1:500 ratio) or the requirement for the Great Ashby site to be allocated for a secondary school. It is noted that NHDC have not produced any minutes of meetings for that period and neither are these referred to in the DtC compliance statement.⁶
- 1.14 In November 2014⁷ a meeting was held at which HCC made clear the need for a secondary school in north-east Stevenage.

² Appendix one reference 10

³ Appendix one reference 35

⁴ Appendix one reference 33

⁵ Appendix one reference 32

⁶ NHDC DtC compliance statement (June 2017) page 28

⁷ Appendix one reference 31

- 1.15 In December 2014⁸ NHDC published the Preferred options Consultation (Regulation 18) in which the Great Ashby site was confirmed as a potential site allocation accommodating 500 dwellings and a primary school.
- 1.16 In response to the Regulation 18 Consultation HCC confirmed in a letter dated 6 February 2015⁹ the need for 1FE per 500 dwellings and the education need for a secondary school site allocation at GA2.
- 1.17 In response to the Regulation 18 consultation letter from HCC a meeting was held in February 2015¹⁰ seeking further clarification from HCC on its position in respect of their representations made in February 2015. HCC made the 1FE per 500 dwelling ratio clear and HCC confirmed that a school would be unaffordable due to residential development values attached to the land.
- 1.18 In May 2015 NHDC issued a call for sites and HCC again responded¹¹ reiterating the need for 1FE per 500 dwellings, reiterated the need for a secondary school site allocation at GA2 and confirmed the 6-8FE preference for secondary school size and this was reiterated in a letter to NHDC in December 2015.¹²
- 1.19 There were no further meetings between May the rest of that year. HCC contend that despite many requests NHDC failed to engage HCC constructively during the rest of 2015 about the Great Ashby site and pupil yields from proposed housing allocations.
- 1.20 In February 2016 NHDC agreed to meet HCC to discuss education requirements. At this point following a meeting NHDC¹³ set out a requirement for HCC to justify the child yield of 1FE per 500 dwellings and the justification for the selection of the Great Ashby site over other sites. These requests for more information were just under four years after HCC made their initial representations in November 2012. HCC contends that to wait for this period of time before questioning evidence does not represent constructive engagement in the preparation of effective strategic policies.
- 1.21 In a more constructive fashion, following the above NHDC requests, HCC confirmed its approach to child yield requirements as soon as possible in a response to NHDC in a countywide letter¹⁴ to all districts (including NHDC). They also advised that site search work had been commissioned from Vincent and Gorbng to identify an appropriate site for a secondary school. HCC would like to make it clear that NHDC did not offer to fund or assist in funding the not inconsiderable cost of the site search exercise which was at their request.
- 1.22 In June 2016¹⁵ HCC made it clear that there was a need for the Great Ashby site to be allocated (pending outcome of the refreshed site), reiterated the 6-8FE model of education provision and the 1FE per 500 dwellings ratio. In July 2016¹⁶ NHDC attended a meeting at V+G offices at which the results of the site search were presented indicating that the Great Ashby site was still the best location for a secondary school site to meet the education requirement. HCC indicated that the 4ha identified at the Great Ashby site for education provision should be extended to provide for a secondary school.

⁸ Appendix one reference 30

⁹ Appendix one reference 29

¹⁰ Appendix one reference 28

¹¹ Appendix one reference 27

¹² Appendix one reference 26

¹³ Appendix one reference 25

¹⁴ Appendix one reference 24

¹⁵ Appendix one reference 23

¹⁶ Appendix one reference 22

- 1.23 Following that meeting HCC requested a meeting to discuss education provision following NHDC Full Council approval.¹⁷
- 1.24 NHDC indicated in an email July 2016¹⁸ that they did not intend to alter the plan to take account of any additional requirement at the Great Ashby site and that existing processes should “run their course”. HCC contend that at this critical stage this NHDC did not engage constructively to resolve secondary education requirements.
- 1.25 HCC asked again in an email in August 2016¹⁹ for NHDC to consider extending the Great Ashby site to enable the full 6-8FE secondary school allocation to be made. HCC were advised by NHDC that if they wanted to discuss a potential education extension they should contact the landowner. NHDC did not offer to facilitate or support this discussion.²⁰ HCC contend that at this critical stage NHDC did not engage constructively or actively to resolve secondary education requirements.
- 1.26 HCC contacted the landowner (Keymer Cavendish) and in an email to NHDC in September 2016²¹ HCC advised that technical work by the landowner had demonstrated that additional education provision on the site could not be accommodated by the highway network in conjunction with the scale of residential development proposed. HCC requested an urgent view on how NHDC were going to address the education requirement.
- 1.27 In an email response on 28 September 2016²² NHDC indicated that the scope to make changes to the endorsed NHDC strategy is limited to finalisation of detailed wording. They refused to meet HCC in advance of the Reg 19 submission and advised that “existing processes should run their course”. In immediate response to that email HCC sent a letter²³ on 17 October 2016 reiterating the need for a 6FE secondary school at Great Ashby, reminding NHDC why the provision of two 4FE schools in Great Ashby and Knebworth was not acceptable, reminding NHDC that the allocation at Great Ashby was now no longer affordable.
- 1.28 In October 2016 the Local Plan Proposed Submission (Regulation 18) consultation is published. There are no changes to the plan as a result of HCC evidence (which had been requested by NHDC and supplied by HCC). The plan states that they will “continue to explore options” for secondary school provision. HCC consider that this was not a constructive response.
- 1.29 In November 2016²⁴ HCC issued a representation which reiterated all previously stated requirements and explained that NHDC had consistently refused to meet or facilitate a discussion with the landowner.

¹⁷ Appendix one reference 21

¹⁸ Appendix one reference 20

¹⁹ Appendix one reference 19

²⁰ Appendix one reference 18

²¹ Appendix one reference 17

²² Appendix one reference 16

²³ Appendix one reference 15

²⁴ Appendix one reference 13

- 1.30 In March 2017²⁵, with matters still unresolved and with NHDC failing to co-operate constructively, HCC sent a letter to NHDC reminding NHDC of the evidence submitted at the request of NHDC and requesting that a statement of common ground be prepared to support the potential search for an additional site which HCC had further commissioned since it was now apparent that the Great Ashby site could not be extended. HCC also requested that a site be identified ahead of plan submission. This request was to ensure NHDC were in compliance with the requirement in para 003 of PPG 6 March 2014 which requires “local planning authorities to make every effort to secure the necessary co-operation on strategic cross boundary matters before they submit their local plans for examination”.
- 1.31 A meeting with NHDC was also requested and took place on 4 April 2017. A meeting note²⁶ is supplied by NHDC in this respect. The meeting note suggests the Regeneris report was nearing completion but NHDC had only commissioned it at the end of March 2017.
- 1.32 In April 2017²⁷ with matters still unresolved NHDC wrote back to HCC indicating that they consider to have met DtC legal requirements. The letter also indicated that they had commissioned (at the end of March 2017) a company (Regeneris) to review potential future yields with regard to the 1:500 ratio.
- 1.33 HCC contend that NHDC were first advised of the 1:500 ratio in November 2012 yet it has taken NHDC five years to decide that the evidence presented (on several occasions) was not robust. HCC contend that this last minute notification (and last minute commission) at such a late stage in the plan preparation period (i.e. just before NHDC were due to resolve to submit the local plan for submission) is a significant failure to work constructively and actively in respect of this matter.
- 1.34 The Regeneris Report²⁸ was received by HCC in draft form on 19 April 2017. This report is not listed as part of the NHDC evidence base. A response²⁹ was issued by HCC to the report by HCC’s demographer on 26 June 2017 and set out again at a meeting on 14 September³⁰ 2017. No response was received from NHDC to this response.
- 1.35 HCC contend that NHDC have failed to proactively consider the HCC response. It has only just been confirmed (verbally in a meeting held on 16 October) by NHDC (following clarification by HCC) that the 1:500 ratio has now been accepted but has not been confirmed by NHDC in writing. HCC consider that NHDC have failed to work constructively and actively to consider the consequence of accepting this ratio in the period June 2017-October 2017. It is noted that during this period NHDC submitted their plan for examination with this principal education matter affecting potential school sites across the District unresolved. There was some attempt at a memorandum of understanding³¹ to which HCC responded in August 2017³² but no further response was received and the MoU draft remained incomplete. This is also noted in the NHDC DtC compliance statement.
- 1.36 In parallel with the discussions on pupil yield HCC was fulfilling its responsibilities to act constructively by commissioning further work on an additional 2 sites identified north of Stevenage which could potentially provide a suitable and deliverable site. It is to be noted that NHDC did not commission or support the cost of this work.

²⁵ Appendix one reference 12

²⁶ Appendix one reference 11

²⁷ Appendix one reference 10

²⁸ Appendix one reference 9

²⁹ Appendix one reference 7

³⁰ Appendix one reference 3

³¹ Appendix one reference 6

³² Appendix one reference 4

- 1.37 At a meeting on 24 April 2017³³ Vincent and Goring indicated that following transport assessments land adjacent to Back Lane had been identified as the preferred option. NHDC advised that this site had been rejected for housing as a consequence of Green Belt impacts. NHDC did agree to a site visit and with Stevenage Borough Council (SBC) officers this was arranged for 26 September 2017 when the landowner could attend.
- 1.38 A site assessment presentation was made by Vincent and Goring at a meeting held on 16 October 2017³⁴ attended by HCC, NHDC and SBC. SBC officers indicated that they would object to the Back Lane site being allocated and NHDC officers offered no comment on the suitability of the site. HCC once again reiterated the need and their position that a 4FE secondary school option on the Great Ashby site at 4FE was not acceptable.
- 1.39 On 12 October 2017³⁵ NHDC advised HCC that they have commissioned a company (PSE) to justify the 4FE model proposed by NHDC. HCC contend that NHDC were first advised of the 6-8FE preferred school size in May 2015³⁶ yet it has taken NHDC over 2 years to decide that this evidence is not robust. It is not clear when this work was commissioned although it is noted that the document is dated July-September 2017. The report was issued to HCC on 13 October 2017³⁷ and HCC have responded in their Matter 6 statement. HCC contend that this last minute notification (last minute commission and issue of evidence) at such a late stage in the plan preparation period (i.e. as the plan is before the Inspector for Examination) is a significant failure to work constructively and actively in respect of this matter.
- 1.40 In summary and conclusion HCC contend that in spite of presenting consistent information and additional explanations and evidence in response to all requests from NHDC, NHDC have not acted in a constructive and active fashion during the plan preparation period. During the early part of the plan period dialogue was limited and last minute commissions to challenge pupil yield and models of secondary provision are not considered by HCC to be constructive or timely since these issues have been the basis of HCC representations since November 2012. As a consequence of the failure to act constructively and actively, HCC respectfully conclude that the legislative Duty to Co-operate has not been fulfilled. As a consequence this has led to the lack of effective strategic policies in respect of secondary education and in particular has led to a failure to identify sufficient secondary school provision to the north of Stevenage such that the plan before the Examination-in-Public is now unsound.

³³ Appendix one reference 8

³⁴ Appendix one reference 1

³⁵ Appendix one reference 2

³⁶ Appendix one reference 27

³⁷ Appendix one reference 2

Appendix One: Summary note of meetings and correspondence held between NHDC and HCC 2012- 2017

Appendix One: Summary note of meetings and correspondence held between North Herts District Council and Hertfordshire County Council (based on information provided by Hertfordshire County Council to Vincent and Gorbing) 2012-2017

| Ref | Date | Correspondence type | Parties involved | Summary of matters | Additional supporting material |
|-----|-------------------|---------------------|---|--|-----------------------------------|
| 1 | 16 October 2017 | Meeting (NHDC) | NHDC/HCC SBC/ VG | <ol style="list-style-type: none"> HCC have not received any written confirmation from NHDC regarding the 1 form of entry: 500 dwellings ratio (1:500 ratio). HCC have not received any written response from NHDC to the comments made on the Regeneris report. HCC reiterated its position in respect of the potential land value which has been generated at GA2 and which makes the site unaffordable to the public purse and as should not have been identified in the local plan. NHDC did not issue any support for the Back Lane site assessment work presented at the meeting. SBC members did not support the Back Lane site allocation due to potential impacts on Forster Country. NHDC promoted a site allocation at GA2 for a new secondary school on a land parcel of 7ha despite 2. NHDC reiterated their position that a 4FE school site was sufficient for land north of Stevenage. NHDC were asked to justify the 4FE education need at the meeting but no response was forthcoming. No Memorandum of Understanding was agreed. No statement of common ground was agreed. HCC confirmed a commitment to providing information on the phased requirement of school places across the plan period in 5 yearly intervals. | Minutes of meeting Appendix 1a |
| 2 | 13 October 2017 | Email response | NHDC | <ol style="list-style-type: none"> NHDC issue a draft report prepared by PSE regarding the efficacy of 4FE education models and the suitability of sites identified by NHDC. The report was received late 13 October 2017. | Appendix 1b |
| 3 | 14 September 2017 | Meeting (NHDC) | NHDC/HCC | <ol style="list-style-type: none"> HCC set out again the response to the Regeneris Report. The Regeneris Report is not listed as part of the NHDC evidence base and is not issued in Final form. HCC response is not listed as part of the NHDC evidence base. HCC have not received any written response from NHDC to the comments made on the Regeneris report. | No minutes available |
| 4 | 25 August 2017 | Email response | HCC | <ol style="list-style-type: none"> HCC response to MoU draft and notes of meeting sent but responses never received. | Appendix 1c |
| 5 | July 2017 | Local Plan | NHDC | <ol style="list-style-type: none"> NHDC submit Local plan to Secretary of State. There is no modification to provide for a secondary school site to be allocated north of Stevenage. There is no supporting evidence that links housing delivery to school requirements (1:500 ratio). | - |
| 6 | 13 July 2017 | Meeting (NHDC) | NHDC/HCC | <ol style="list-style-type: none"> NHDC advised the local plan had been submitted. NHDC advised that a MoU could be prepared. | Appendix 1d |
| 7 | 26 June 2017 | Written response | HCC to NHDC | <ol style="list-style-type: none"> HCC respond to the Regeneris Report setting out a justification for the 1:500 ratio concluding that the Regeneris report does not fully consider the methods used by the County Council to assess development at the local plan and application stages with regard to school place planning and reaches conclusions that are not fully evidenced or explained. | Appendix 1e |
| 8 | 24 April 2017 | Meeting (V+G) | HCC/NHDC/ EHDC/Pigeon Investments/ SBC/WHBC/VG | <ol style="list-style-type: none"> VG advise that 2 additional sites north of Stevenage (Back Lane and Claypit Woods) had been the subject of Transport Assessments and the Back Lane site was identified as the preferred option. NHDC advised that the Back Lane site was rejected in the emerging local plan because of its Green Belt location, impact on Chesfield Park and the land promoted includes housing. NHDC asked for justification including evidence of need. NHDC stated that a 4FE site had been included at GA2 and they would need evidence of why this could not be delivered. HCC advised that the landowners of GA2 had produced separate TA's demonstrating that the site cannot accommodate all of the development proposed in the local plan policy (See Appendix in November 2016 reps) HCC requested co-operation from NHDC in the identification of a new school site in the GB north of Stevenage. NHDC advised the plan could be amended by the Inspector but evidence would be required regarding timing and deliverability and education need. NHDC were asked to provide information regarding need from HCC. Further feasibility work needed on Back Lane site. | Appendix 1f |
| 9 | 19 April 2017 | Report | NHDC to HCC | <ol style="list-style-type: none"> HCC receive draft Regeneris Report from NHDC. | Appendix 1g |
| 10 | 10 April 2017 | Letter | NHDC to HCC | <ol style="list-style-type: none"> HCC receive letter from NHDC which summarised states: Active and ongoing attempts have been made to effectively co-operate as the plan was developed demonstrating a willingness of both parties NHDC have commissioned work to review potential yields (the Regeneris report) | Appendix 1h |
| 11 | 4 April 2017 | Meeting | NHDC/HCC | <ol style="list-style-type: none"> NHDC advise Regeneris report has been commissioned. NHDC advise need for further work on potential site at Back Lane. | Appendix 1-11 |

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| 12 | 22 March 2017 | Letter | HCC to NHDC | <ol style="list-style-type: none"> HCC advise NHDC that the allocation of the site at GA2 for residential development and the failure to re-allocate this site for education use has led to a new site search to find a site that could meet the 6-8FE requirement. HCC advised that NHDC needed to work with HCC to find an alternative school site and allocate that site <u>ahead</u> of the plan submission. | Appendix 1i |
| 13 | November 2016 | Representation: HCC response to Reg. 19 Proposed Submission Local Plan | HCC | <ol style="list-style-type: none"> HCC objects to Policy SP18 as it is not considered to be sound. The allocation of 4ha of land for education is insufficient to serve the needs of the area. A 2FE primary school alone would require a minimum site area of 2ha. HCC consistently requested that it would be prudent to plan for a future secondary school in this area (6FE secondary and 2Fe primary) and as previously requested in the HCC representations to the Regulation 18 Local Plan preferred options in February 2015. The majority of the GA2 site has now been allocated for housing and is no longer affordable or deliverable for housing. | Appendix 1l |
| 14 | October 2016 | North Hertfordshire Proposed Submission Local Plan (Reg 19) | | <ol style="list-style-type: none"> GA2 is identified as a housing allocation (land off Mendip Way) for 600 homes. Policy SP18 identifies 4ha of land for education purposes including minimum provision of 2FE primary provision. NHDC indicate that they will “continue to explore options for secondary school provision potentially in the form of an all through school. | - |
| 15 | 17 October 2016 | Letter | HCC to NHDC | <ol style="list-style-type: none"> HCC reiterate the need for a 6FE secondary school at Great Ashby and request clarity from NHDC as to why they consider there is no requirement for a secondary school. HCC remind NHDC that the provision of secondary requirements cannot be met through two 4FE schools in Great Ashby and Knebworth reiterating advice given on 24 May 2016. HCC remind NHDC that Site GA2 is no longer affordable. HCC remind NHDC that there is a need for an 8FE secondary school site. | Appendix 1m |
| 16 | 28 September 2016 | Email response | NHDC to HCC | <ol style="list-style-type: none"> NHDC advise HCC that the scope to make changes to the endorsed strategy is limited to finalisation of detailed wording. NHDC refuse to meet in advance of Reg 19 submission. NHDC advice existing processes should run their course and if necessary a meeting can be convened following any reps HCC may make to HCC Reg 19 consultation. | Appendix 1n |
| 17 | 16 September 2016 | Email response | HCC to NHDC | <ol style="list-style-type: none"> HCC ask for an urgent meeting to discuss education provision. HCC advise that GA2 landowner has transport assessments to show additional education provision at GA2 is not achievable. | Appendix 1o |
| 18 | 18 August 2016 | Email response | NHDC to HCC | <ol style="list-style-type: none"> Concept schemes sent to HCC from NHDC. | Appendix 1p |
| 19 | 5 August 2016 | Email response | HCC to NHDC | <ol style="list-style-type: none"> HCC reminded NHDC that GA2 was identified following a site search as the preferred site for a 6-8FE secondary school and at a meeting on 15 July 2016 with NHDC this was put forward and agreed with Children’s Services present. | Appendix 1q |
| 20 | 28 July 2016 | Email response | NHDC to HCC | <ol style="list-style-type: none"> NHDC advise HCC that the scope to make changes to the endorsed strategy is limited to finalisation of detailed wording. NHDC refuse to meet in advance of Reg 19 submission. NHDC advice existing processes should run their course and if necessary a meeting can be convened following any reps HCC may make to HCC Reg 19 consultation. | Appendix 1r |
| 21 | 26 July 2016 | Email response | HCC to NHDC | <ol style="list-style-type: none"> HCC request a meeting to discuss education provision following NHDC Full Council approval. | Appendix 1s |
| 22 | 15 July 2016 | Meeting | V+G offices | <ol style="list-style-type: none"> V+G presented the results of the site search work which confirmed that GA2 was the best location for a 6-8FE secondary school. HCC requested NHDC support for a further allocation or extension to the 4FE allocation. | Appendix 1t |
| 23 | June 2016 | Representation: HCC response to local plan site testing | HCC to NHDC | <ol style="list-style-type: none"> HCC reiterate the need for a site allocation at GA2. Page 13 – HCC reiterate the 6-8FE model. Page 13 – HCC reiterate the 1:500 ratio and reasoning. | Appendix 1u |
| 24 | April 2016 | Letter | HCC to NHDC [sent to all Districts in Hertfordshire] | <ol style="list-style-type: none"> HCC reiterate the need for a 1:500 ratio and reasoning. | Appendix 1v |
| 25 | 11 February 2016 | Meeting email | NHDC to HCC HCC to NHDC | <ol style="list-style-type: none"> NHDC request justification of the 1:500 and reasoning. NHDC request further justification on site selection process. HCC send justification of the 1:500 reasoning and explanation. | Appendix 1w |
| 26 | December 2015 | HCC | HCC to NHDC | <ol style="list-style-type: none"> HCC reiterate the need for a 1:500 ratio and reasoning. HCC reiterate the need for education zone at GA2. | Appendix 1x |

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| | | Representation: HCC response to additional sites | | | |
| 27 | May 2015 | HCC Representation: HCC response to additional sites | HCC to NHDC | <ol style="list-style-type: none"> 1. HCC reiterate the need for a 1:500 ratio and reasoning. 2. HCC reiterate the education need for a secondary school site allocation at GA2. 3. HCC confirm 6-8FE model for education provision. | Appendix 1y |
| 28 | 12 February 2015 | Meeting HCC/NHDC | | <ol style="list-style-type: none"> 1. SBC confirm the 1:500 ratio (Nigel Smith) 2. HCC confirm GA2 unaffordable. | Appendix 1z |
| 29 | 6 February 2015 | HCC Representation: Letter – response to Local Plan Preferred Options Consultation Paper | HCC to NHDC | <ol style="list-style-type: none"> 1. HCC reiterate the need for a 1:500 ratio and reasoning. 2. HCC reiterate the education need for GA2 to be allocated for a secondary school site | Appendix 1ai |
| 30 | December 2014 | Local Plan 2011-2031 Preferred options Consultation Paper (Regulation 18) | NHDC | <ol style="list-style-type: none"> 1. GA2 is identified as a potential housing site accommodating 500 dwellings and a primary school | - |
| 31 | 28 November 2014 | Meeting | NHDC/HCC | <ol style="list-style-type: none"> 1. HCC reiterate the need GA2 to be allocated for a secondary school site and its previously confirmed use established through planning permission. | Appendix 1bi |
| 32 | July 2013 | Local Plan 2011-2031 Housing Additional Location Options Consultation Paper (Regulation 18) | NHDC | <ol style="list-style-type: none"> 2. The wider land parcel north of Stevenage is now reduced (site 226) and site GA2 is identified for residential development. | - |
| 33 | 28 March 2013 | HCC Representation: Letter – growth levels and directions | HCC to NHDC | <ol style="list-style-type: none"> 1. HCC reiterate the need for a 1:500 ratio and reasoning. 2. HCC set out the education need for GA2 to be allocated for a secondary school site and its previously confirmed use established through planning permission. | Appendix 1ci |
| 34 | February 2013 | Local Plan 2011-2031 Housing Options Growth Levels Consultation Paper (Regulation 18) | NHDC | <ol style="list-style-type: none"> 1. NHDC identify large parcel of land north east of Stevenage for housing development including schools. Reference is made to part of the site having previously been identified for a secondary school. | - |
| 35 | 19 November 2012 | HCC response to Emerging options consultation letter | HCC to NHDC | <ol style="list-style-type: none"> 1. HCC sets out infrastructure requirements based on a child yield of 1FE per 500-800 dwellings. 2. HCC sets out requirement for new secondary school north-east of Stevenage based on predicted housing numbers and clearly identifies site GA2 for this requirement having already obtained planning consent. | Appendix 1di |

Appendix Two: Evidence referred to in Appendix One

Appendix 1a

**HCC/NHDC/SBC Meeting
Monday 16 October 2017
Town Lodge, Letchworth GC**

Attendees

Alice Carrington – AC (HCC)
Andrea Gilmour – AG (HCC)
Dick Bowler – DB (HCC)
Ruth Gray – RG (Vincent and Gorbing)

Louise Symes – LS (NHDC)
Nigel Smith – NS (NHDC)
Caroline Danby – CD (SBC)

Note: The notes have been grouped under topic headings and may not be in the order discussed.

1. Local Plan update

NS provided an update on the NHDC Local Plan examination timetable. NHDC met with the Programme Officer last week who advised that the Inspector was considering moving the housing allocations due to be discussed in weeks 3 and 4 of the examination until 2018. NHDC was awaiting notification of the revised dates for the hearing sessions. NS advised that the weeks commencing 5 and 19 February were under discussion.

2. Matters 1 and 6

NS advised that NHDC are looking to group the housing delivery into 5 year phases – up to 2022/23; 2022/23 to 2027/28; and 2027/28 to the end of the plan period. This phasing would also apply to infrastructure delivery.

RG advised that she has not received a response from the Inspector to her letter.

3. Land at Back Lane

RG explained the plans that V&G have prepared for Land at Back Lane for use as a secondary school following the site visit on 26 September. The site being considered for the school has an area of 21.85 hectares.

The plans have been drawn up using information based on LIDAR data. Title information and other constraints are required.

We discussed in detail the potential 8fe secondary school site at Back Lane/Chesfield Park, identified as a result of the site search commissioned by HCC and undertaken by V&G. HCC Officers confirmed, based on the limited work completed to date, this site appears suitable, potentially deliverable and well located to meet the needs arising from the scale of housing growth proposed in the area.

It appears that the south eastern corner of the site lies within Stevenage Borough.

CD has discussed the site with SBC Members who were against any development on this land. NHDC officers did not offer or confirm a view as to whether they thought the site was suitable or potentially deliverable.

LS asked how much discussion had taken place with the landowner regarding the aspirational housing. RG advised that HCC were clear that their interest was only to achieve a secondary school site.

NS advised that NHDC looked at all of the land to the North of Stevenage, including this site, for housing and consulted with Historic England. The site is not in a conservation area and the house at Chesfield Park is not a listed building.

RG advised that a school would have a different impact upon the area to housing development.

There were discussions about where the site boundary would be for the school and the exceptional circumstances required to allocate a site in the Green Belt versus the very special circumstances needed to support a planning application for development in the Green Belt.

NHDC officers expressed concern about the slope of the site away from the flatter area that has been identified for the built area of the school.

4. Demand for Secondary School Places

AC/KM advised that the demand from the existing population in Stevenage for secondary school places is continuing to rise. Currently, with Barnwell expanding by +1 form of entry (FE) places will run out in 2021. With the existing growth in the community as well as pupil yield from new housing proposed by SBC within the Stevenage town boundary and housing proposed by NHDC around the edge of Stevenage additional secondary school places will be required. There are three options available to meet additional demand (and it is more than likely that all three options will be required to meet demand in the long term):

- a) Expand existing schools
- b) Provision of a new secondary school on the former Barnwell East site
- c) Provision of a new secondary school to the north of the town.

The housing trajectory is required from NHDC in order to determine the order in which the above options are implemented. NS has recently provided these to Sarah McLaughlin at HCC.

NS asked for the information on infrastructure to be provided in the five year phases given in 1 above.

5. Alternative Options to Land at Back Lane

NS asked HCC officers that if the Back Lane site is not acceptable what is the strategy for the provision of secondary school places?

KM advised that the demand arising from growth in Stevenage would be met through options 4a and 4b above, but provides insufficient capacity to meet the yield from new housing proposed by neighbouring authorities on the edge of Stevenage. This equates to a yield of just over 6FE. In light of over 9fe of current pupils who currently live north of Martins Way in St Nicholas and Great Ashby and, with the proposed housing to the north of the town which will increase pressure in this area further, the County Council has concluded a new 8FE school site to the north of the town would provide for an appropriate pattern of secondary provision to meet the local demand.

This has been reiterated to NHDC on previous occasions.

NS suggested that the options outlined in 4a and 4b above could be sufficient to meet the need arising over the next 10 years.

6. Site Acquisition

There was discussion around the process of acquiring a site for a secondary school.

HCC outlined their preference for the Back Land site to remain in the Green Belt but be allocated for education use to facilitate delivery of new school provision for the future.

DB advised NHDC of the technical process for establishing the alternative land use that is the basis for price for site acquisition (whether by agreement or by compulsory purchase process). Conversely, for the potential 8fe secondary school site at Back Lane/Chesfield Park, this is in the Green Belt, would attract an allocation for education use only, and the land price/compensation liability would be relatively low, and so development be economic and could be proven to be in the public interest which is an essential requirement to meet the CPO test

7. Sites GA2 (Great Ashby) and KB4 (Knebworth)

NHDC Officers confirmed they will continue to propose 2 x 4FE secondary sites; one located to the north as part of the GA2 development alongside a 2FE primary school, and one in Knebworth. NHDC officers did not, when asked, explain how they had arrived at this requirement.

NS advised that the landowner/promoter of site GA2 has identified additional land that could be made available for a 4FE secondary school.

HCC reiterated previous representations (made on many occasions), namely
(a) the demographic need for 8FE of secondary provision to serve the north of the town
(b) HCC would not support the establishment of 4FE secondary schools and for a host of educational and sustainability reasons, seeks larger schools
(c) A secondary school in a village location such as Knebworth is not considered sustainable. And our objection would therefore remain going into the EiP.

HCC further highlighted that the 4FE site NHDC is proposing to the north of Stevenage (at GA2) for both secondary provision and a 2FE primary school is both non-compliant in site size and unaffordable since it has a proposed residential allocation in the draft Plan and will therefore attract residential land values. As such it would not be deliverable.

8. PSE Consulting LTD Report

This report was provided to HCC on 13 October (pm).. AG asked about the status of the report and if NHDC Members had seen it. NS advised that it will be an evidence document for the EiP and that Members were aware of the report but had not had sight of it.

It was noted that there would not be an opportunity for HCC to respond to the document.

AG asked if the report had been discussed with landowners of the proposed 4FE secondary schools sites. NS said they were not aware of the report.

9. AOB

AG asked whether there was an update on any amendments to the Regeneris report following the meeting on 14 September.

NS and LS advised that NHDC now accepted the 1 FE:500 dwellings ratio for calculating pupil yield.

Appendix 1b



From: Andrea Gilmour
To: [Ruth Gray](#)
Subject: FW: North Herts - education study
Date: 18 October 2017 16:31:12
Attachments: [EDxx Education study - small sites and requirements.pdf](#)

Andrea Gilmour
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Tel: 01992 556477 **Comnet/Internal:** 26477

From: Nigel Smith [mailto:Nigel.Smith@north-herts.gov.uk]
Sent: 13 October 2017 15:03
To: Andrea Gilmour
Subject: North Herts - education study

Andrea,

As discussed yesterday, please see attached the work we have had completed looking at the efficacy of smaller school sites in relation to the current strategy in our Local Plan. We can discuss further on Monday. This has not yet been published or released as part of the Examination process so would be grateful if you could limit any circulation to attendees of our meeting.

Our IT systems were down all morning and only recently came back up so my apologies for this coming so late in the day.

Regards
Nigel

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A report for North Hertfordshire District Council
July-September 2017

Part 1: Practicalities of smaller secondary schools and all-through school provision
Part 2: Site area requirements for schools and consideration of allocated sites

Contact at PSE Consulting Limited: Bruce Austen
Contact at North Hertfordshire Nigel Smith

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PSE Consulting Limited is registered in England & Wales 6003371

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About PSE Consulting

PSE Consulting Limited was founded in 2007 by Bruce Austen and Karen Hardacre. The company specialises in consideration of current practice and provision in education, health and social care and the planning and provision of future services.

Bruce Austen has a background in school place planning, vision and design guidance for the development and delivery of education capital projects and programmes, and the development of strategies for social infrastructure in planned developments.

His career successes include leadership of the reorganisation of primary schools and the entire reorganisation of special education in Bath & North East Somerset. This included leadership of the development of the award-winning Three Ways School in Bath.

Bruce was a key member of the team that developed and created Futures for Somerset (the Building Schools for the Future programme in the County).

He led on social infrastructure for the development of Chapelton of Elsick, an entirely new town in Scotland, plus Grandhome, a major extension to the City of Aberdeen.

Amongst numerous other projects, Bruce has been Education Design Advisor for UTC Swindon, The Deanery CE School, also in Swindon, Winterbourne International Academy, St. Mary Redcliffe & Temple School and Cotham School (all Bristol). He also wrote the vision and accommodation schedule for Writhlington School.

Bruce wrote the Primary Capital Strategy for the London Borough of Islington.

He has also provided advice on many occasions to housing developers regarding contributions to social infrastructure and brokered agreements with local authorities to ensure proper and timely provision.

Most recently he has led major capital projects in schools in London developing creative solutions and delivering new buildings to accommodate major increases in student numbers on exceptionally challenging school sites.

Until 2015, Bruce was a Governor of two secondary schools and a junior school so is able to understand the needs of schools from the perspective of school leaders.

Executive Summary

North Hertfordshire District Council commissioned PSE Consulting to undertake two connected studies.

1. A review of any 'published evidence from respected sources relating to the efficacy of smaller-scale (4-5FE) versus larger (6+FE) secondary schools in terms of curriculum provision, educational outcomes, financial viability, deliverability and willingness of Academy Trusts to take on schools of different scales and formats, and any other relevant factors'
2. An assessment of the potential for delivering new school places on two allocated sites in the Local Plan. These sites are referred to in the plan as;

GA2 representing land off Mendip Way, Great Ashby

KB4 representing land east of Knebworth

It is the Council's intention that these sites could, with the use of adjoining Green Belt agricultural land for playing fields (both sites) and, at site KB4, some shared use of the adjoining Parish Recreation Ground, accommodate: (GA2) A 2FE Primary / 4FE secondary 'all through' school and (KB4) either a 4FE secondary school or a 2FE Primary / 4FE secondary 'all through' school

Part 1 of the report concludes that;

- There is no compelling evidence to show that secondary schools of 4FE or below cannot;
 - produce good educational outcomes,
 - provide a broad and balanced curriculum,
 - maintain themselves financially,
 - establish themselves as single-Academy Trusts or participate in Multi-Academy Trusts.
- Ofsted have made no definitive statement on the optimum size of secondary school in relation to levels of attainment or achievement.
- Ofsted inspections of a (time-limited) sample of smaller secondary schools report good or outstanding education provision and good or exemplary curriculum offers.
- C. 80% of smaller secondary schools (<630 students) are operating a balanced budget or a budget surplus
- Analysis of data shows that improved outcomes at GCSE and equivalents can be significantly above average at secondary schools within Multi-Academy Trusts with average KS4 cohort sizes of c. 120 students

Part 2 of the report concludes that;

- Relaxation of rigid adherence to Building Bulletin 103 area requirements is promoted by the DfE in the interests of promoting choice in state education. Combined with the absence of detailed guidance on site sizes for all-through schools, this provides Councils, proposers and developers with flexibility in considering new all-through provision.
- In addition to the flexibility encouraged by DfE and the limited information on site area requirements for all-through schools it is entirely possible to introduce greater areas of all-weather surface thus reducing site area requirements further.

- **Site KB4**

This is suitable in size for a stand-alone 4FE 11-16 secondary school and can also provide the minimum site area for an 11-18 secondary school.

Similarly the site could accommodate a 2FE primary school and 4FE secondary school on a minimum site area and at the mid-point of site area ranges.

Without site expansion KB4 cannot accommodate a 2FE primary and 4FE secondary with a post-16 provision.

Site expansion could potentially be achieved but this must be through absorption of existing public land into the site. Use of a site outside the control of a school is not recommended.

- **Site GA2**

This is suitable in size for a stand-alone 2FE primary school as set out in existing policy. The site can also accommodate a 4FE 11-16 secondary school but the gap between the site area requirement and the land available within the currently allocated site boundary is within a tight margin. The site cannot provide the mid-point site area for an 11-16 secondary school.

Inclusion of all-weather surfaces brings the site a size where it can accommodate an 11-16 school comfortably. However, it cannot provide a site for any other of the potential options without expansion of the site and this is a key consideration.

Expansion of the site appears possible to achieve.

Generally, each site offers potential for development of a school of one kind or another but only the reduction of site area requirements (through provision of all-weather surfaces) or an expansion of the sites allows development of wider options.

- Post-16 provision could be allowed for but there are significant doubts about the educational and financial viability of post-16 provision that relies almost entirely

on students of the new school staying on into post-16 education. If this becomes a critical issue, work should be commissioned from Hertfordshire Grid for Learning or another contractor to examine this issue in depth.

- Single-storey provision has some perceived advantages for primary-aged children but there is no clear evidence to support these perceptions. Many schools in England are >single-storey and, in addition to the reduction of footprint of buildings, there are also perceived advantages to learners and teachers of multi-storey provision.
- Shared facilities and common areas in co-located schools or all-through schools offer cost savings in buildings and maintenance and represent an effective use of space and funding. The extent of reductions in floor area and staffing costs will depend on the precise circumstances in which a school operates.
- All-weather surfaces offer options for a greater and wider range of use. The inclusion of all-weather surfaces reduces site area requirements. All-weather surfaces allow a school to generate income and to open itself up to the local community.
- A policy change should be made reflecting the fact that the indicated 4 ha. site at GA2 can only accommodate a 2 FE primary school. If there is a need for secondary provision at GA2 then the available site must be enlarged.

1 Aims

The report does not intend to set out advantages of smaller secondary schools but aims to assess whether there are educational, financial, social or organisational disadvantages of such schools.

Furthermore, the report does not set out to argue the merits of development at either KB4 or GA2. It simply assesses the practicality of school developments of various types at each site.

Comments regarding single-storey schools, all-weather pitches and all-through or co-located schools are derived from our experience in developing new school provision.

2 Background

In order to establish the background to a study focussed on school size it is necessary to examine the range of secondary school sizes in England. Wales and Scotland are not considered here as these countries have different educational systems and different curriculum offers from those in England.

School size in England

There are 3,408 state-funded secondary schools in England. The table below shows the composition of this figure and is drawn from the Statistical First Release January 2017 entitled "Schools, Pupils and their Characteristics: January 2017 - Local Authority Tables"¹

Table 1: Types of state-funded secondary school: January 2017

| Category | Number of institutions | NOR | Average NOR |
|------------------------------------|------------------------|----------------|-------------|
| LA maintained schools | | | |
| Comprehensive | 948 | 914,286 | 964 |
| Selective | 23 | 23,380 | 1,017 |
| Modern | 41 | 32,203 | 785 |
| Non-selective | 4 | 2,491 | 623 |
| Unknown | 64 | 26,739 | 418 |
| Total LA maintained schools | 1080 | 999,099 | 925 |
| Academies | 2090 | 2,146,929 | 1,027 |
| City Technology Colleges | 3 | 3,902 | 1,301 |
| Free Schools, UTC, Studio Schools | 235 | 73,159 | 311 |
| Total | 3408 | 3,223,089 | 946 |

As can be seen from Table 1, the mean average size for a state-funded secondary school in England is 946. This equates to just over 6FE. However, the figures are affected by the inclusion of University Technical Colleges, Studio Schools and Free Schools. This category of institutions is unusual as Studio Schools were typically

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/622372/SFR28-2017_LA_Tables.xlsx

developed for 300 students only, UTCs serve only the 14-19 sector and many Free Schools are in the early years of their development and so will not yet be at full capacity. Excluding these institutions leads to higher average numbers on roll of 992 which equates to 6.6 FE.

It should also be noted that, of the 3,408 institutions, 2090 are Academies which represents c. 69% of the total. Excluding the 238 Free Schools, UTCs and Studio Schools and the three City Technology Colleges brings this proportion to c. 66%

Analysis of the statistics shows that in only one Local Authority area is there an average size school (Academies and Maintained Schools) operating below 6FE. This is the Isles of Scilly which can be discounted as there is only one school in the Authority.

In reply to a 2013 Freedom of Information request regarding secondary school size the Department for Education (DfE) was able to respond on the basis of school census information from January 2012². At that date there were 3,268 state-funded mainstream secondary schools.

317 of these schools had between 1 and 500 students on roll representing 9.7% of all secondary schools. This demonstrates that a significant proportion of secondary schools can and do operate (at least in 2012) with far fewer students than the 6FE/900 students model.

3 Educational issues in smaller secondary schools

Above all other considerations of finance and organisation must come the educational experience and outcomes for students. In our searches of the Ofsted website and reading of inspection reports there is no evidence to suggest that smaller secondary schools are disproportionately represented amongst Grade 3 schools (requiring improvement) or Grade 4 schools (inadequate and/or requiring special measures). Some smaller secondary schools have received Grade 1 (Outstanding) judgements. This may not be because of the smaller size but clearly smaller numbers on roll do not appear to have a negative effect on educational outcomes or the judgement of Ofsted.

Furthermore, there is no evidence that smaller secondary schools are unable to offer a broad and balanced curriculum. Some schools of all sizes will make conscious decisions to limit the range of options available and/or promote a more academic path for students but the reasons for these decisions do not appear to be generally related to school size.

In 2002 the Local Government Association (LGA) commissioned research on the optimum size of schools. This was published by the National Foundation for Educational Research and the LGA under the title "The impact of school size and

² <https://www.gov.uk/government/publications/number-of-secondary-schools-and-their-size-in-student-numbers>

single-sex education on performance”³. The report states that “It would be possible to infer that...in order to maximise performance, comprehensive schools should be 6FE **and** single-sex (emphasis added). However, although medium-size schools obtained the best results on all GCSE outcomes, the differences (while statistically different) were very small”.

Despite this finding some Local Authorities adopted a model of 6FE/900 students as a minimum standard⁴. It can be inferred that financial, organisational or even property factors played a significant role in the adoption of this policy. Naturally this did not mean that schools with fewer than this claimed optimum number were closed or that schools were not opened with fewer than this number as the planned capacity.

In 2004, the Institute of Education published a report entitled “Secondary School Size: A Systematic Review”⁵. The review drew from banks of knowledge and research in 31 countries including England and looked at a period between 1990 and 2004. On this basis we can say that the review is one of the most comprehensive assessments of the effect of school size on outcomes and experiences. Whilst raising more questions and avoiding definitive statements the report states “The majority of ...studies do not report any statistically significant association between school size and achievement” although it is worthy of note that “There is a consistent relationship between student engagement and participation in school and school size; student engagement and participation was greater in smaller schools”. The report recognises the limitations of its remit and implies that school size is not the key factor in determining or promoting positive social, educational and economic outcomes. The authors state that the review seems to refute some of the more prevalent myths regarding the advantages and disadvantages of smaller and larger schools and notes that the relationship (between size and outcomes) is much more complex.

Given the apparent weight attached to school size in debates about school organisation it is significant that no major research appears to have taken place on the issue since the 2004 Institute of Education publication. We infer that other factors such as developing school leadership, curriculum changes, stronger teaching and changes to pedagogy have become more of a focus in the ongoing debate about improving student outcomes.

4 Financial issues in smaller secondary schools

In December 2016 the National Audit Office published a report entitled “Financial sustainability of schools”⁶. The report was initiated as part of the wide-ranging

³ <https://www.nfer.ac.uk/publications/91014/91014.pdf>

⁴ <http://news.bbc.co.uk/1/hi/education/8255341.stm>

⁵ http://eppi.ioe.ac.uk/cms/Portals/0/PDF%20reviews%20and%20summaries/s_s_rv1.pdf?ver=2006-03-02-125040-877

⁶ <https://www.nao.org.uk/wp-content/uploads/2016/12/Financial-sustainability-of-schools.pdf>

debate about future funding for schools and the impact of Government spending decisions.

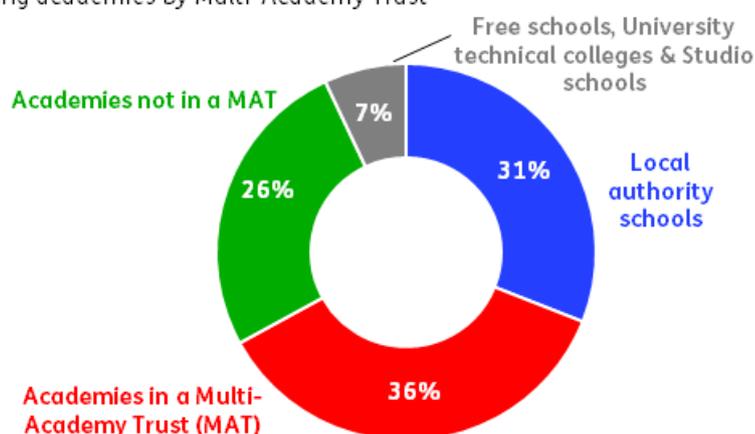
The report specifically considers school size and questions the viability of smaller secondary schools. The NAO state that small schools “are less likely to be able to benefit from economies of scale” and notes that, in 2014-15, 21% of secondary schools with fewer than 630 students were running a budget deficit compared to 9% of schools with more than 1,178 pupils. However, by definition this means that 79% of smaller schools are running a balanced or surplus budget. The factors that go toward a school facing exceptional financial pressures may be partly related to the school size but there is no compelling research evidence to support a conclusion that smaller schools are inherently financially unsustainable.

5 Academies and Free Schools

Academies are the principal organisational form of secondary school in England and Free Schools are an additional subset. Academies have been part of the educational landscape since 2000. A majority of secondary Academies are within a Multi-Academy Trust (MAT). Evidence included as background to the February 2017 Education Select Committee report stated that in March 2016 there were 973 MATs. Of these 252 were single-Academy Trusts and a total of 681 MATs operated three schools or fewer.

Types of secondary school in England

Including academies by Multi-Academy Trust



Source: Department for Education EduBase (May 2017) and 'Open academies and academy projects awaiting approval: March 2017'



There have been concerns over the willingness and capability of MATs to incorporate small schools. These concerns were focussed particularly on very small rural primary schools but drew attention to the issues surrounding smaller secondary schools too. The Select Committee noted “Certain areas of the country are struggling to attract new sponsors and small rural schools, largely in the primary sector, are at risk of becoming isolated. There is also growing concern for ‘untouchable’ schools which

Trusts refuse to take on. The Government should ensure that schools which are under-performing are not left behind by a programme which was originally designed to support such schools”

In itself, a MAT is no guarantor of good educational and financial performance. The Education Policy Institute’s (EPI) report “School performance in multi-academy trusts and local authorities–2015”⁷ states that “There are undoubtedly high-performing multi-academy trusts that are sustaining high rates of progress for their pupils [...] but the picture is far from consistent and joining a trust is not guaranteed to drive improvement.”.

Most MATs contain schools of different types and serving different age ranges. It is not uncommon for a MAT to operate a number of primary schools acting as ‘feeders’ to a single secondary school. In March 2016 c. 60% were operating schools across sectors.

The Free School Programme has also increased the number of institutions that operate on an ‘all-through’ basis where children join the school aged 3 and leave at 18⁸.

There are Academies operating with fewer or far fewer students on roll than the 6FE/900 student model. For the purpose of this report we looked for examples of Academies with fewer than 4FE/600 students on roll. We disregarded Academies that are defined as ‘Alternative Provision’, special schools, UTCs, Studio Schools and Free Schools.

In the time available we were able to identify some interesting examples of small or very small secondary schools which by the usual measures are providing effective, efficient education and serving a need in their communities.

6 Sample Schools

6a Fairfield School, Herefordshire

Fairfield is an 11-16 provision based in Peterchurch in Herefordshire⁹. The village is approximately 9 miles from the City of Hereford. Over the period 2006 to 2013 the School was inspected by Ofsted on three occasions. On each occasion the School has been rated as ‘Outstanding’. As of 2017, there are 478 students on roll.

Brief analysis of recent Ofsted reports¹⁰ shows that at various points, the school admitted a greater than average proportion of students with special educational needs. The 2006 Ofsted report states that “The curriculum is outstanding. In Years 7 to 9 it is broad and balanced, in Years 10 and 11 it is exemplary”. In 2013, this point is reiterated. Nowhere do Ofsted comment on the size of the school except as a

⁷ <https://epi.org.uk/wp-content/uploads/2016/07/school-performance-in-multi-academy-trusts.pdf>

⁸ <http://www.telegraph.co.uk/education/educationnews/10654655/Record-surge-in-the-number-of-all-through-schools.html>

⁹ <http://www.fairfield.hereford.sch.uk/>

¹⁰ <https://reports.ofsted.gov.uk/inspection-reports/find-inspection-report/provider/ELS/116944>

descriptor and the inspectors consistently attribute the success of the school to good leadership and high-quality teaching. The pupil-teacher ratio is almost precisely that found nationally.¹¹

The OFSTED inspectors report that Fairfield is a highly inclusive school. Fairfield generally admits new students from each of four primary schools in the areas. The five schools regularly meet and share ideas, working closely together from time to time on particular projects. In its 2009 OFSTED report Fairfield was particularly praised for those of its science lessons undertaken in classes of 60 showing an innovative use of space, staff and student time and flexibility of lesson organisation and course development. In 2012 Fairfield was part of a group of ten schools involved in a Department study of innovation in small secondary schools.

In summary, Fairfield is an example of a smaller secondary school developing innovative behaviours. These are clearly a necessity for such a small school but it is a further indicator that educational and social outcomes can be of the highest standard even in smaller schools.

6b St Mark's CE School, Bath and North East Somerset

St Mark's Church of England School¹² is an 11-18 school within the City of Bath and is one of the smallest secondary schools we identified. It is part of the Bath Education Trust, an organisation including mainstream secondary schools (including a Catholic school), a special school and a Studio School. In the period 2002 to 2015 the school has been inspected by Ofsted on five occasions¹³. It has always been an exceptionally small secondary with numbers rarely above 300. The school works in partnership with other Trust schools and post-16 students attend a joint provision at St Gregory's Catholic School in Bath.

The most recent Ofsted inspection in May 2015 noted;

- The proportion of disadvantaged students is above average
- The proportion of students with special educational needs is above average
- The proportion of students joining/leaving in-year is well above average
- The proportion of students eligible for Year 7 catch-up funding is above average
- Many students join the school with attainment below that expected for their age

The school was judged as Grade 2 (Good). At January 2017 there were 192 students on roll.

Ofsted reported that "The range of subjects in the school's curriculum is broad, flexible and responds to the interests and ambitions of all students"

St Mark's success is particularly worthy of note given the prior attainment of students, the numbers of students who are disadvantaged by economic circumstances or special educational need and high turnover of students. It

¹¹ <https://www.compare-school-performance.service.gov.uk/school/140868?tab=workforce-and-finance>

¹² <http://www.st-marks.org.uk/>

¹³ <https://reports.ofsted.gov.uk/inspection-reports/find-inspection-report/provider/ELS/109328>

demonstrates further that even a very small secondary school can provide a high-quality education where it is able to work in partnership with other schools.

6c The Sele School, Hertfordshire

The Sele School is in Hertford. Sele converted to Academy status in 2012 and the school was almost immediately inspected by Ofsted¹⁴.

The inspectors judged the school to be Grade 2 (Good). The report noted that school as being smaller but otherwise made no reference to the size of the school.

The report states that;

- Around 25% of students are eligible for pupil premium which is above average
- The % of students with statements of special educational needs is above average
- More students than average join the school at times other than in Year 7.

At that time the curriculum was described as having “..more than sufficient variety and depth to be attractive to students” and allow(ed) staff to teach imaginatively”

The most recent inspection was in March 2017. This was a short form inspection and judged that the school had retained its status as a ‘Good’ school

7 Secondary schools with features of a 4FE

We also analysed data regarding secondary schools with a cohort size of c. 120 within MATs¹⁵ (see tab ‘Improvement Measure KS4 2015’). This data is of value as, although the individual school may have a number on roll above 4FE/600 students, the cohort presented for exams is of the general size found in a 4FE secondary school. Even amongst some of the larger Academy Trusts, the KS4 cohort for 2015 was at or around 120. Examples are The Harris Federation, a longstanding Trust with 19 schools with ‘end of KS4’ students. In 2015, the average KS4 cohort size taking GCSEs or equivalents in a Harris Federation Academy was 121. DfE analysis shows that improvement in GCSE and GCSE and equivalents outcomes were ‘significantly above average’

A further example can be found with the ARK Schools Trust. This covers 17 Academies serving ‘end of KS4’ students and again shows outcomes on GCSE and equivalents as ‘significantly above average’. The average end of KS4 cohort size at ARK Schools was 105.

We do not attribute the improved performance to size of cohort. We simply recognise that large MATs are able to bring forward students in an average cohort size of c. 120 and demonstrate improved performance on GCSE and equivalent measures.

One further consideration following this analysis is the relative maturity and overall size of the MAT. A well-established MAT (such as Harris or Ark) will have developed

¹⁴ <https://reports.ofsted.gov.uk/inspection-reports/find-inspection-report/provider/ELS/138484>

¹⁵ <https://www.gov.uk/government/statistics/multi-academy-trust-performance-measures-2015-to-2016>

and refined its educational offer and curriculum delivery. Furthermore, a larger MAT will have achieved economies of scale which enable it to absorb smaller and/or underperforming schools.

8 Part 1 Conclusions

Ofsted have not concluded that smaller secondary schools provide a poorer-quality educational experience or produce worse levels of attainment and achievement as a result of their number on roll

The National Audit Office has recognised that 79% of secondary schools with fewer than 630 students operate a balanced budget or have a budget surplus

The Education Select Committee has not commented unfavourably regarding school size.

Multi-Academy Trusts do include smaller secondary schools within their remit.

Some Multi-Academy Trusts present KS4 cohorts for GCSE examination with c. 120 students.

No major research into the effect of school size has been undertaken in England over the last fifteen years and we argue that this is as a result of the inconclusive outcomes of that research and the development of competing and more fruitful ideas as to the reasons for success or underperformance of schools.

Part 2: Space requirements and options for new school provision

9 The Brief

PSE Consulting were asked to;

- carry out a review of school space standards as set out in BB103 to advise on the land requirements for the provision of a) a 4FE secondary school and b) a 2FE primary / 4FE secondary 'all-through' school. This is to include consideration of factors which may produce a range of site size requirements
- assess any ranges contained within the school space standards for different elements of provision
- consider the merits of the provision of single vs. two storey buildings
- consider the scope for shared facilities within all through schools – communal spaces, non-teaching areas etc.
- consider the provision of MUGA(s) vs. grass playing fields
N.B. Here we have included an assessment of all-weather surfaces and not simply MUGAs
- consider post-16 provision accounting for the fact that Hertfordshire County Council policy is that that secondary schools are inclusive of 6th form provision

Consideration of the above against the proposed secondary education strategy in the submitted North Hertfordshire Local Plan for two housing-led allocation sites: north-east of Great Ashby (Site GA2) and east of Knebworth (Site KB4) including:

- a. A high-level review of any relevant physical factors (e.g. topography of sites and relevant adjoining land) through desk-top analysis and / or site visit
- b. An indicative scheme submitted by landowners of site KB4 in response to the Local Plan consultation
- c. The current requirements for education provision as drafted in policy and / or suggested in the supporting text having regard to opportunities for the identified land requirements to be accommodated in part through: i. playing field provision beyond the allocation boundary in the Green Belt (site GA2 and site KB4); and / or ii. shared use of adjoining recreation ground facilities (KB4)

Conclusions and recommendations in relation to deliverability and/or any amendments required to the policy requirements currently included in the plan.

10 Background

The key document for considering the space requirements of schools is Building Bulletin 103: Area Guidelines for Mainstream Schools (BB103)^{16 17}. Crucially the associated guidance states that “...in line with policies which seek to increase choice and opportunity in state funded education, these guidelines will not necessarily have to be met in every case and should always be applied flexibly in light of the particular circumstances”.

Nevertheless, these standards should be the benchmark against which potential schemes are considered as they represent current good practice and the accumulation of design and space data from a vast range of projects.

11 Land requirements

BB103 contains a series of formulae regarding the site size required for a variety of schools.

Guidance states that, where an all through school of >750 on roll is being planned, then the sum of the building areas site for the component primary and secondary elements should be used. Naturally, a school serving such a wide age range will have some duplication of areas. Unnecessary duplication is discussed below. No statement is given regarding the overall site area in these circumstances. This provides proposers and developers with flexibility in considering new all-through provision. A starting point is to combine the site requirements for each ‘school’ of the planned size.

Appendix A includes the site area calculation for;

- A 2FE primary school (only to allow combined options to be developed)
- A 4FE secondary school
- A 4FE secondary school with a post-16 provision.
Post-16 numbers are calculated based on 90% of Y11 staying on into Y12 and 90% of Y12 staying on into Y13. See comments below in relation to the viability of a post-16 provision of this size.
- A combined 2FE primary/4FE secondary school
- A combined 2FE primary/4FE secondary school with post-16 provision

¹⁶<https://tinyurl.com/meawyvo>

¹⁷<https://tinyurl.com/y8ya9wh2>

N.B. No allowance has been made for either site to accommodate a daycare/nursery facility. If this were to be included in a developed option then location and precise area requirements would need to be considered against the impact on the overall site and buildings layout.

The formulae are set out in a headed column to show the basis of calculation

In judging the capacity of each of the proposed sites to accommodate each variant of school we have introduced a margin to allow for any unusable area. We argue that a site is acceptable for consideration against each option where the calculation shows there is headroom of 10% or more. These options are marked in green. Sites above the absolute minimum but with <10% lower headroom are marked as amber. All other options are marked as red.

We have calculated minimum site, maximum site and the mid-point for each formulae. It is unlikely that the maximum site area would be required but the mid-point or above is generally a reasonable option. Generally speaking, we make no comment on the maximum site option. The maximum site could be required if the school site were also planned to accommodate other social infrastructure (e.g. day care, healthcare, community facilities open during and outside school hours or where additional provision is required for learners with special educational needs).

In relation to sports and PE provision it must be noted that the School Premises Regulations 2012 stipulate only that “Suitable outdoor space must be provided in order to enable; a) physical education to be provided to pupils in accordance with the curriculum and b) pupils to play outside”.

DfE guidance states that the introduction of all-weather sports and PE pitches means that the area can count as twice the size. However, we have taken a cautious approach and allowed for the introduction of a single standard size football pitch. The other advantages of AWP as a resource are discussed elsewhere in this report.

12 The Sites

At GA2, we were asked to consider an indicative 4 ha. site (outlined in blue) within the proposed allocation (outlined in red) with various adjoining parcels of land within the site and extending into the Green Belt. These are outlined in orange and green.



Taking into account the area outlined in orange the site is equivalent in size to KB4 and, having visited both sites, this combined area appears to be a more suitable site than KB4. The site is almost level across large sections and this gives it a 'deliverability advantage' that may not be the case at KB4. However, this relies entirely upon including the additional land. Were it possible to include some or all of the 2 ha. site (outlined in green and) and/or the 2 ha. site outlined in orange then this location provides the greatest flexibility for considering future education provision.

At KB4, PSE were asked to consider representations submitted in response to the Local Plan showing a 5.7 ha. site adjoining a recreation ground. The Council report that any use of the recreation ground would be in addition to the 5.7 ha. site. However, the levels in this area appear more challenging thus giving rise to the 'deliverability advantage' discussed above. The configuration of the site would, in our opinion, also make a cohesive layout less easy to achieve. We strongly advise taking no account of the adjoining recreation ground. Safeguarding of young people cannot be assured where areas are also open to the public. Only areas that can be secured entirely should form part of a school site.



An indicative scheme for a school has been provided by the landowner and we comment on this below.

13 The Options

The 2FE Primary calculation

This is not an option in the strictest sense for the sites being considered in this report as it is not proposed as a stand-alone school. Calculations are only included in order to develop options for all-through schools or co-located schools.

The 4FE Secondary Option

N.B. Part 1 of this report shows that a 4FE secondary school is educationally and financially viable and that schools of this size represent a small but important fraction of all secondary schools in England.

Conclusions

KB4: A 4FE secondary can be accommodated at KB4. This leaves a comfortable margin in all scenarios. There is no requirement to introduce all-weather surfaces in order to make the school fit. Nor is there a requirement to increase the site area.

GA2: GA2 can also accommodate a 4FE secondary school but only at the minimum site area. At the mid-point the area required exceeds that available by 10%. Only by the introduction of all-weather surfaces can the area requirement be brought back below the site area and, at the mid-point, this leaves a shortfall of 6%. In order to create a comfortably sufficient area it would be necessary to include some of the adjoining land.

The 4FE Secondary with post-16 Option

Conclusions

KB4: The minimum site area can be achieved with a substantial margin. At the mid-point the site begins to become restricted but there remains a 3% margin. The introduction of all-weather surfaces makes the mid-point much more viable.

GA2: Even the introduction of all-weather surfaces fails to overcome the fundamental undersize of a 4ha site. Only introduction of wider areas of all-weather surfaces or an extension to the site through inclusion of adjoining land would allow this option to be pursued.

The 2FE Primary/4FE Secondary Option

Conclusions

KB4: This option could be accommodated but only the minimum area could be achieved. At the mid-point there is a shortfall of 8%. It is conceivable that a design could be developed that overcame this shortage.

GA2: Only introduction of wider areas of all-weather surfaces or an extension to the site through inclusion of adjoining land would allow this option to be pursued.

The 2FE Primary/4FE Secondary incl. Post-16 Option

Conclusions

KB4: The use of all-weather surfaces would probably allow this option to be accommodated at the minimum size although there is a 3% shortfall. The mid-point cannot be achieved without wider areas of all-weather surfaces.

GA2 The minimum site area cannot be achieved by a substantial margin on a 4ha. site. Only with a significant or very significant extension to the site could this option be pursued. However, were this extension possible then the site is equivalent to or greater in size than KB4. Extending the school site into the Green Belt allows the minimum area to be achieved with ease and the mid-point is achievable but with an 8% margin.

14 Post-16 provision

Hertfordshire County Council has a policy that secondary schools are inclusive of 6th form provision. However, in March 2016 the DfE published guidance aimed at Academies wishing to add post-16 provision to an existing school¹⁸. This does not match precisely the circumstances under discussion in this report but nevertheless acts a touchstone when considering absolute size of post-16 provision, the range of A Levels/Level 3 qualifications available to students and the effect on an overall school budget of a post-16 provision of c. 200 students.

The guidance implies a minimum student number of 200 is required to ensure breadth of the educational offer and a low or zero impact on the overall school budget.

Our calculations produce 204 students and this calculation is based on a 90% stay-on rate from Y11 to Y12 and 90% of the resulting Y12 staying on into Y13. In our opinion it is doubtful whether a 4FE secondary school could and would generate sufficient post-16 students without compromising the educational offer and/or requiring cross-subsidy from elsewhere in the school budget.

The offer made by other post-16 options in the area are outside the remit of this report. However, the DfE do emphasise the need for partnership across institutions, the prevention of unnecessary duplication of learning programmes and the importance of new provision having no negative impact on existing providers.

We recommend that, if this option is pursued, further research is commissioned from Hertfordshire Grid for Learning (HGfL) or another consultancy in order to test the educational and financial viability of a new post-16 provision at either KB4 or GA2.

Note: HGfL will have detailed knowledge of other providers in the area which may be harder for another consultancy to bring to the project

15 Single storey and two or more storey schools

Many primary schools throughout the UK are in buildings above a single storey. There are perceived advantages to single-storey and to multi-storey primary school buildings but there is no major research that shows educational or social benefits or disadvantages of either format. As such, decisions on the format of a school should be taken in light of planning policies, general aesthetic appeal and the larger footprint occupied by a single-storey school. This latter point has an effect on the capacity of a given site to accommodate a school.

Arguably, a single-storey building is less dominating for the youngest children and feels more of a welcoming environment at smaller-scale. Some argue that it creates

¹⁸ <https://tinyurl.com/zakyxhr>

a more 'domestic' feel for young children. Approximately 80% of the UK population live in houses rather than flats so obviously this is contrary to the actual home environments of most children.

Single-storey buildings do mean that all children have direct access to the outdoors and this can provide opportunities for outdoor learning and learning through play especially for those in the earlier years of their primary education.

A two-storey building or even three-storey building obviously occupies a smaller footprint so there are advantages where sites are small or constrained. This is particularly valuable in high-density urban locations but can also be valuable in suburban or rural areas where land may be difficult to obtain or where access is difficult from existing roads.

There are perceived benefits of multi-storey primary school buildings as they provide a sense of progression in education for children as they move between Year Groups and/or Key Stages. Moving up a year or Stage is mirrored by a physical move upward in the building.

Almost all secondary schools are two storeys or more. This is quite acceptable and often aids with the development of faculties/departments with a distinctive identity and ethos. It also offers a greater opportunity for the development of traditional or more creative adjacencies between curriculum areas.

In an 'all-through' setting thought should be given (with due consideration of planning issues and basic aesthetics) to placing a multi-storey secondary school above a single or two-storey primary school. This minimises land use further and adds to the sense of progression felt by learners as they move up the building. We recognise there are sensitivities regarding visual impact in rural edge areas such as those under discussion in this report and therefore planning policies would be paramount in considering the practicality of this. Nevertheless, there are no compelling reasons to avoid it on educational grounds providing the overall building promotes connectivity between curriculum areas and students.

We recommend that any feasibility studies or design development on either KB4 or GA2 assumes >single-storey primary and secondary provision.

We recommend that any feasibility studies or design development on either KB4 or GA2 consider the practicality of secondary provision being directly above primary provision.

16 Shared facilities within all through or co-located schools

It is entirely acceptable for there to be two or more schools within one building or occupying a single site. These are known as co-located schools and offer some of the benefits of an all through school in terms of shared resources and efficient use of land. Generally speaking co-location allows and encourages the sharing of car

parking areas, access to the schools, and can also support a shared Reception area and administration offices. Co-located schools will often appoint a single Site Services Manager and Site Services Team, thus reducing overall staffing costs through avoiding duplication of these roles. This has no direct impact on the educational offer made by a school but frees up funds for learning and teaching.

However, where two schools occupy the same building and site it is sensible to consider the potential of an all-age school. As stated above in relation to co-located schools, greater cost effectiveness can be achieved through the appointment of administrative and support staff who serve a single school at a lower cost than the equivalent roles for two separate schools. It can also promote economies of scale in terms of catering, repairs and maintenance. Crucially, it can promote the appointment of teaching and support staff to work across phases allowing professionals to share expertise with a wider number of colleagues.

In a situation where recruitment of Headteachers and school leaders is proving more challenging, and where it is becoming more common for Headteachers (via Multi-Academy Trusts) to act as Executive Principals, an all age school is able to offer a greater challenge, a greater opportunity to improve educational and social outcomes and (usually) a higher salary.

An all-age school will also offer primary-aged children planned access to specialist facilities that are almost always absent from primary schools and is likely to have a much greater range of potential options for community use (adult learning, sports, leisure facilities). Finally, an all-age school can promote formal or informal mentoring by older students of younger learners, allowing them to act as role models with a consequent impact on their own behaviours.

On the basis of the above, where land is available for the development of an all-age school, there are compelling educational and financial reasons to consider the provision of this type of joined provision.

17 All-weather surfaces and grass playing fields

Grass playing fields offer a unique experience for young people and opportunities to compete, play and socialise on grass are to be welcomed. However, it is inevitable that grassed areas become difficult or impossible to use in either very hot and dry conditions (where the surface will become uneven and potentially hazardous to play on) or where there has been heavy rain (where the surface will become muddy and inhibit normal competition or recreation). Furthermore, grass pitches in schools are only assumed to be of a standard that supports seven hours usage a week¹⁹. Given the large area that grass playing fields occupy on any school site it is reasonable to argue that a significant minority or even majority of sports and PE provision should be of a higher standard and available for use for a greater period of time each week. Ideally a school would have both options available for use as a games/sports area. In

¹⁹ <https://tinyurl.com/jqxm19>

any event, all schools should have some grassed area for play and socialising but this does not necessarily have to be the principal games/sports area.

Where sites are constrained the introduction of an all-weather surface means that people can, in almost all conditions, have access to the PE curriculum and participate in beneficial physical activities. This is acknowledged in BB103 and in guidance from Sport England. “The area of all-weather pitches can be counted twice for the purposes...as they can be used for significantly more than the seven hours a week assumed of grass pitches²⁰.” The fact that the area can be used at almost all times means that the requirement for very large areas of grassed playing fields is reduced.

The inclusion of an all-weather surface for organised and informal games and sport has three principal beneficial effects. Suitably marked, a pitch of this size can make provision for a wide variety of sports and games and, if an all-through school is being considered, is suitable for use by all age groups. Furthermore, as the area can be used heavily, it offers the potential for hire to local sports clubs and for less formal sports and recreation. This creates an income stream for the school.

By themselves, these two benefits are sufficient advocates for the inclusion of all-weather surfaces. As such, all-weather surfaces should not be regarded as an unfortunate necessity at a school site but a major improvement on the traditional grassed pitches.

The third and wider effect is that it ensures that local people are able to benefit from the facilities of a major public building in their community.

18 The strategy

Policy SP10 of the Local Plan Submission sets out the Council’s aim of maintaining and creating ‘healthy communities’. This specifically refers to the making of new education provision in appropriate and accessible locations. Reference is also made to community, cultural, leisure, sport and recreation facilities and a school is ideally placed to offer a contribution to meeting all of those needs. Therefore, consideration of sites KB4 and GA2 is entirely consistent with the policy framework.

A smaller secondary school alongside a primary school offers the greatest chance of meeting the expectations set out in the policy. For the reasons set out above there are good educational, financial and social reasons for making this a joint provision in the form of an all-through school. There is also a strong case for saying that an all through school represents a good use of land (a finite resource) and is in keeping with general and specific environmental good practice.

We recommend that the Council commit itself to participation in a feasibility study at the appropriate time for an all through school on KB4 taking into account the potential for extending the site.

²⁰<https://tinyurl.com/y7zqjpyf> (page 39)

We recommend that the Council makes a judgement regarding a site extension at GA2. Subject to confidence about a site extension, a similar commitment to participation in a feasibility study should be made for GA2.

Topography of sites and relevant adjoining land

We have visited both sites in order to establish a clear understanding of the qualities and disadvantages of each site. GA2 is relatively flat and in itself this makes it a more viable and cost effective option. Furthermore, from the marked up aerial photograph and the evidence of the site visit, it would be technically and physically possible to expand the 2 ha. site outlined in orange and all or part of the adjacent 2 ha. site in the Green Belt. If all of these areas could be absorbed into the school site entirely then this makes GA2 an even more attractive option.

As stated above KB4 could offer an extensive site option. However, topography and levels on the current site and layout are probably more challenging and the benefits attributed to the use of the adjoining recreation ground cannot be realised.

19 The indicative scheme

The proposal put forward by the landowners is insufficiently detailed for a full appraisal.

Early comments are that the school should not 'turn its back' on the community it intends to serve. Ideally the building should have an equal face and offer a unifying presence for existing and future residents.

It is unclear whether the building is to provide for secondary students only or represents an 'all-through' option.

No building area is given so it is impossible to say whether the proposed form has sufficient floor area to comply with the guidance in BB103.

No Schedule of Accommodation has been produced so it is impossible to judge whether the right combination of spaces can be provided nor, in the absence of confirmation that this is an all-through school, is it possible to judge the potential for shared areas and more efficient use of internal and external space.

The position of the building on the site should take account of the necessity of opening the site and building after school hours and during weekends and holidays. A twin access will be required in any event.

Consideration should be given to the orientation of the building in order to prevent solar glare.

We recommend that, if this option is pursued, further design options are developed involving an architect with specialist expertise in the design of schools.

20 Use of recreation ground / Green Belt

We consider these two points together as there are common themes. We consider the use of open space which is outside the control of a school and accessible partially or entirely to the general public to be unacceptable on grounds of safeguarding.

At KB4 use of a recreation ground would mean that children would be playing in an area that could not be maintained with complete assurance of safety. Litter of various kinds could accumulate, there may be broken glass on the site and the walking of dogs on the area creates actual hazards. Unless an area of the Recreation Ground could be absorbed into the school site or be made physically secure and exclusively for the use of the school we would not recommend considering the use of this area when assessing viability of options.

At both sites, if land in the Green Belt can be secured legally and physically for an exclusive use for school playing fields then this would become acceptable.

We recommend that any area available for unplanned or uncontrolled public use be excluded from consideration.

21 Conclusions, recommendations and amendments to policy.

Our approach has allowed a margin of -5% to +10% in order to allow for particular topography, unusable areas, site shape, access issues, levels (even a slight slope can be problematic) and any site features that have to be retained (ponds, trees, ancient hedges etc.). Any or all of these issues may be present on the existing KB4 site or the potentially expanded site at GA2. Only full feasibility studies will determine whether our margins are insufficient, suitable or generous.

On balance, having visited the sites the GA2 site represents an opportunity to extend into adjoining areas in order to create a school site of the right size for all options under discussion. We recognise that this would mean a major additional inclusion of land and have no comment on the potential for success against that objective. Recognising that further intrusions in to the Green Belt will be the subject of debate in the future, GA2 also allows room for expansion of a school. On this basis, the site is more 'future-friendly' than KB4

KB4 represents an opportunity but prevents free consideration of all options due to the probable difficulty of absorbing areas of the recreation ground into the school site. This site can only be considered if there is no post-16 provision on site. It also means there is almost zero prospect of expanding the primary or secondary school at any point in the future. This should be a key consideration.

We recommend no change to Policy SP10

We recommend a change to Policy SP18 (c) which should recognise that, whilst the 4 ha. site provides (more than) sufficient land for a 2FE primary school, any co-location or all-through school would need an extended allocation. The policy should seek to allow for all options to be considered in partnership with the Local Education Authority and landowners. The current wording implies that secondary provision could be made within the current allocation in addition to meeting the need for primary places

We recommend that the Council consider the present allocations at KB4 and GA2 with a view to the probable expansion of the school(s) at a later date.

Glossary and terminology

Like every discipline and profession the educational landscape has its own terminology. This report is focussed on school size and school size can be referred to in a variety of ways.

AWP (All-weather pitches)

A manufactured 'grass' or rubberised surfaces able to be used for organised games and sports. The effect of including all-weather surfaces on a school site, in terms of a reduction in site requirements and wider value, is discussed below

Forms of Entry (FE)

The report makes reference to schools by forms of entry. A form of entry is generally defined as 30 students. This is a common reference point for all school place planning in England. Where a school operates a post-16 provision (commonly referred to as 6th Form) this does not feature in the FE calculation.

MUGA (Multi-use games area)

This is usually a hard-surfaced area marked out to allow a variety of organised games and sports. In most schools this acts as a play/social area at breaks as well as a timetabled space for PE. It may also be an all-weather pitch (see below)

Numbers on roll (NOR)

The number on roll (NOR) refers to the numbers of learners attending a given school at a given time.

For clarity, for secondary schools, this means;

4FE - comprising $(4 \times 30) \times 5$ Year Groups = 600 NOR

5FE - comprising $(5 \times 30) \times 5$ Year Groups = 750 NOR

6FE - comprising $(6 \times 30) \times 5$ Year Groups = 900 NOR

8FE - comprising $(8 \times 30) \times 5$ Year Groups = 1200 NOR

For primary schools the number of children per form of entry is also 30 but, there are seven Year Groups;

1FE – comprising $1 \times 30 \times 7$ Year Groups = 210 NOR

2FE – comprising $2 \times 30 \times 7$ Year Groups = 420 NOR

In the 'all-through' scenario discussed above and below this would mean an 'all-through' school for 1020 young people. No provision has been made for on-site early years provision. In this report inevitably we refer only to the planned number on learners expected at a school

Planned capacity and Net Capacity

Net Capacity is used to assess the total places available in a school. This is a methodology developed by the Department for Education.

Stay-on rate

This refers to the numbers of Year 11 students remaining in a school to begin A Level or other Level 3 qualifications in Year 12 and the proportion of students moving to Year 13 from Year 12.

Appendix A

| Site Area Calculation | | | KB4 Site Area | GA2 Site Area | Area required (after reduction for 1 x football AWP) | KB4 Site Area | GA2 Site Area | GA2 Site Area | GA2 Site Area |
|-----------------------|----------|---------------------------|---------------------|---------------------------------------|--|---------------------|---------------------------------------|--|---|
| | | | 57000 | 40000 | | 57000 | 40000 | 80000 | 80000 |
| Option and site areas | Formulae | Learner numbers and areas | Source: Nigel Smith | Source: Aerial Photograph (marked up) | Source: Sport England September 2015. Adult football pitch is 64 x 100 | Source: Nigel Smith | Source: Aerial Photograph (marked up) | Includes orange outline and adjoining Green Belt | Reduction for AWP. Includes orange outline and adjoining Green Belt |

| 2FE Primary | | | | | | | | | |
|-------------------|-------------------|-------|--|--|-----|--|--|--|--|
| | | 420 | | | | | | | |
| Minimum site area | 33.3 x NOR + 2000 | 15986 | | | N/A | | | | |
| Maximum site area | 42 x NOR + 2400 | 20040 | | | N/A | | | | |
| Mid point | | 18013 | | | N/A | | | | |

| | | | | | | | | | |
|-------------------|----------|------|--|--|---|--|--|--|--|
| Soft PE component | 20 x NOR | 8400 | | | 0 | | | | |
|-------------------|----------|------|--|--|---|--|--|--|--|

| 4FE Secondary | | | | | | | | | |
|-------------------|------------------|-------|-----|------|-------|-----|-----|-----|-----|
| | | 600 | | | | | | | |
| Minimum site area | 50 x NOR + 9000 | 39000 | 32% | 3% | 32600 | 43% | 19% | 51% | 59% |
| Maximum site area | 63 x NOR + 11000 | 48800 | 14% | -22% | 42400 | 26% | -6% | 39% | 47% |
| Mid point | | 43900 | 23% | -10% | 37500 | 34% | 6% | 45% | 53% |

| | | | | | | | | | |
|-------------------|-----------------|-------|--|--|-------|--|--|--|--|
| Soft PE component | 35 x NOR + 6000 | 27000 | | | 20600 | | | | |
|-------------------|-----------------|-------|--|--|-------|--|--|--|--|

| 4FE Secondary and post-16 | | | | | | | | | |
|---------------------------|------------------|-------|-----|------|-------|-----|------|-----|-----|
| | | 804 | | | | | | | |
| Minimum site area | 50 x NOR + 9000 | 49200 | 16% | -23% | 42800 | 25% | -7% | 39% | 47% |
| Maximum site area | 63 x NOR + 11000 | 61652 | -8% | -54% | 55252 | 3% | -38% | 23% | 31% |
| Mid point | | 55426 | 3% | -39% | 49026 | 14% | -23% | 31% | 39% |

| | | | | | | | | | |
|-------------------|-----------------|-------|--|--|-------|--|--|--|--|
| Soft PE component | 35 x NOR + 6000 | 34140 | | | 27740 | | | | |
|-------------------|-----------------|-------|--|--|-------|--|--|--|--|

Combined Options

| 2FE Primary/4FE Secondary | | | | | | | | | |
|-----------------------------|--|-------|------|------|-------|-----|------|-----|-----|
| | | 1020 | | | | | | | |
| Minimum Site Areas Combined | | 54986 | 4% | -27% | 48586 | 17% | -21% | 31% | 39% |
| Maximum Site Areas Combined | | 68840 | -17% | -42% | 62440 | -9% | -56% | 14% | 22% |
| Mid point | | 61913 | -8% | -35% | 55513 | 3% | -39% | 23% | 31% |

| | | | | | | | | | |
|------------------|--|-------|--|--|-------|--|--|--|--|
| Soft PE Combined | | 35400 | | | 29000 | | | | |
|------------------|--|-------|--|--|-------|--|--|--|--|

| 2FE Primary/4FE Secondary incl. post-16 | | | | | | | | | |
|---|--|-------|------|------|-------|------|------|-----|-----|
| | | 1224 | | | | | | | |
| Minimum Site Areas Combined | | 65186 | -13% | -39% | 58786 | -3% | -32% | 19% | 27% |
| Maximum Site Areas Combined | | 81692 | -30% | -51% | 75292 | -24% | -47% | -2% | 6% |
| Mid point | | 73439 | -22% | -46% | 67039 | -15% | -40% | 8% | 16% |

| | | | | | | | | | |
|------------------|--|-------|--|--|-------|--|--|--|--|
| Soft PE Combined | | 42540 | | | 36140 | | | | |
|------------------|--|-------|--|--|-------|--|--|--|--|

Early Years

| | | |
|---------------------------------|--|-----|
| Based on Schedule for 56 places | | 921 |
|---------------------------------|--|-----|

Appendix 1c

From: Andrea Gilmour
To: ["Nigel Smith"; Alice Carrington](#)
Cc: ["Louise Symes"](#)
Subject: RE: Meeting notes etc
Attachments: [170720 HCC NHDC MoU 1st Draft AG comments.docx](#)
[170713 HCC NHDC meeting notes HCC comments.docx](#)

Hi Nigel

I attach annotations to the notes following our meeting and some comments on the draft MoU. If it would be useful to have another meeting or you need any clarification on the HCC comments please let me know.

Thank you
Andrea

Andrea Gilmour
Interim Head of Development Services
Property, Resources
Postal Point CHO313
Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN
Tel: 01992 556477 **Comnet/Internal:** 26477

From: Andrea Gilmour
Sent: 02 August 2017 10:45
To: 'Nigel Smith'; Alice Carrington
Cc: Louise Symes
Subject: RE: Meeting notes etc

Hi Nigel
Please see my comments below.
Thanks
Andrea

Andrea Gilmour
Principal Planning Officer, Development Services
Property, Resources
Postal Point CHO313
Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN
Tel: 01992 556477 **Comnet/Internal:** 26477

From: Nigel Smith [<mailto:Nigel.Smith@north-herts.gov.uk>]
Sent: 01 August 2017 14:32
To: Andrea Gilmour; Alice Carrington
Cc: Louise Symes
Subject: Meeting notes etc

Hi Andrea / Alice,

Thanks for your time the other week, it was really helpful on a number of issues. To catch up on that and various recent emails...

Meeting notes

Draft notes from our meeting on July 13th attached. If you could review against your own

notes and let us know of any omissions or corrections. [I will get back to you early next week.](#)

Memorandum of Understanding / potential changes to the plan

Based on the above, I've attached a first draft Memorandum of Understanding (MoU). For the moment, it covers those areas we discussed at the meeting and where we can hopefully agree. If you could let us know if you are content with this version of the MoU and the suggested changes to the plan ~ or any alterations you'd like us to consider ~ that gives us a starting point. [I will get back to you early next week.](#)

We see this as an iterative process and if we can agree a 'draft 1' we'll then add to it as we go along (e.g.) once we have further info on any capacity at the Letchworth secondary schools etc.

Site visit to Back Lane

I'm free for both of the dates / times suggested. Louise would be free from around 2:30pm on September 5th and first thing on September 6th ~ she has another meeting back in Letchworth at 11 ~ if we could meet early at 9 / 930? [I am seeking alternative dates as it appears that the landowner is no longer available on these dates.](#)

Meeting with Regeneris

We've been in touch with Regeneris regarding the proposed meeting on September 8th. Their consultants work part-time hours and are unfortunately not available on Fridays so we would need to re-arrange. Could you provisionally advise of availability of the relevant officers at your end for 11am on any of Tuesday 12th, Wednesday 13th or Thursday 14th September (and similarly for the same days and times following week if none of those work)? [Our consultant only works Thursdays and Fridays so I have moved the meeting to 14 September.](#) [Could you advise on the location of the meeting?](#)

Regards
Nigel

Nigel Smith
Principal Strategic Planning Officer
Direct Dial: 01462 474847
North Hertfordshire District Council
Council Offices, Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

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**HCC / NHDC Meeting
Thursday 13 July 2017
Town Lodge, Letchworth GC**

Alice Carrington – AC (HCC)
Andrea Gilmour – AG (HCC)
Louise Symes – LS (NHDC)
Nigel Smith – NS (NHDC)

The notes below are structured as per the agenda / discussion points circulated prior to the meeting. These matters were not necessarily discussed chronologically.

1. Local Plan update

NS provided an update on the NHDC Local Plan which had been submitted for examination. Simon Berkeley had been appointed as Inspector. NHDC was awaiting notification of dates for any hearing sessions.

2. Memorandum of Understanding (MoU)

NS outlined NHDC's intention to agree a MoU with HCC. NS considered that, notwithstanding HCC's objections to the plan, there were a number of areas where the Councils are not in disagreement or where the objections could be overcome through the meeting and subsequent correspondence and that these should form the basis of a first draft. AC and AG were agreeable to this.

3. Areas of (broad) agreement / no objection

NS identified a number of areas of the plan where he considered that NHDC / HCC were in agreement or were not subject to objection (**Note:** These are as listed in the 1st draft of the MoU attached). AC provided additional information on a number of these sites and locations:

Barkway and **Barley** schools are to formally federate. Both are small schools. There is currently shared teaching across both schools with children travelling from one to the other on certain days.

The issue of the 'trigger point' at which the existing reserve school site in Barkway might be needed was discussed. NS advised that a planning application had been received on part of the BK3 site but had subsequently been withdrawn. A comprehensive and coordinated approach was required across the whole of this site and the adjoining school site to deliver the best solution in consultation with the existing schools. AC to discuss with the school(s).

Update since meeting: Barkway and Barley schools have now federated and are looking at options about how they organise. The reserve school site needs to be retained to ensure flexibility to the schools when they need it. There are currently no proposals to expand capacity in the Royston villages.

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Options for primary provision at **Knebworth** were discussed. Site KB2 includes a requirement for a 1FE school. NS suggested this was most likely to be achievable on the land to the south of Gypsy Lane which was flatter. A new school on the west of Knebworth would provide a better (geographical) balance of provision and would be advantageous in regards to highways and sustainable transport. AC advised this needs to be considered against HCC preference for 2FE schools and the viability of single form of entry. The possibility of expanding the existing school to 3FE within the parameters of KB4 was discussed, although this would leave result in all provision in one location. The school Governors and the Parish Council are keen to understand the position.

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4. Baldock (secondary education)

There was discussion around latest indicative masterplan produced for the public exhibitions which has 'moved' the secondary school site to south of allocation when compared to earlier illustrations, prior to pre-submission. NS suggested that, subject to provision of appropriate access between the site and Clothall Common, NHDC could be minded to suggest changes to the plan to address HCC's objections.

AG clarified that demand from the sites at the south of the town could be accommodated at Knights Templar and Hartsfield Schools in the event that BA1 doesn't come forward.

It was agreed that NHDC would draft potential changes to the policy and provide to HCC for comment. **Note:** These are appended to draft MoU which is attached.

5. Letchworth (primary education)

NS explained the rationale for approach in the plan and desire to avoid 'unintended consequences' in terms of school intakes-admissions and travel patterns. There was no intention by either NHDC or the landowner to resist on-site provision. AG advised HCC still wished to see this requirement included within the policy more explicitly citing the potential sale of land to an alternative landowner as an example of where tighter policy would be advantageous. AC advised four potential primary school sites within LG1 have been looked at in consultation with the Heritage Foundation.

It was agreed that NHDC would draft potential changes to the policy picking up on the matters discussed and provide to HCC for comment. **Note:** These are appended to draft MoU which is attached.

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LS explained that NHDC understood the rationale for the HCC objections regarding secondary education provision at Luton – arising from forecast deficits in Hitchin - but that

NHDC consider this site is less suitable to make provision for the rural villages in the west of the District due to the nature of the road network. Access into the rear of the east of Luton site includes single track roads.

Although further from some villages in terms of distance, the radial routes to / from Hitchin are much more suitable – mainly B roads or standard width carriageways. Due to its proximity, Breachwood Green may be more suited for having secondary demand met at east of Luton. AC confirmed that, although in [the Welwyn education planning area](#), [some](#) secondary demand from Codicote is [towards-met in](#) Hitchin.

Other factors leading to the forecast shortfall in Hitchin were discussed including inflows of [secondary school pupils](#) from Letchworth and [the](#) possibility of accommodating (some) demand from [the proposed](#) development [at](#) east of Hitchin [within](#) Letchworth.

AC advised that Hitchin Boys & Girls schools have changed their admissions rules to cap [intake-admissions](#) from Letchworth ([effective from 2018](#)). There are active proposals to expand both of these schools [from 2018](#). AG advised that, although [there is](#) 3FE expansion potential identified at The Priory, this was now an academy. AG confirmed that all HCC can do is request (rather than compel) any [Academy school to expand.expansion](#). [The](#) Priory School [is](#) currently reluctant to expand by 3FE, but [a 1FE](#) or 2FE expansion remains [a](#) possibility.

NS advised of commitment to review by mid-2020s contained in the Local Plan and possibility that Inspector may also direct an early review. Although it would be preferable to identify solutions for whole plan period to 2031, being able to define a solution to (e.g.) the mid-2020s would also be helpful in this regard.

AG identified that expansion potential at Highfield, Letchworth is constrained by highways and shared access with St Thomas More RC [Primary](#) School.

The possibility of off-site sixth form provision for Letchworth was discussed – both in its own right and as a potential means for facilitating expanded [intakesadmissions](#). The Heritage Foundation have advised NHDC that the former Grammar School site in the town centre is to be vacated. DfE will get first refusal after which site will revert to the Heritage Foundation who are keen to explore educational uses as they do not consider the building is well suited to conversion for other purposes.

It was agreed that HCC will examine feasibility of expansion at the Letchworth secondary schools and also the Heritage Foundation proposal and advise NHDC by the end of August. Any implications for the Local Plan to be further considered once this is received.

[Update since meeting: Feasibility work on the Letchworth secondary schools, which includes Transport Assessments, identifies a minimum +2fe expansion potential at Fearnhill and no further expansion potential at Highfield.](#)

[The Letchworth Heritage Foundation suggestion to consider a 6th Form Centre at the former Grammar School is acknowledged. However, both Letchworth schools are academies and therefore outside of Local \(Education\) Authority control. Notwithstanding this, Hertfordshire secondary schools have 6th forms within their provision and there are no proposals for this to change.](#)

7. Other locations / issues

Barkway – See notes under (3) above

Ickleford – AG advised that feasibility work is ongoing [on the HCC land allocated as site IC3](#). HCC need to understand the likely future levels of demand and whether this supports delivery of (i) the housing allocation and (ii) the relocation of the school. NS advised of

potential additional windfall sites in Ickleford beyond those identified in the plan. AC confirmed that generally primary aged pupils living in Ickleford looked to Ickleford School for primary education provision. There was no substantial overlap with the operation of schools in the north of Hitchin.

Royston – HCC representations request changes to the criteria on Policy RY10 to potentially allow for first school provision. NS updated on the planning applications on this site and on RY1 and noted that HCC had requested financial contribution from RY10 towards school on RY1. AC identified that provision of school on RY10 would mean a concentration of lower-first school provision on the eastern ~~at~~ side of the town. NS queried whether, in the event that RY1 could not come forward, HCC might still wish / need to seek a school here. HCC to consider further though NS noted that these issues may be resolved through the current planning applications. **Note:** *Subsequent correspondence between Richard Tiffin (NHDC), Alexandra Stevens / Sarah Burgess / Sarah ~~McLaughlin~~McLaughlin (HCC) and applicant for RY10 on this matter in relation to the planning applications. NHDC awaiting detailed HCC response following internal meeting.*

Update since meeting: HCC (Development Services/Estates/Children's Services) to meet with RY1 applicants on 29 August.

8. Agreed actions and next steps

- NHDC to provide 1st draft of MoU and suggested amendments to the plan in relation to HCC objections to sites SP14 (Baldock) and SP15 (Letchworth) for HCC comment;
- HCC to further consider secondary education capacity in Letchworth in relation to forecast deficits in Hitchin and, by extension, objections to provision at SP19 (Luton);
- HCC to advise in relation to Ickleford and Royston as / when any additional information is available;
- Further meeting(s) to be held following summer holidays.

9. AOB

- AG discussed NHDC comments on draft minutes of meeting held 24 April 2017 these have been finalised and circulated since this meeting.
- AG to follow up on site visit to Back Lane site with landowner to be undertaken in September.
- LS noted that minutes of meeting of 4 April 2017 not agreed by HCC. AG to check
- AG advised that running HCC forecasting models would be of limited use to NHDC due to uncertainty about detail of tenure and housing mix on sites. Any results would be ~~superceded~~superseded once detailed applications were submitted. Confirmed that running of models is resource intensive and it was agreed not to pursue at this time.

Commented [AG1]: LS was to provide a copy of these as AG was unaware that they had not been agreed by Jacqueline Nixon before she left HCC.

MEMORANDUM OF UNDERSTANDING

BETWEEN

NORTH HERTFORDSHIRE DISTRICT COUNCIL (NHDC)

AND

HERTFORDSHIRE COUNTY COUNCIL (HCC)

as the authority responsible for education

IN RESPECT OF

**THE NORTH HERTFORDSHIRE LOCAL PLAN, PROPOSED SUBMISSION VERSION,
OCTOBER 2016**

1 Introduction

- 1.1 This Memorandum of Understanding (MoU) has been prepared jointly by North Hertfordshire District Council (NHDC) and Hertfordshire County Council (HCC) as the local authority responsible for education in the district (hereafter HCC).
- 1.2 This MoU does not relate to other responsibilities or interests of HCC such as highways, waste & minerals planning or land interests. Any agreement(s) on these matters are, or will be, set out in separate agreements as required.
- 1.3 The Statement sets out confirmed points of agreement between NHDC and HCC with regard to the North Hertfordshire Local Plan and supporting evidence base, which will assist the Inspector during the Examination of the Local Plan.
- 1.4 Local Authorities are required through the Duty to Co-operate (the Duty) to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area.
- 1.5 The National Planning Policy Framework (NPPF) sets out the requirement that public bodies should cooperate on planning issues that cross administrative boundaries and, at Paragraph 156, identifies a series of strategic priorities:
 - The homes and jobs needed in the area.
 - The provision of retail, leisure, and other commercial development.
 - The provision of infrastructure for transport telecommunications, waste management, water supply, wastewater, flood risk and coastal change management.
 - The provision of minerals and energy (including heat).
 - The provision of health, security, community and cultural infrastructure and other local facilities.
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment including landscape.
- 1.6 The NPPF requires Local Planning Authorities to work collaboratively with other bodies to make sure that these strategic priorities are properly co-ordinated across local boundaries and clearly reflected in individual Local Plans.

Commented [NS1]: Sections 1 to 3 are based upon the standard preamble we have used in all our MoU to date with the exception of Para 1.2 which is helpful in this instance.

- 1.7 Local Planning authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross- boundary impacts when their Local Plans are submitted for examination.

2 **Background**

- 2.1 This MoU relates to previous Duty to Co-operate meetings, ongoing discussion between the parties and the representations made by HCC to NHDC's Proposed Submission Local Plan (2016) regarding a number of sites and policies.

3 **Duty to Cooperate**

- 3.1 HCC has continuously responded to public consultations and liaised with Officers as the Local Plan process has developed which has helped inform both the strategy and policy framework within the plan.
- 3.2 Comments received from HCC have been taken into account during the preparation of the plan to address the requirements of the Duty and the NPPF and support sustainable development.

4 **Agreed Matters**

General principles

4.1 More to be added following further discussion

Sites and allocations

- 4.2 It is **agreed** that the following specific policy requirements or criteria in the submitted Plan relating to the provision of additional schools places are appropriate and sound:
- Policy SP14(h) insofar as it relates to additional primary-age education provision North of Baldock;
 - Policy SP17(e) relating to on site provision of a new primary school at Highover Farm, Hitchin;
 - Policy SP19(e) insofar as it relates to new primary-age education provision East of Luton;
 - Site CD5 relating to the expansion of the existing primary school in Codicote;
 - Site KB2 relating to the provision of a new primary school on Land off Gypsy Lane, Knebworth;
 - Site KB4 insofar as it could allow for the expansion of the existing primary school in Knebworth; and
 - Site WY1 relating to the expansion of the existing primary school or its potential relocation to a new site in Little Wymondley.
- 4.3 In addition to the above, it is **agreed** that the expansion of existing schools and / or the utilisation of existing reserve school sites will meet a number of the demands for education provision that will arise from both existing and new development over the plan period.
- 4.4 It is **agreed** that, where applicable, the identification of existing schools and reserve school sites within towns and Category A village boundaries as 'white land', where general

Commented [LS2]: We have decided to leave this open for now depending on outcomes on discussions relating to the Regeneris work etc.

Commented [AG3]: My understanding was that there were going to be amendments to all policies to ensure consistent wording.

development, including education uses, will be supported in principle is an appropriate and sound policy approach.

- 4.5 It is **agreed** that the approach in **paragraph 4.4** provides sufficient scope and flexibility in planning policy terms for HCC (or any other relevant parties) to seek to expand these schools in response to future demand subject to compliance with other relevant and / or detailed policies of the Plan including, but not limited to, design and transport matters.
- 4.6 HCC submitted a number of objections and comments in response to the Proposed Submission Local Plan consultation in November 2016. Further ongoing, active and constructive discussion occurred under the Duty following the receipt of these representations.
- 4.7 This has included more detailed analysis of specific issues raised in HCC's representations and further discussion with, or the provision of additional information by, landowners or their representatives which have provided further clarity on the proposed education arrangements for specific sites.
- 4.8 It is **agreed** that, subject to the acceptance by the appointed Inspector of the proposed modifications listed in the Appendix A and their inclusion in the Local Plan, HCC's objections on the following sites and matters can be considered resolved:
- Policy SP14 insofar as it relates to additional secondary-age education provision North of Baldock;
 - Policy SP15 insofar as it relates to additional primary school provision North of Letchworth Garden City;
 - Site RY10 insofar as it relates to additional first school provision in Royston;
 - **To be added as / when agreement is reached on further issues**

Outstanding matters

- 4.9 **List of outstanding matters to be refined through on-going discussion. Any remaining matters at the time agreement is signed to be listed here.**

Councillor David Levett

<<HCC to advise of signatory>>

Executive Member for Planning and Enterprise

Signed on behalf of

Signed on behalf of

Hertfordshire County Council

North Hertfordshire District Council

<<Date>> 2017

<<Date>> 2017

Appendix 1: Agreed proposed Modifications to the NHDC Local Plan

Text to be deleted shown ~~struck through~~. New text in **bold**.

| Para / ref | Page | Change | Reason [representor no] |
|--|------|---|--|
| North of Baldock | | | |
| Policy SP14 | 61 | <p>...</p> <p>h. Up to 6 forms of entry (FE) of additional primary-age and secondary-age education provision</p> <p>i. Up to 8 forms of entry (FE) of additional secondary-age education provision. A secondary school larger than 6FE will be supported where:</p> <p>i. It is located at the south of the allocation site; and</p> <p>ii. Safe, sustainable and direct routes to school are provided from Clothall Common.</p> <p>[consequential renumbering of subsequent criteria]...</p> | Representations by, and ongoing discussions with, Hertfordshire County Council [16452] |
| After Para 4.180 [new para.] | 62 | <p>At minimum, the site will contain a 6FE secondary school to ensure demand arising from within the development can be met. A larger school could additionally serve existing residents of Clothall Common and adjoining new development at the south-east of Baldock. Appropriate measures to ensure pupils can safely and conveniently walk or cycle to school from the south of the railway line will be required if this scale of provision is pursued.</p> <p>[consequential renumbering of subsequent paragraphs]...</p> | Representations by, and ongoing discussions with, Hertfordshire County Council [16452] |
| North of Letchworth Garden City | | | |
| SP15(a)(iii) | 63 | <p>an appropriate education solution with a presumption in favour of on-site provision of which delivers a new 2FE primary school on-site</p> | Representations by, and ongoing discussions with, Hertfordshire County Council [16452] |
| Para 4.189 | 63 | <p>Sites at this scale generate enough demand to support the provision of new primary schools on site. The presumption is that Site LG1 will follow this principle. However, the irregular shape of the site and the location of surrounding schools and an existing reserve school site in the area mean that this requires further consideration through the masterplanning process to ensure existing school admission intake and travel patterns are not unduly affected.</p> | Representations by, and ongoing discussions with, Hertfordshire County Council [16452] |

Commented [AG4]: Is this wording necessary? Our reps ask for an 8FE secondary school site

Commented [AG5]: Our reps ask for an 8FE secondary school site

| Para / ref | Page | Change | Reason [representor no] |
|-----------------------------|------|---|---|
| Royston | | | |
| Site RY10 (first bullet) | 202 | Appropriate solution for education requirements arising from sites RY12 and RY10... | Planning permission granted on site RY2. Representations by, and ongoing discussions with, Hertfordshire County Council [16452] |

Draft - Confidential

Appendix 1d



**HCC / NHDC Meeting
Thursday 13 July 2017
Town Lodge, Letchworth GC**

Alice Carrington – AC (HCC)
Andrea Gilmour – AG (HCC)
Louise Symes – LS (NHDC)
Nigel Smith – NS (NHDC)

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NS advised of commitment to review by mid-2020s contained in the Local Plan and possibility that Inspector may also direct an early review. Although it would be preferable to identify solutions for whole plan period to 2031, being able to define a solution to (e.g.) the mid-2020s would also be helpful in this regard.

AG identified that expansion potential at Highfield, Letchworth is constrained by highways and shared access with St Thomas More RC [Primary](#) School.

The possibility of off-site sixth form provision for Letchworth was discussed – both in its own right and as a potential means for facilitating expanded [intakesadmissions](#). The Heritage Foundation have advised NHDC that the former Grammar School site in the town centre is to be vacated. DfE will get first refusal after which site will revert to the Heritage Foundation who are keen to explore educational uses as they do not consider the building is well suited to conversion for other purposes.

It was agreed that HCC will examine feasibility of expansion at the Letchworth secondary schools and also the Heritage Foundation proposal and advise NHDC by the end of August. Any implications for the Local Plan to be further considered once this is received.

[Update since meeting: Feasibility work on the Letchworth secondary schools, which includes Transport Assessments, identifies a minimum +2fe expansion potential at Fearnhill and no further expansion potential at Highfield.](#)

[The Letchworth Heritage Foundation suggestion to consider a 6th Form Centre at the former Grammar School is acknowledged. However, both Letchworth schools are academies and therefore outside of Local \(Education\) Authority control. Notwithstanding this, Hertfordshire secondary schools have 6th forms within their provision and there are no proposals for this to change.](#)

7. Other locations / issues

Barkway – See notes under (3) above

Ickleford – AG advised that feasibility work is ongoing [on the HCC land allocated as site IC3](#). HCC need to understand the likely future levels of demand and whether this supports delivery of (i) the housing allocation and (ii) the relocation of the school. NS advised of

potential additional windfall sites in Ickleford beyond those identified in the plan. AC confirmed that generally primary aged pupils living in Ickleford looked to Ickleford School for primary education provision. There was no substantial overlap with the operation of schools in the north of Hitchin.

Royston – HCC representations request changes to the criteria on Policy RY10 to potentially allow for first school provision. NS updated on the planning applications on this site and on RY1 and noted that HCC had requested financial contribution from RY10 towards school on RY1. AC identified that provision of school on RY10 would mean a concentration of lower-first school provision on the eastern ~~at~~ side of the town. NS queried whether, in the event that RY1 could not come forward, HCC might still wish / need to seek a school here. HCC to consider further though NS noted that these issues may be resolved through the current planning applications. **Note:** *Subsequent correspondence between Richard Tiffin (NHDC), Alexandra Stevens / Sarah Burgess / Sarah ~~McLaughlin~~McLaughlin (HCC) and applicant for RY10 on this matter in relation to the planning applications. NHDC awaiting detailed HCC response following internal meeting.*

Update since meeting: HCC (Development Services/Estates/Children's Services) to meet with RY1 applicants on 29 August.

8. Agreed actions and next steps

- NHDC to provide 1st draft of MoU and suggested amendments to the plan in relation to HCC objections to sites SP14 (Baldock) and SP15 (Letchworth) for HCC comment;
- HCC to further consider secondary education capacity in Letchworth in relation to forecast deficits in Hitchin and, by extension, objections to provision at SP19 (Luton);
- HCC to advise in relation to Ickleford and Royston as / when any additional information is available;
- Further meeting(s) to be held following summer holidays.

9. AOB

- AG discussed NHDC comments on draft minutes of meeting held 24 April 2017 these have been finalised and circulated since this meeting.
- AG to follow up on site visit to Back Lane site with landowner to be undertaken in September.
- LS noted that minutes of meeting of 4 April 2017 not agreed by HCC. AG to check
- AG advised that running HCC forecasting models would be of limited use to NHDC due to uncertainty about detail of tenure and housing mix on sites. Any results would be ~~superceded~~superseded once detailed applications were submitted. Confirmed that running of models is resource intensive and it was agreed not to pursue at this time.

Commented [AG1]: LS was to provide a copy of these as AG was unaware that they had not been agreed by Jacqueline Nixon before she left HCC.

Appendix 1e



**HERTFORDSHIRE COUNTY COUNCIL
RESPONSE TO**

**NORTH HERTFORDSHIRE EDUCATION STUDY
FINAL REPORT BY REGENERIS CONSULTING**

JUNE 2017

Executive Summary

This paper provides the response of Hertfordshire County Council to the North Hertfordshire Education Study Final Report produced by Regeneris Consulting.

Hertfordshire County Council (HCC), as a local education authority, has a statutory duty to secure sufficient school places for every child in its area.

Its education planning function is informed by forecasts of pupil demand based on actual data of pre-school and school-aged children living in the area as well as on historic migration patterns.

The County Council works with the ten District Councils within its area in their role as Local Planning Authorities to ensure sufficient education infrastructure is planned for the longer term in line with Local Plan strategic housing growth proposals.

The Regeneris critique does not fully consider the way that HCC deals with development at both the local plan and detailed planning application stages and reaches conclusions which are not fully evidenced or explained.

1. INTRODUCTION

- 1.1 The purpose of this paper is to respond to the North Hertfordshire Education Study Final Report produced by Regeneris Consulting on behalf of North Herts District Council (hereafter referred to as the Regeneris Report).
- 1.2 It is noted that although the Regeneris document is named 'Final Report', the report is watermarked 'Draft'.
- 1.3 This response is presented in four sections:
- Section 1: Introduction
 - Section 2: HCC's general approach towards education planning
 - Section 3: Response of HCC Demographer
 - Section 4: Summary Comments on the Regeneris Report
 - Section 5: Conclusion
- 1.4 Appendix A at the end provides detailed comments in relation to the Regeneris education report.

2. HCC'S GENERAL APPROACH TOWARDS EDUCATION PLANNING

- 2.1. Hertfordshire County Council (HCC), as Education Authority, has a statutory duty to secure sufficient school places for every child living in the county. In terms of plan making, under the Duty-to-Cooperate, Local Planning Authorities (LPAs) are expected to engage positively with each other to make sure sufficient school places will be in place to support new housing allocations.
- 2.2. It is standard practice for HCC to engage with LPAs from an early stage of plan-making. HCC provides baseline information and necessary updates to LPAs which feed into their emerging spatial options.
- 2.3. Whilst HCC acknowledges that it is for each LPA to determine the most appropriate development strategy for its local plan, HCC's legal responsibility is to respond to ensure that sufficient school places, as well as other infrastructure, are secured for the level of local growth planned.
- 2.4. In its engagement with all LPAs in Hertfordshire including North Hertfordshire District Council (NHDC), HCC applies the following steps:
 - When district local planning authorities (LPA) start the plan making process, they engage with the County Council around proposed housing targets, and potential spatial distribution.
 - The LPA will usually set out different scenarios (growth options) across the district and, as part of the plan preparation process, will seek HCC (Property) advice on the County Council service requirements necessary to support the proposed growth.
 - In relation to education, the County Council, in its role as a commissioner of school places, seeks to ensure sufficient education infrastructure is planned to meet the long term needs arising from the proposed housing growth.
 - The County Council will assess the proposed scale and location of the LPA growth proposals in relation to education infrastructure requirements by looking at the following:
 - Location of existing schools (at all tiers)
 - Size of existing schools
 - Existing surplus/deficit of places
 - Latest forecast of pupil demand
 - Other known local committed developments
 - The potential for schools to expand in relation to town planning and site size constraints (this may involve commissioning property feasibility work e.g. highways advice)
 - Whether schools might be expanded or relocated, or if new schools are required

- At the Local Plan stage, HCC calculates anticipated pupil yield from proposed new housing based on 500 dwellings equating to 1 form of entry of pupils in order not to underestimate the impact of proposed future development within the plan period. This yield calculation is applied consistently across the County when strategically planning for the long term as part of the plan making process. This pupil yield approach has been through a number of Local Plan and CIL examinations and those plans have been adopted, including Local Plans/Core Strategies produced by Hertsmere Borough Council, Three Rivers District Council and Dacorum Borough Council. No issues have been raised in relation to this approach.
- The pupil yield calculation was established following the *Primary and Secondary Pupil Yields in New Housing Developments in Hertfordshire* report (February 2015) prepared by the Community Information and Intelligence Unit (CIU) of HCC which set out an analysis of pupil yield data arising from housing developments undertaken by the HCC Demographer. This research project was an extension of an original body of work, funded by the Royal Statistical Society, which examined the accuracy of several beliefs relating to temporal variation in the age profile of residents on new developments in Hertfordshire. Primary and Secondary pupil yield data was sourced from the Schools Census following geo-coding and matching to identified and completed housing development sites of an urban, semi-urban and rural setting type. HCC's demographer determined that the sample size was statistically robust at county level. Overall, findings from the research conducted supported the original yield results, which had concluded a range of 500 to 850 dwellings per one Form of Entry at primary level, would provide 97.5% confidence of not underestimating child yield, and demonstrated this range is still applicable.
- The County Council applies the upper end of the range, 1FE per 500 dwellings, in the first instance to ensure prudent planning
- When considering actual proposals or planning applications, the County Council uses specific development forecasting models to ascertain more tailored demographic profiles, including pupil yields. This information is contained in Appendix A of the representations submitted to NHDC on Regulation 19 Proposed Local Plan consultation document (on behalf of HCC services).
- This methodology is therefore widely used, robust, yet simple and assists the LPAs in producing local plans in a methodical manner and within a reasonable timeframe.

2.5. In the responses submitted by HCC to NHDC during their Regulation 18 and Regulation 19 Local Plan consultations, HCC has clearly and

consistently stated the requirements for education and other infrastructure based upon the above approach and in relation to the amount of new housing proposed in the respective consultation documents.

- 2.6. So, at the master planning or outline planning application stages HCC will also use the 1:500 ratio until more detailed information is available on type, tenure and number of dwellings. At that point HCC will use a detailed, census based model to predict the demand for places required. HCC's approach to dealing with development at a detailed level is explained in the paragraphs above. Figure 3 on page 14 offers an indication of how the HCC approach is further supported by census information.

3. RESPONSE OF HCC DEMOGRAPHER TO REGENERIS REPORT

- 3.1 The following section is the response of the HCC Demographer to the North Hertfordshire Education Study produced by Regeneris Consulting.
- 3.2 Populations are dynamic and constantly changing with time due to many influencing factors such as natural growth, or shrinkage, through births, deaths, migration, socio-economic conditions, housing development and policy changes. Whilst a large area, such as a local authority, may experience growth in its overall population this may not be evenly distributed throughout its age structure or within sub-geographical areas. There are a plethora of different techniques for the estimation of overall population numbers and their age specific constructs where required. Broadly speaking where age specific population projections are required then the cohort survival method tends to be employed in the majority of instances and is the method by which the Office for National Statistics (ONS) produces the Sub-National Population Predictions (SNPP) at local authority level every two years.
- 3.3 This demographic prediction method takes into account five year weighted trends of natural components of change (births and deaths) and migration factors. Whilst the objective of the SNPP is to estimate the future size and age structure of the population of local authorities in England in a consistent way, they do not however account for the effects of local policy changes nor do they take account of future government policies or changing economic circumstances. It is important to note that the SNPP represent projections and not forecasts of population (although the terms are frequently used interchangeably and are normally stated as so in publication) to which there is an important definitional difference:
- A projection is a numerical outcome of an accepted set of assumptions (commonly concerning births, deaths, migration and other factors which influence the demographic equation) and unless a calculation error occurs then a projection is never wrong should the assumed conditions exist within the period under consideration.
 - A forecast is an unconditional statement as it is a conclusion of the most likely outcome of population size in the future without the stipulation of assumptions, although these may well be involved in the forecast process itself, and as such may prove to be right or wrong.
- 3.4 The ONS therefore **do not forecast the population most likely to occur in the future** but rather the population which would arise if their underlying assumptions in births, deaths and migration (based on current trends) should prove to be correct throughout the projection horizon. This appears to have been misinterpreted in the report with regards to the Regeneris Report Table 1.1 footnote denoted as “***” where the SNPP are referred to as forecasts.

- 3.5 Reference is often made to the *Principle Projection* as the single source of the ONS projections data however there are also high and low variants with regard to birth, death and migration assumptions. HCC assumes the Regeneris report applies the principle projection as opposed to the variants although (page 2 of their document) the fact there may be differences between population projections and actual yields realised from new developments is also noted in the report (page 2). Consideration should be given to high and low variants as they form a range within which it is likely that the projected population will lie, in essence they are the confidence intervals.
- 3.6 The ONS projections are not infallible, for example at the United Kingdom level ONS research has determined a mean absolute error of 2.7% over a 20 year projection horizon, this equates to approximately 2.0 million people in error. Projection errors at a much smaller geography such as Local Area District (LAD) are, based on published literature, likely to be higher.
- 3.7 Whilst the SNPP projected population is provided by single year of age breakdown this is for illustrative purposes only, the publication or application of any statistics based on the SNPP should use 5 year aggregations. The cohort survival methodology applied by the ONS differs from the HCC pupil forecast model in that the latter utilises GP registrations and Schools Census data, in conjunction with LAD housing development information, in order to assess future individual school place uptake at a much smaller projection horizon and geography.

The 2014 Sub-National Population Projections (SNPP)

- 3.8 HCC is in agreement with Regeneris that the ONS SNPP 2014 indicates that the population of North Hertfordshire is expected to exhibit growth over the period 2014 to 2039. In particular the primary age population is predicted to exhibit a peak 17% growth during this time (Figure 1) whilst in consideration of the NHDC plan period 2011 to 2031 the overall projected growth in cohort size will be 28% (10,492 in 2011 versus 13,435 in 2031).

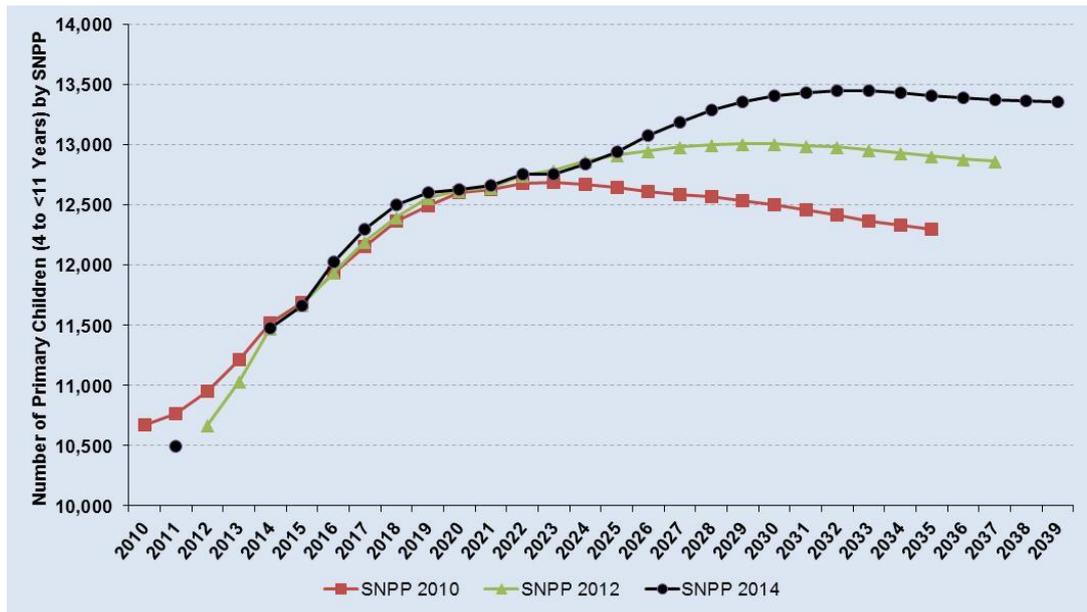


Figure 1. SNPP 2010 to 2014 projected growth in primary cohort size for NHDC.

- 3.9 It is interesting to note from Figure 1 that subsequent ONS releases since 2010 have shown an uplift in the size of the projected primary age population in North Hertfordshire, for example in 2035 the SNPP 2014 cohort is 1,116 persons higher than that projected for this date using the SNPP 2010. As such, over the relatively short period 2010 to 2014, ONS SNPP revisions have resulted in an additional 9% rise in primary age children in 2035 alone.
- 3.10 Whilst the overall 28% rise in primary age cohort size projected over the NHDC plan period is substantial, it is also important to consider the drivers behind this growth. The ONS release as part of the SNPP 2014 supporting data to LAD level on the “components of change”, relevant to the total population, and essentially purporting to Natural Change (births and deaths) and Migration. It can be observed from Figure 2 that the main driver to population growth in North Hertfordshire results from the influx of people into the district positive net migration (note that percentage contributions by year may not sum to 100% due to effects of rounding to 1000 person rates). Toward the end of the projection horizon the dominance of the net migration driver is 90% of total population growth and considerably higher than the 51% reported by the ONS for the United Kingdom (although this increases to 68% when considering the indirect contribution of future migration to population change through its effect on births and deaths).

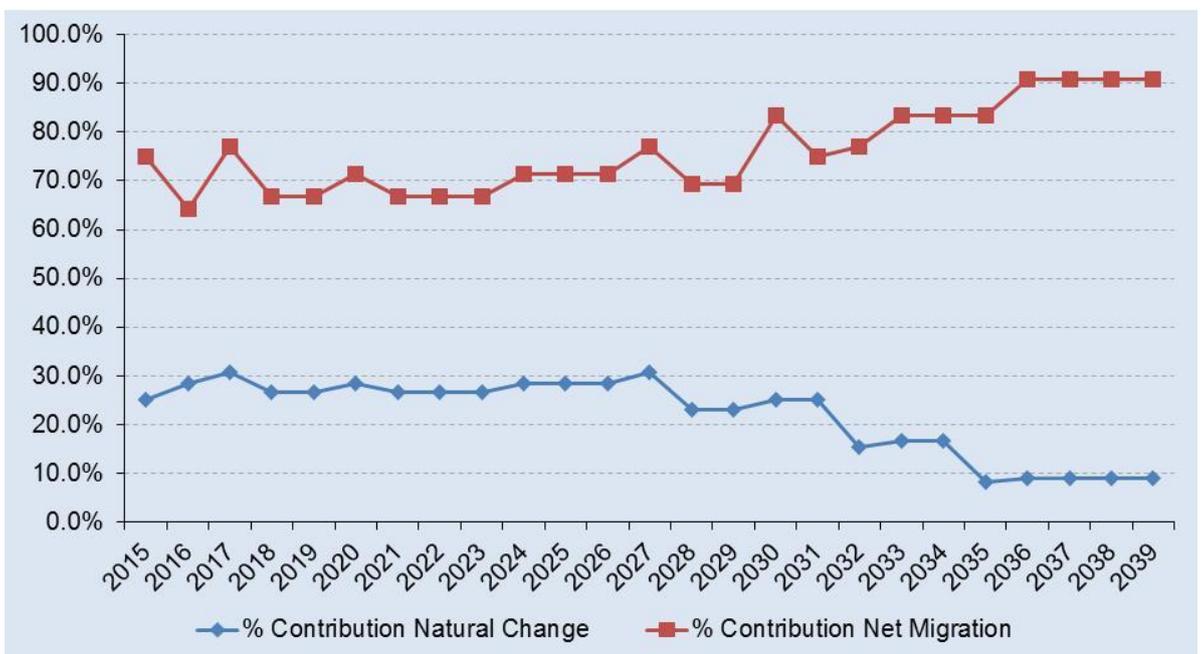


Figure 2. The percentage (%) contribution of Net Migration and Natural Change (births and deaths) to population growth in North Hertfordshire District (Source: ONS SNPP 2014 – Components of Change).

- 3.11 The significance of North Hertfordshire population growth being dominated by net migration should not be under-estimated. The ONS state : *“Migration tends to be concentrated at young adult ages... future net migration has a much greater effect on the projected number of women of childbearing age and hence the projected number of births, than on projected deaths (ONS SNPP 2014 – 29th October 2015)”*.
- 3.12 The demographic characteristics of migrant populations (those that move into dwellings within an area) are generally sufficiently different to that of the population as a whole that they are considered by the ONS as a separate group, much the same way that Special Populations are in the creation of their mid-year estimates.
- 3.13 As NHDC is aware since the mid-2000’s HCC has developed bespoke pupil yield models in order to project likely numbers of children arising from detailed proposed developments such as the Toolkit model and Large Development Model (LDM). Whilst these models are based on 2001 census customised table outputs, the equivalent updated information from the more recent 2011 Census relating to “All Households” and “Migrant Households” at county level has been obtained and also modelled by the authority. The models used to assess the yield from new residential development are generally applied where specific development information is available and are considered by HCC to be more precise than the strategic overview of 1FE arising from 500 dwellings.

The 1 Form of Entry (FE, 210 Primary Age Pupils) From 500 Dwellings Guide

- 3.14 Page 3 of the Regeneris report reflects the points already made within the HCC CIU document that dwelling type, tenure and bed size data

was not collected by the then county demographer during the pupil yield survey. The research was initiated over concerns as to potential primary yield increasing as a result of the 22% rise in live births and 18% rise in the general fertility rate between 2002 and 2011 within the authority. The HCC adjusted yield rate therefore arose from consideration of unspecified “dwellings”, a fact which has been made clear to NHDC in a recent meeting.

- 3.15 The purpose of the 1FE per 500 dwelling guideline is precisely to accommodate situations where proposed developments have a known total dwelling number but no Bed Size, Type or Trajectory data is available. This can arise when LPA’s are working on emergent local plans in determining education need and contact is made with HCC early in the process once their dwelling target is known but little other information may be available. The high level approach minimises the risk to the citizens of Hertfordshire as only in a very small proportion of instances (<2.5%) will the child yield be higher, therefore allowing for prudent strategic planning of future service requirements.
- 3.16 HCC recognised that the 1FE per 500 dwellings yield resulted from a survey which has now become somewhat dated (2008) and is currently in process of implementing an update which will be available later this year. However, it should be noted that this yield level is also supported by the HCC Pupil Yield model which is based on four customised table outputs from the 2011 census relating to All Households and Migrant Households (these are publicly available for download on the ONS website):
- CT0173 - Tenure of household by accommodation type by number of bedrooms – All Households - *All occupied households in unshared dwellings (excluding caravans and other mobile or temporary structures).*
 - CT0174 - Tenure of household by age by accommodation type by number of bedrooms – All Households - *All usual residents living in households in unshared dwellings (excluding caravans and other mobile or temporary structures).*
 - CT0478 - Tenure by bespoke accommodation type by number of bedrooms – Migrant Households - *Wholly moving households (excluding caravans/temporary structures) in unshared dwellings.*
 - CT0479 - Age by tenure by bespoke accommodation type by number of bedrooms – Migrant Households - *All usual residents living in wholly moving households (excluding caravans/temporary structures) in unshared dwellings.*
- 3.17 Subsequent to the 2011 census, and on the basis of the customised table outputs, HCC has developed further models to demonstrate the likely yield from new housing developments, each being able to accommodate a different level of information as summarised below:
- 3.18 The customised table outputs applied above have passed ONS Statistical Disclosure Controls (SDC). The background and

circumstances of application of these models has previously been made to clear to NHDC.

- **“Hertfordshire”** – akin to the 2001 LDM for developments of ≥ 300 dwellings represents the projected yield where the least amount of data is known e.g. total number of dwellings only, although consideration can also be given to a specific bed size mix.
- **“Type”** – This level has the same basis as the Hertfordshire option above although consideration can also be given to type of proposed dwelling (house or flat) by bed size.
- **“Type and Tenure”** – This level represents the projected child yield wherein the most detailed level of information is available with regard to dwelling bed size, type and tenure.

3.19 Combination of tables CTO173 and CTO174 for All Households determined that there were 451,608 households in total within Hertfordshire of which 12.3% were 1 bedroom dwellings, 24.7% were 2 bedroom, 40.1% were 3 bedroom and 22.9% were 4 and above bedroom dwellings. The relevant usual resident population totals by bed size are as shown in Table 1 below; however, within the model these are applied by single year of age.

Table 1. The number of “All Households” residents and dwellings by bed size for the “Hertfordshire” and “Type” modelled levels and the respective percentage (%) dwelling representation by bed size relative to all dwellings.

| | | Bed Size | | | |
|-------------------------------|-----------|-----------------|----------|----------|-----------|
| Hertfordshire | | 1 | 2 | 3 | 4+ |
| Persons | 1,097,683 | 74,947 | 220,330 | 473,749 | 328,657 |
| Dwellings | 451,608 | 55,571 | 111,715 | 181,086 | 103,236 |
| <i>% dwelling mix by size</i> | | 12.3% | 24.7% | 40.1% | 22.9% |

| | | Bed Size | | | |
|-------------------------------|---------|-----------------|----------|----------|-----------|
| Type - Houses | | 1 | 2 | 3 | 4+ |
| Persons | 930,773 | 14,258 | 130,285 | 460,547 | 325,683 |
| Dwellings | 353,351 | 9,778 | 65,318 | 175,921 | 102,334 |
| <i>% dwelling mix by size</i> | | 2.2% | 14.5% | 39.0% | 22.7% |

| | | Bed Size | | | |
|-------------------------------|---------|-----------------|----------|----------|-----------|
| Type - Flats | | 1 | 2 | 3 | 4+ |
| Persons | 166,910 | 60,689 | 90,045 | 13,202 | 2,974 |
| Dwellings | 98,257 | 45,793 | 46,397 | 5,165 | 902 |
| <i>% dwelling mix by size</i> | | 10.1% | 10.3% | 1.1% | 0.2% |

3.20 Combination of CTO478 and CTO479 similarly determined that there were 32,846 migrant households in total within Hertfordshire of which 25.1% were 1 bedroom dwellings, 35.0% were 2 bedroom, 26.5% were 3 bedroom and 13.3% were 4 and above bedroom dwellings. The relevant resident population totals by bed size are as shown in Table 2 however within the model these are applied by single year of age. A migrant household is defined by the ONS as being a wholly moving household in the year prior to the 2011 census taking place. On the basis of the census dwelling mix it can be observed that 60.1% of migrant households moved into 1 or 2 bed dwellings.

Table 2. The number of “Migrant Households” residents and dwellings by bed size for the “Hertfordshire” and “Type” modelled level and the respective percentage (%) dwelling representation by bed size relative to all dwellings.

| | | Bed Size | | | |
|-------------------------------|--------|-----------------|----------|----------|-----------|
| Hertfordshire I | | <i>1</i> | <i>2</i> | <i>3</i> | <i>4+</i> |
| Persons | 71,334 | 10,753 | 21,918 | 24,111 | 14,552 |
| Dwellings | 32,846 | 8,254 | 11,497 | 8,714 | 4,381 |
| <i>% dwelling mix by size</i> | | 25.1% | 35.0% | 26.5% | 13.3% |

| | | Bed Size | | | |
|-------------------------------|--------|-----------------|----------|----------|-----------|
| Type - Houses | | <i>1</i> | <i>2</i> | <i>3</i> | <i>4+</i> |
| Persons | 48,036 | 1,423 | 9,610 | 22,707 | 14,296 |
| Dwellings | 18,252 | 1,030 | 4,813 | 8,130 | 4,279 |
| <i>% dwelling mix by size</i> | | 3.1% | 14.7% | 24.8% | 13.0% |

| | | Bed Size | | | |
|-------------------------------|--------|-----------------|----------|----------|-----------|
| Type – Flats | | <i>1</i> | <i>2</i> | <i>3</i> | <i>4+</i> |
| Persons | 23,298 | 9,330 | 12,308 | 1,404 | 256 |
| Dwellings | 14,594 | 7,224 | 6,684 | 584 | 102 |
| <i>% dwelling mix by size</i> | | 22.0% | 20.3% | 1.8% | 0.3% |

3.21 Detailed information pertaining to HCC’s pupil yield modelling processes is not given herein, the Hertfordshire models are protected under Intellectual Property Rights. A hypothetical development of 1000 dwellings with a seven year build trajectory (150 per annum years 1 to 6 and 100 in year 7) was entered into the Hertfordshire Model, to which the county level 2011 census migrant bed size mix was applied. This determined a peak primary pupil yield of 426 pupils (Figure 3). The 2011 census base data therefore gives rise to 2 Forms of Entry (FE) of primary pupils arising from 1000 dwellings or 1FE resulting from 500 dwellings. Where more specific information is available with regards to a potential development then the yield is likely to change dependent upon Type and Bed Size of the dwellings comprising a development.

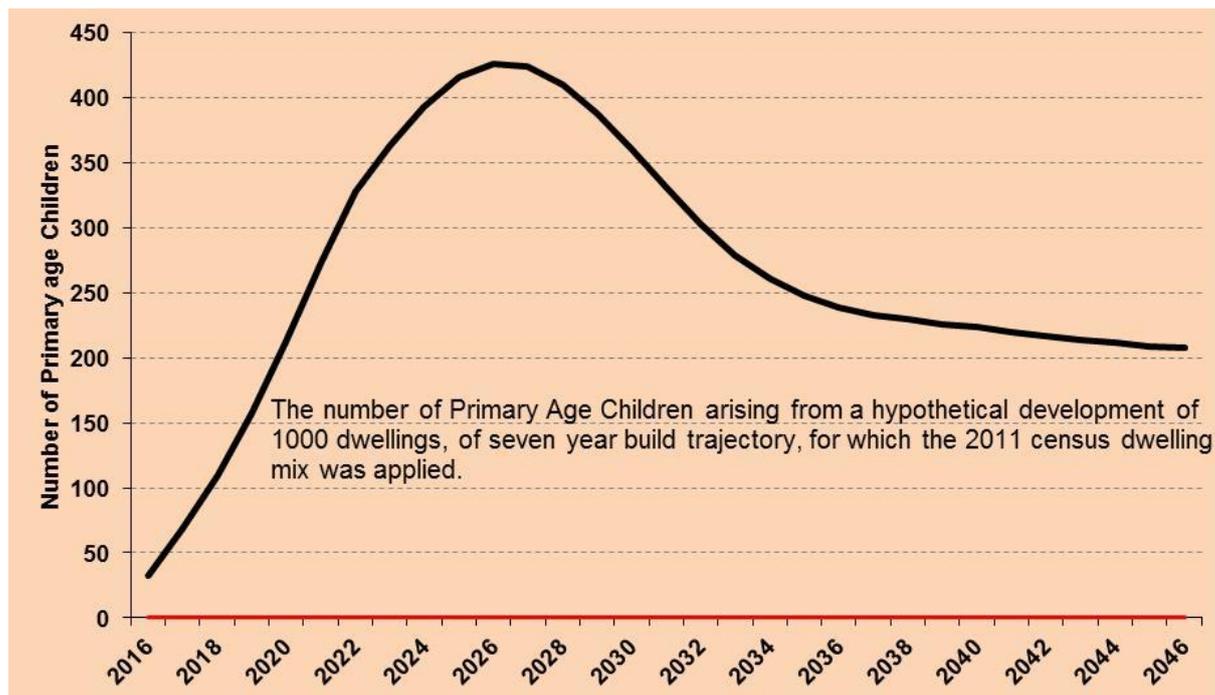


Figure 3. The number of primary age children projected to arise from the Hertfordshire model for an example development of 1000 dwellings of Migrant Household 2011 census bed size mix with 7 year trajectory.

Application of Flat Rate Yields in Other Authorities and the Regeneris Model

3.22 The Regeneris report details how, for North Hertfordshire and Stevenage Districts, a simulated detailed housing trajectory by Bed Size and Type has been applied in order to calculate primary and secondary yield arising from new development on the basis of several methods including their own in-house model (page 8 and 9). These yields, based on assumed detailed information, were then compared to the HCC strategic value of 1FE per 500 dwellings despite the fact it is acknowledged that the HCC ratio is applied wherein detailed development information is not available. Should NHDC provide to the authority a detailed breakdown by Bed Size, Type and Trajectory then HCC can produce a more precise modelled yield however the resulting projection would be **specific** to those parameters. Given the NHDC projection horizon to 2031, and that the purpose of their plan is to provide dwellings for a growing population, which by its nature is likely to fluctuate both in size and age/sex construct over time, then the application of a specific detailed mix is inherently rigid and questionable. Should any variation to such a modelled mix occur in actual build then it would be prudent for the citizens of Hertfordshire that NHDC sign a legally binding agreement that they are responsible, financially or otherwise, for any increased population yield as a result of such amendments.

3.23 The variation in projected yields (whether an increase or decrease) following consideration of more detailed development information can be

evidenced using the Hertfordshire model. Figure 4 displays application of the 2011 census projected yield arising from the same 1000 dwellings and trajectory as previously used however in this instance the Type (house or flat) is taken into account and is based on the census specific Migrant Household underlying census proportional splits by bed size (Table 2). It can be observed that the yield arising from consideration of Type (house or flat) is in this instance lower (peak yield of 224 primary pupils) than that arising from consideration of an unspecified dwelling due to more precise data being available for modelling.

- 3.24 The difference in yield between the Hertfordshire (Dwellings) and the Type (House or Flat) Models is specific to the 2011 census Migrant Household bed size mix and does not indicate that consideration of a developments dwelling type will always result in a lower primary yield. Figure 5 displays the modelled output of an actual proposed development received by HCC wherein it can be clearly observed that the primary yield arising from consideration of the bed size proportional representation of houses and flats, relative to the total number of proposed dwellings, is in this instance higher than that arising when Type is not considered. It is therefore clear that dependent on the characteristics of proposed development then fluctuation can occur in modelled yield either above or below that of the most basic information of dwelling numbers only such as utilised in the HCC strategic overview approach.

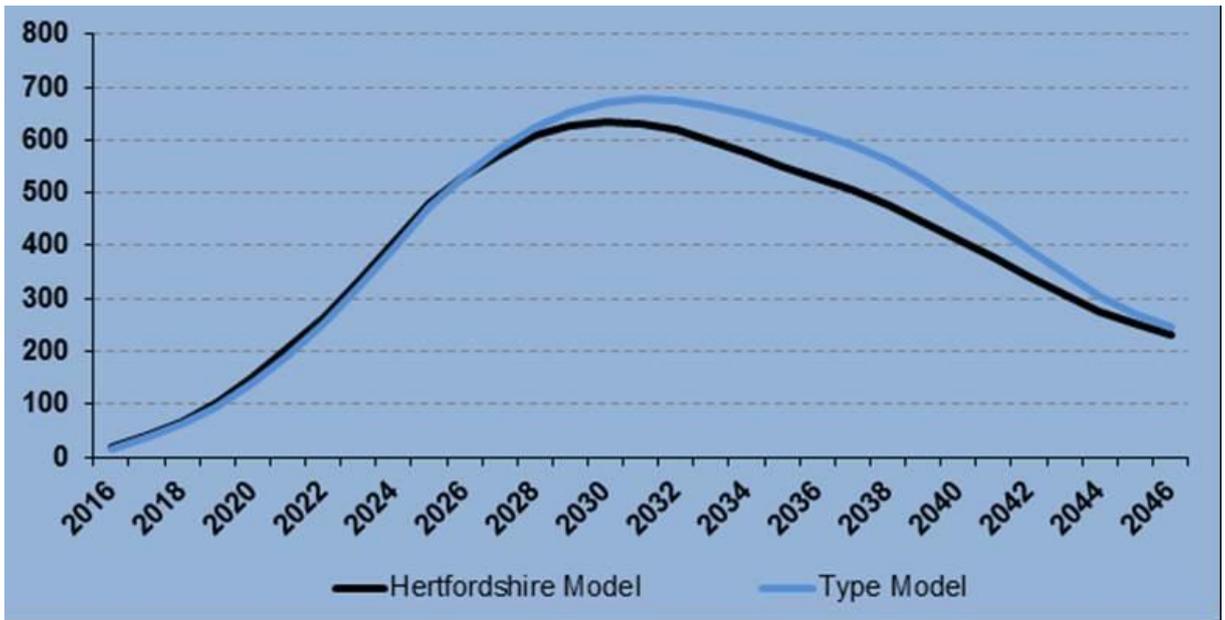


Figure 4. The number of primary age children projected to arise from the Type model for an example development of 1000 dwellings of Migrant Household 2011 census bed size mix with 7 year trajectory

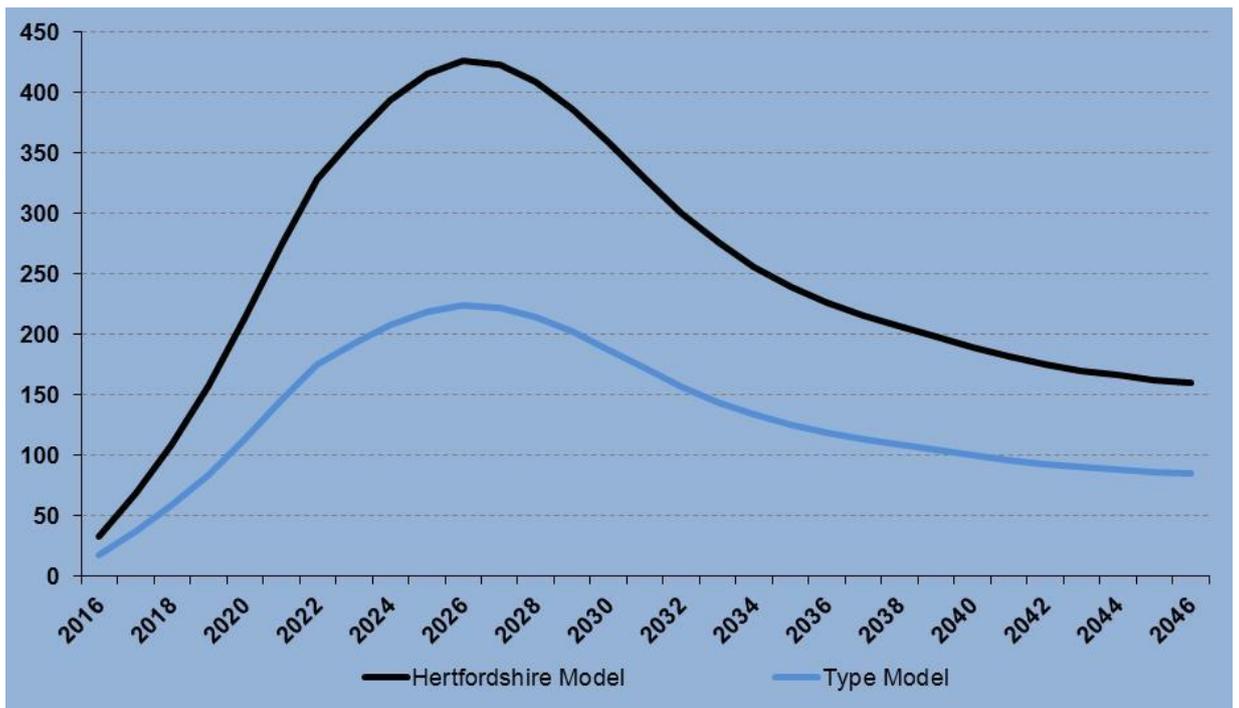


Figure 5. The number of primary aged children arising from a proposed development wherein consideration of detailed dwelling Type information gives rise to a higher yield than considering “number of dwellings” only

3.25 It was indicated on page 9 that the Regeneris model utilised “*mean household sizes for different house types*” as sourced from the DCLG in order to derive an estimated total population. The SNPP 2014 is then applied in order to determine the number of children by single year of age. The resulting yield arising within NHDC was therefore 2,324 primary and 1,560 secondary pupils. The “average household sizes” reflect the size of the usually resident population by dwelling Type and Bed Mix. Regeneris do not state that these “average” values are derived from new build dwellings only and they therefore must represent the area as a whole, this position is also commonly referred to as “All Households”. However, it is clear from 2011 census data that the demographic characteristics of wholly moving households, or “Migrant Households”, differs markedly from that of “All Households” and it is by definition these moving, or migrant, households which will occupy the new dwellings constructed within North Hertfordshire District. This is of particular importance for NHDC given that ONS SNPP 2014 components of change data indicate the driver for population growth within the district is net migration (Figure 2).

3.26 The difference between All Household and Migrant Household yield per 100 dwellings can be investigated on the basis of the example given previously for the Hertfordshire Model (1000 dwellings, 7 year trajectory, 2011 census Migrant Household bed size mix – Table 2).

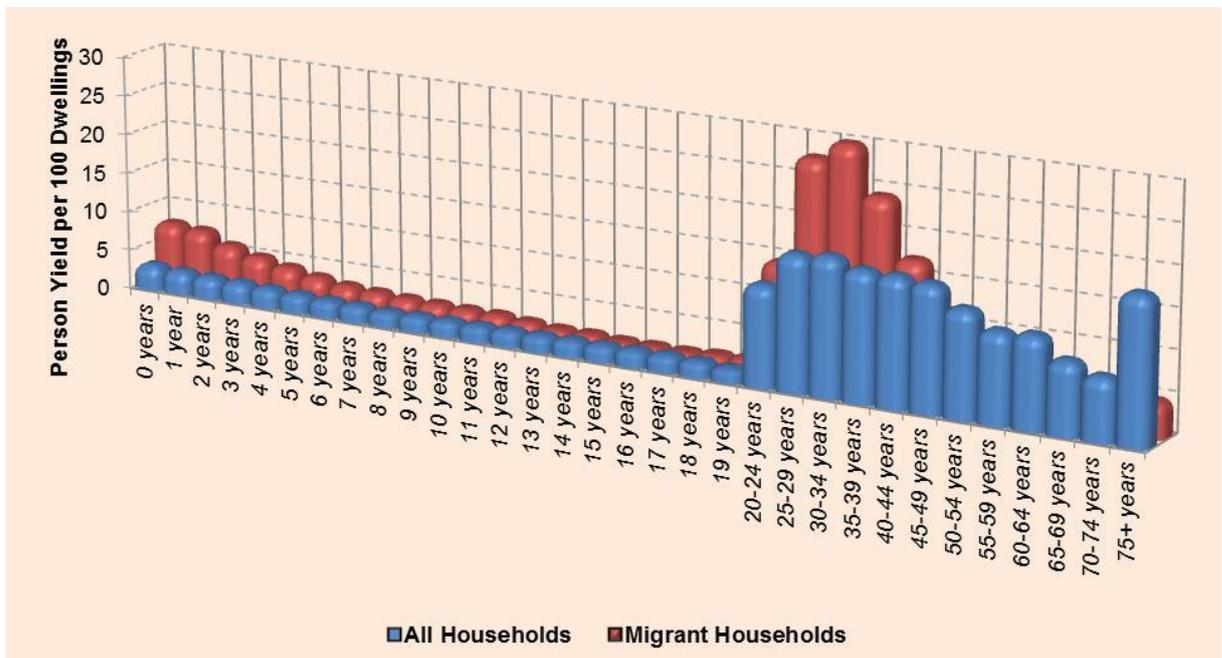


Figure 6. The yield per 100 dwellings for Migrant Households and All Households based on the 2011 census data tables for Hertfordshire in consideration of All Dwellings (Bed size mix reflects that of Migrant Households)

3.27 Figure 6 displays the observably higher yield per 100 dwellings of the younger age cohorts predominantly from 25 through to 39 years which relates to those cohorts whom are of reproductive age. It is also of note that the Migrant Household yields are twice those of All Households in

the Age 0, 1, 2 and 3 cohorts. Whilst the primary age yields are higher for the Migrant Households this is predominantly in the age 4 to 6 cohorts with a tapering to an equivalent yield of All Households beyond this point. It is therefore observable that it is not necessarily a higher yield in primary age cohorts arising from Migrant Households which determines the yield arising from a new development but the ageing of the early years into the primary sector and beyond. The long term effects would be of particular relevance for a development with an extended trajectory.

3.28 Figure 7 displays this difference in yield per 100 dwellings by age between Migrant Households and All Households for the Hertfordshire model example given above wherein positive values indicate a higher Migrant Household yield. For the specified development mix it can be observed that the age 7 to 11 yield is only marginally higher than that of All Households whilst, for the secondary sector, this position is reversed.

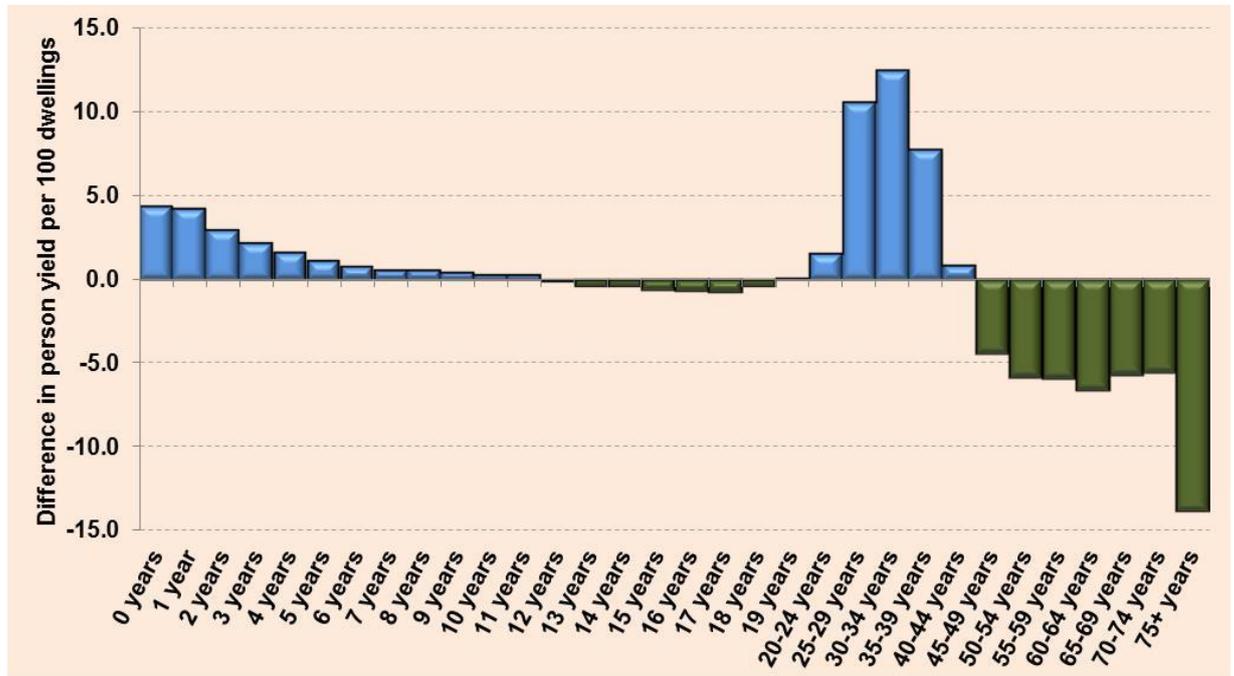


Figure 7. The difference in yield per 100 dwellings between Migrant Households and All Households based on the Hertfordshire model example (Bed size mix for both reflects that of the 2011 census Migrant Households – Table 2 – Positive values are a higher yield in Migrant Households).

3.29 Whilst the differences in yield per 100 dwellings are observable context can be provided by dividing the Migrant Household yields by the All Households. On this basis the age 0, 1, 2, 3, 4, 5 and 6 year old Migrant Households yields per 100 dwellings for the specified development mix are 234%, 238%, 203%, 180%, 162%, 147% and 134% higher than that of the All Households respectively. However, it is not just the migrant yields arising immediately from the completed dwellings which have an impact on projected early years and primary child numbers. As a development progresses and dwellings become occupied they will, over

time, transition into a yield per 100 dwellings rate that reflects that of All Households i.e. a development over time is expected to reflect the demographic characteristics of Hertfordshire overall.

- 3.30 As such the number of births that arise from a development, which age into early years and beyond, will reduce to that expected of All Households although this is a transitional period over a number of years within which the births arising for dwellings completed will still exceed that of All Households. For the Hertfordshire level model example the expected age 0 cohorts which will transition into completed dwellings over time is as shown in Figure 8, it should be noted that these values are specific to the development mix. It can be observed from the specified development mix that not only is the Age 0 (or effective birth) yield per 100 dwellings twice that of All Households but over a number of years, whilst the development transitions to a yield rate of Hertfordshire overall, that the number of modelled births will be higher. This position is supported by the observably higher per 100 dwelling yields occurring within the reproductive age cohorts (Figure 6).
- 3.31 Regeneris have calculated likely primary and secondary yields predominantly on the basis of flat rates per 100 dwellings. In the 1000 dwelling example for the Hertfordshire model given herein the projected peak primary yield was 426 pupils, however the summary primary yield per 100 dwellings within the underlying Migrant Households data set was 21.5 pupils. This equates to a projected primary yield difference of 211 (426 – 215) pupils and occurs as the application of flat rates does not allow for the cumulative transition of the higher yield per 100 dwellings age 0 to 3 cohorts into the primary sector over time. Account is also not given to the higher “birth rates” within a new development as it ages and transitions to a rate equivalent to All Households of an identical dwelling mix.

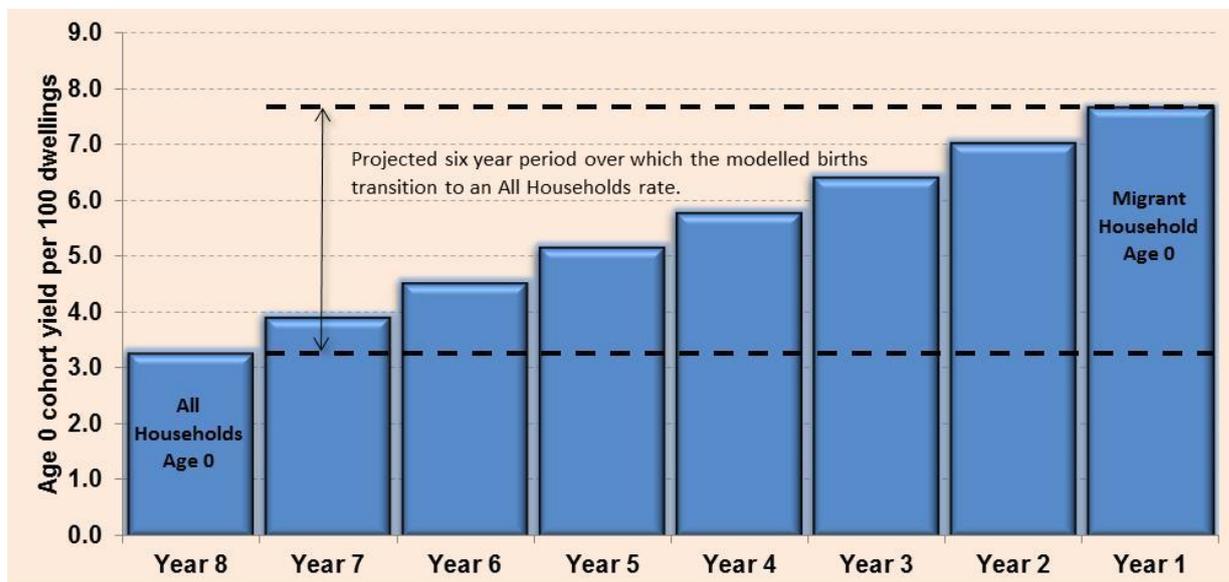


Figure 8. The transition of the Age 0 yield per 100 dwellings from Migrant Households (Year 1) for per annum completed dwellings in a development to that of the All Households yield (Year 8). The data displayed is representative of the Hertfordshire Model example specific development mix.

3.32 In considering the 1000 dwelling Type model example given herein the peak primary yield was 224 pupils and resulting from a 55.5% representation of houses and 44.4% flats by respective census migrant household bed size mix (Table 2). The average primary pupil yield per 100 dwellings from the census base data was 18.3 for houses and 3.1 for flats. Taking into account their proportional representation relative to the development size the calculated average yield would be 102 and 14 pupils respectively, or in summary 116 pupils. The effect of discounting the transition of the younger cohorts into the primary sector is in this example a significant under representation of 108 pupils (224 – 116). On the combination of these factors it is HCC's position that the Regeneris calculations of projected yield are at best a long term average representation and do not deal with the likely peak yields to arise from the NHDC dwelling number proposals within their plan. It is of note that the transition from a peak yield following a development completion to that expected from Hertfordshire overall can take many years as evidenced from Figure 4, consideration cannot be given to the long term average in isolation.

Conclusion

3.33 In consideration of the factors discussed above the following summary conclusions can be drawn:

- The emphasis of the Regeneris report is suggestive that discussions previously held with HCC in regards to the authority's methodical approach to assessing pupil yield flowing from its strategic overview to specific development modelling and the detailed reasons therein have been discounted. HCC uses an informed, evidenced and transparent approach to pupil yield projection which is fair and reasonable.

- NHDC primary sector population growth, relative to the NHDC plan period base of 2011, is projected by the ONS to increase by 28% as at 2031. However since 2010, with each subsequent two-year release of the ONS SNPP, the size of the primary cohorts over time has been projected to increase albeit at different growth rates. Whilst three ONS SNPP releases is not sufficient for trend analysis between release dates it would be prudent for future planning to take consideration of the observed pattern.
- The ONS SNPP 2014 assumptions with regard to net migration are based on trend analysis and ONS panel expert opinion in the few years prior to the projection period release. Given the projection horizon of the NHDC plan to 2031, and the fact that it is widely acknowledged the longer the horizon the greater the projection error (especially by specific age group), particularly in smaller areas such as LAD's, the assumptions therein should be considered with some caution. Additionally the SNPP assume that migration is evenly spread throughout each year which may not reflect reality, for example the release for sale of completed dwellings within a development phase.
- NHDC has made no representation to HCC with regards to its dwelling construction over the 5 year period prior to the 2014 SNPP release, or of the demographic constructs of the occupants of these new dwellings for migrant household occupancy rates, which would form a more appropriate base on which to found future local area projections although a longer period would be preferable. This is relevant given that NHDC population growth has been evidenced by the ONS to be primarily driven by net migration.
- The SNPP do not take into account the detailed characteristics of migrant households specific to Hertfordshire as determined from the 2011 census migrant households data sets.
- The range of yields calculated by Regeneris, using their own model and from other authorities, whilst at best being indicative of long term average yield, should be discounted on the basis that:
 - No reference is made to the statistical closeness of the authorities used in the comparison of yield calculations to that of Hertfordshire County Council. Application of flat rate yield projections (whether from demographic, census or survey means) applied from authorities which do not exhibit both the historic and likely future population growth by person age of Hertfordshire, and other attendant socio-economic drivers, is questionable.
 - Flat rate yields in themselves are likely to under-predict child yield arising from a proposed number of dwellings as evidenced herein. This is irrespective of whether these yield assumptions are derived from survey or demographic means. In both circumstances little or no consideration is taken of the age 0 to 3 cohort sizes which transition into the primary sector. In the Regeneris report there is a dependency on DCLG All Households data as opposed to

Migrant Households which are acknowledged by the ONS, as demonstrated herein specific to Hertfordshire, to have substantially different demographic characteristics. Regeneris therefore project pupil yield on the basis of a resident population which does not reflect the characteristics of NHDC proposals and is fundamentally flawed.

- The projections simulated by Regeneris are for a specific dwelling type and bed size mix, given the inherent fluctuations in population structure (particularly where net migration is the driver behind population growth) and corresponding dwelling requirements such a rigid approach is unlikely to reflect actual requirements in the future, and therefore child yield, across the projection period.
- The majority of the “similar” local authority methods used by Regeneris in their comparison to the HCC strategic yield exclude any children arising from 1 bed dwellings. This is erroneous as comparison of 2001 and 2011 census Migrant Households data has demonstrated a considerable increase in early year’s children within these sized dwellings (1 and 2 bed dwellings form 60.1% of the household bed size within Hertfordshire’s migrant household data – Table 2). These children will naturally age into the primary sector and their exclusion therefore artificially reduces any calculated yield. This would be particularly relevant to the Cambridgeshire County Council yield which extends this to 2 bed dwellings (with the exception of social rented).
- The HCC survey and 2011 census data supported yield of 1FE per 500 dwellings is a strategic overview to ensure that prudent local district planning is in place to cope with likely future education demands. As particular developments transition into the planning phase, and more detailed information with regards to Type and Bed Size is available, then the authority can apply its bespoke models in order to calculate more precise yields.

4. SUMMARY COMMENTS ON THE REGENERIS REPORT

- 4.1 The Regeneris report has raised a number of questions in terms of HCC's assumptions for pupil yield and future needs for school places in North Hertfordshire District. These questions are outlined in the section below with HCC's comment on the respective concerns. More detailed comments on the Regeneris report can be found in **Appendix A**.

| IN RELATION TO PUPIL YIELD | | |
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| Paragraph no. | Point raised in the Regeneris Report | HCC Response |
| Paragraph 2.6, 1 st bullet point | The yield is based on results from a survey of 45 Hertfordshire developments undertaken by HCC's demographer in 2008 for a separate body of research and was therefore not a purpose built survey. | <p>While the sample size may appear small, collectively they are deemed the most representative group of samples available for the purpose of the CIU report. Please refer to paragraph 4.1 of the CIU report which indicates that a total of 44 large scale developments were identified to give a total of 24,346 sampled dwellings.</p> <p>Regardless of whether the survey is purpose built, the data and the analysis have been proved to be robust. The resulting assumptions i.e. 500 dwellings to 1FE has been found to be a sound approach after being tested at Local Plan examinations.</p> |
| Paragraph 2.6, 2 nd bullet point; Paragraph 5.3 | The information is somewhat out-of-date | <p>While it is acknowledged that a significant proportion of the development included in the survey were completed more than 10 years ago, given the low number of large scale development (average 500+) it is only reasonable for any survey of this kind to include as many sample as possible to maximise its sample size, even if the developments have been delivered some time ago.</p> <p>While the Regeneris report seems to be concerned about this particular approach, it does not appear to have provided any evidence to suggest this approach is inappropriate or to have provided any alternatives.</p> |
| Paragraph 2.6, 3 rd bullet point | The sample size was considered to be statistically robust at County level but it was noted there were | The Regeneris report seems to have accepted that HCC's approach is for 'high level school planning'. As an education authority it is prudent for HCC to apply a consistent approach across |

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| | <p>significant variations in pupil yields across the districts within Hertfordshire, predominantly as a result of the small number of developments included within the study in some districts. A total of three (6.6%) developments were surveyed in North Hertfordshire.)</p> | <p>the entire county at the Local Plan stage. In fact, it would not be appropriate to have different sets of 'high level' requirements for each individual LPA.</p> <p>HCC is aware that the CIU report concluded that a range of 500 to 850 dwellings per 1 FE at primary level would be statistically robust. Bearing in mind HCC's legal duty to make provision for sufficient school place for all pupils, it is prudent to apply the higher end of the range i.e. 500 dwelling per 1FE to minimise the risk of underestimation.</p> |
| <p>Paragraph 2.6, 4th bullet point</p> | <p>The developments were "reported to be mixed in terms of dwelling type, tenure and size although data relating to these parameters was not collected". The resulting pupil yields are therefore not variable by dwelling size.</p> | <p>Most local plans will have relevant policies seeking to achieve a certain dwelling mix. However, at the local plan stage this cannot be treated as what will actually be delivered.</p> <p>As suggested above, given the importance to secure sufficient education provision from development there is an obvious case for applying HCC's 500 dwelling per 1FE approach to minimise the risk of underestimation. Again, HCC will assess education requirements for individual planning applications when more detailed information becomes available.</p> |
| <p>Paragraph 2.6, 5th bullet point; Paragraph 2.8</p> | <p>There is no apparent distinction between primary and secondary school yields.</p> | <p>Primary children age and work their way through the primary education system and into the secondary. Accordingly the overall yield will be very similar albeit with a time lag. In fact, legislation requires all young people to stay in a designated learning environment until the age of 18 from 2015 onwards.</p> |
| <p>Paragraph 2.6, 6th bullet point</p> | <p>These yields are then adjusted using standard deviation to ensure a 97.5% confidence level of not under-estimating the yield of pupils arising from new developments. Or, in other words, the adjusted yield would only be exceeded by 2.5% of the observed distribution. This</p> | <p>It is accepted that the confidence level used in the CIU report may be on the high side in comparison with other authorities. However, since details of developments are unknown at the local plan stage, this approach is a prudent response to need. In addition, not all the statistical neighbours of HCC are included for comparison i.e. Surrey, Buckinghamshire, Berkshire, etc.</p> |

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| | <p>results in a near doubling of the above ratios, with the adjusted primary school pupil yield ranging from 40.8 to 42.8 pupils per 100 dwellings and the adjusted secondary school pupil yield ranging from 24 to 34.8 pupils per 100 dwellings. In practice, if 10 new primary schools were built to accommodate the additional demand arising from 10,000 new dwellings the schools could be under-subscribed by around 55%.</p> | <p>It is noticeable that there is a range within the other example authorities. In that scenario, one authority must be at the top end, whilst another will be at the bottom. Given the complexity in the planning system and the development industry, it would be far more difficult to increase the requirement at a later stage where pupil yields have been underestimated. In contrast, it would be relatively easy for LPAs to reduce the education requirement at the planning application stage and use the residual land/finance to achieve other local plan objectives.</p> |
| Paragraph 3.1 – 3.3 | <p>Baseline data used to calculate Primary and Secondary school capacity (current and forecast)</p> | <p>The conclusions round surplus/deficit places are flawed. The tables use net capacity and number on roll to calculate surplus/deficit of places rather than the number of places available in each year group.</p> <p>Pupils are taught in year groups based on age. A surplus of places in one year group is irrelevant if demand exceeds the number of places available in another year group. To conclude the level of surplus places across an area based on the calculation applied is too simplistic. Assessing availability of places against demand in this way would risk HCC failing in its statutory duty to ensure a place for every child in its area.</p> <p>The Report also fails to address school organisation structures based on 0.5fe or 1fe groupings to meet KS1 class size legislation and operational requirements.</p> |
| Table 3.2 | <p>HCC Pupil Planning data</p> | <p>Some of the data referred to in the Regeneris report is incorrect. For instance, the capacity data for Royston Upper School and Hitchin¹ Primary are both incorrect (Year 9 figures).</p> |
| Paragraph 4.2, 1 st | <p>Regeneris Housing Impact Model</p> | <p>a. No reference is made to the statistical closeness of the authorities used in</p> |

¹ HCC increased the number of places in Hitchin by 1fe in 2014 (temp), 0.83fe places in 2016 (perm) and a further 1fe (temp). The change in number of places available is not taken account of in the Regeneris calculations.

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| <p>bullet point</p> | | <p>the comparison of yield calculations to that of HCC. Application of flat rate yield projections (whether from demographic, census or survey means) applied from authorities who do not exhibit both the historic and likely future population growth (both overall and by relevant age band) and other attendant socio-economic drivers, is questionable.</p> <p>b. Flat rate yields in themselves may under-predict child yield arising from a proposed number of dwellings as evidenced herein. This is irrespective of whether these yield assumptions are derived from survey or demographic means. In both circumstances little or no consideration is taken of the age 0 to 3 cohort sizes which transition into the primary sector.</p> <p>c. There is a dependency on DCLG All Households data as opposed to Migrant Households which are acknowledged by the ONS, as specific to Hertfordshire, to have substantially different demographic characteristics. Regeneris therefore project pupil yield on the basis of a resident population which does not reflect the characteristics of NHDC proposals.</p> <p>d. The projections simulated are for a specific dwelling type and bed size mix. Given the inherent fluctuations in population structure (particularly where net migration is the driver behind population growth) and corresponding dwelling requirements such a rigid approach is unlikely to reflect actual requirements in the future, and therefore child yield, across the projection period.</p> <p>e. The majority of the “similar” local authority methods used by Regeneris in their comparison to the HCC strategic yield exclude any children arising from 1 bed dwellings. This is erroneous as comparison of 2001 and 2011 census Migrant Households data has demonstrated a</p> |
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| | | <p>considerable increase in early year's children within these sized dwellings (1 and 2 bed dwellings form 60.1% of the household bed size within Hertfordshire's migrant household data – Table 2). These children will naturally age into the primary sector and their exclusion therefore artificially reduces any calculated yield. This would be particularly relevant to the Cambridgeshire County Council yield which extends this to 2 bed dwellings (with the exception of social rented).</p> <p>f. It is not clear why Regeneris has excluded the Luton East Allocations which form a major part of NHDC's housing trajectory. Even if the site is self-contained it would require additional education provision.</p> |
| Paragraph 4.2, 2 nd bullet point | Alternative Pupil Yield Calculator | <p>There is no description or explanation regarding the alternative pupil yield calculators Regeneris have selected. Therefore it is not clear how comparable they are, or whether they are based on specific local information.</p> <p>The primary school places vary from 3,622 to 7,403 with the alternative pupil yield calculations used by Cambridgeshire County Council and Bracknell Forest Unitary Authority respectively. In this case, it is not clear which alternative pupil yield calculator is considered to be the reliable one. HCC believes that each county has its own geographical character/settlement pattern/ demographic distribution etc. A multiplier that works for one county may not work for another.</p> <p>HCC applies a different approach to detailed schemes depending on the scale, specific mix and nature of the development. However, the Regeneris report has failed to consider this when comparing the pupil yield to other counties.</p> |
| Paragraph 4.2, 3 rd bullet point | Sub-National Population Projections (SNPP) 2014-based | <p>The NHDC Proposed Submission Local Plan 2011-2031 has used the findings of the Stevenage and North Hertfordshire</p> |

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| | | <p>SHMA Update 2015 as part of its evidence base.</p> <p>The SHMA identified the OAN (Objectively Assessed Need) figure for North Herts and Stevenage between 2011 and 2031.</p> <p>However, SNPP figures are used as one of the methodologies in the Regeneris report, not the SHMA. This appears to contradict the approach used in the Local Plan.</p> |
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5. CONCLUSION

- 5.1 This paper provides the County Council's response to the Regeneris report prepared for NHDC.
- 5.2 HCC consider that the Regeneris Report does not fully consider the methods used by County Council to assess development at both the local plan and detailed planning application stages with regard to school place planning. It reaches conclusions which are not fully evidenced or explained.
- 5.3 Hertfordshire County Council (HCC), as a local education authority, has a statutory duty to secure sufficient school places for every child in its area. Its education planning function is informed by forecasts of pupil demand based on actual data of pre-school and school-aged children living in the area as well as on historic migration patterns.
- 5.4 HCC works with all ten District Councils in the County in their roles as Local Planning Authorities to ensure sufficient education infrastructure is planned for the longer term in line with Local Plan strategic housing growth proposals.
- 5.5 HCC would welcome the opportunity to discuss their response to the Regeneris Report with NHDC officers.

Appendix A – Detailed Comments to the Regeneris Report

| Paragraph no. | Regeneris Report | HCC Response |
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| <p>Executive Summary</p> <p>Background v.</p> | <p>In summary, HCC’s objections rely on a statistically adjusted yield derived from a small number of developments across Hertfordshire based on a study that was originally undertaken for a different purpose. There is no apparent distinction made between primary and secondary school yields, despite a significant difference in the ranges between the two.</p> | <p>The focus of this section is simply the 1:500 dwelling/pupil yield calculation. It ignores the fact other HCC Census based planning obligation tools (normally used during the planning application stage) can support this assessment. It also comments that no distinction is made between primary and secondary schools.</p> <p>This may indeed be the case with the high level work; however, it is important to point out that the children in the younger primary cohort do age through the system as opposed to disappearing. It would appear more likely that the higher birth rates simply have not impacted at secondary level yet so there will be a lag as opposed to a disappearance. In fact, legislation requires all young people to stay in a designated learning environment until the age of 17 from 2013 and the age of 18 from 2015 onwards under the Education and Skills Act.</p> |
| <p>Executive Summary</p> <p>Future Growth (bullet point 2)</p> | <p>Pupil yield calculators from elsewhere – we apply pupil yield ratios from neighbouring and similar authorities to the housing trajectories and compare the outputs with HCC’s own pupil yield ratio.</p> | <p>The pupil yield calculators from other local authorities do not seem to be directly comparable with HCC’s high level pupil yield ratio. The multipliers included in the report are more specific and should be more akin to one of HCC’s detailed developed models. The child yield multipliers indicate a distinct variance across authorities. This does not by implication mean that HCC’s ratio is incorrect; merely that it seems to be high or at the higher end of the range. HCC believes that each county has its own geographical character/settlement pattern/demographic distribution, etc. A multiplier that works for one county may not work for another.</p> <p>No attempt to explain those differences is made by Regeneris.</p> |
| <p>Table 1.1</p> | <p>Comparison of pupils yield for North Hertfordshire and Stevenage based on different methodologies</p> | <p>There is no mention in the Regeneris Report of how the authorities used as comparators for pupil yield were selected.</p> |

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| | | <p>With the model HCC used, the pupil yields vary from 500 to 850 depending on the different mix of each independent scheme. The yield generated by a general rule and some other more sophisticated methods used by other Local Authorities at the planning application stage, are not comparable.</p> <p>There is a risk in making assumptions without knowing the development details of each site or the timing of delivery in the plan period.</p> |
| Para 2.3 | <p>...“When undertaking high level school place planning related to new residential development, HCC determines child yield based on a ratio of 1 Form (FE) PER 500 dwellings to be 97.5% confident of not underestimating yield”.</p> | <p>The consultants seem to be aware that the 500 = 1fe is used when undertaking “high level school place planning” but do not appear to take this into account in their comparisons or interpretation in the rest of the study. They focus only on the general rule of 1:500 dwelling/pupil yield calculation and ignore the fact that other HCC Census based planning obligation tools (normally used during the planning application stage) could refine the calculation at a later stage.</p> |
| Para 2.4 | <p>Taking Site BA1 as an example, Policy SP14 refers to additional 6FE primary-age and secondary-age school provision as part of an overall masterplan to be prepared for the site. However, HCC object to this level of provision and instead suggest that the 3,600 homes proposed in Baldock would yield demand for 7.2 FE of school places (3,600/500) and on this basis a pattern of new primary school sites to accommodate 8FE in total and a new 8FE secondary school site should be provided.</p> | <p>It is important to remember the context here is the local plan level, where new housing growth is being considered in the absence of any certainty regarding for example, the sizes of dwellings. HCC has a duty to ensure sufficient places are available for the children who need them.</p> <p>Accordingly HCC has to be careful not to underestimate what might be required at this stage. The practical implication of this is that if demand turns out to be overestimated at an early stage decisions can be made regarding the design of a site. If however, demand is underestimated this will be difficult to rectify later since additional land for schools will need to be found. This may result in HCC failing in its statutory duty to ensure sufficient school places in its area as well as questioning the soundness of a Local Plan.</p> <p>When details of the scheme are known, more specific modelling can be undertaken to confirm or amend the quantum required.</p> |

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| <p>Para 2.5</p> | <p>NHDC consider the emerging local plan contains sufficient actual and contingent requirements to meet HCCs purported requirements</p> | <p>The HCC Property (Development Services) dated 29/11/2016 dispute this point.</p> |
| <p>Para 2.6 (1st bullet point)</p> | <ul style="list-style-type: none"> The yield is based on results from a survey of 45 Hertfordshire developments undertaken by HCC's demographer in 2008 for a separate body of research and was therefore not a purpose built survey. | <p>The information collected by the HCC demographer was to create statistical models of the age profile of residents on new developments. Using the information collected from the survey as a baseline is considered appropriate; the information serves its purpose at high level.</p> <p>While the sample size may appear small, collectively they are deemed the most representative group of samples available for the purpose of the CIU report. Please refer to paragraph 4.1 of the CIU report which indicates that a total of 44 large scale developments were identified to give a total of 24,346 sampled dwellings.</p> <p>Regardless of whether the survey is purpose built, the data and the analysis has been proved to be robust enough and the resulting assumptions, i.e. 500 dwellings for 1FE, has served Hertfordshire well and have been found to be a sound approach after being tested at Local Plan examinations.</p> |
| <p>Para 2.6 (2nd bullet point)</p> | <ul style="list-style-type: none"> According to the CIU report, which was produced in 2015, "greater than sixty percent of the developments included in the survey were completed more than ten years ago (prior to 2005) and thirty percent were more than twenty years ago (prior to 1995) – some as much as fifty years ago. | <p>While it is acknowledged that a significant proportion of the development included in the survey were completed more than 10 years ago, given the low number of large scale developments (average 500+) it is only reasonable for any survey of this kind to include as many samples as possible to maximise its sample size, even if the developments have been delivered some time in the past.</p> <p>The Regeneris report appears to be concerned about this particular approach. However, it does not appear to have provided any evidence to suggest this approach is inappropriate, or provided any alternatives.</p> |
| <p>Para 2.6 (3rd bullet point)</p> | <ul style="list-style-type: none"> The sample size was considered to be statistically robust at County level but it was noted there | <p>The Regeneris report seems to have accepted the fact that HCC's approach is for 'high level school planning'. As the education authority for Hertfordshire, it is</p> |

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| | <p>were significant variations in pupil yields across the districts within Hertfordshire, predominantly as a result of the small number of developments included within the study in some districts. A total of three (6.6%) developments were surveyed in North Hertfordshire.</p> | <p>prudent for HCC to apply a consistent approach across the entire county at the Local Plan stage. In fact, it would not be appropriate to have different sets of ‘high level’ requirements for each individual LPA.</p> <p>HCC is well aware of the fact the CIU report concluded that a range of 500 to 850 dwellings per 1 FE at primary level would be statistically robust. Bearing in mind HCC’s legal duty to make provision for sufficient school place for all pupils, it is prudent to apply the higher end of the range i.e. 500 dwelling per 1FE to minimise the risk of underestimation.</p> <p>That being said, HCC considers more detailed proposals or planning applications with specific development forecasting model(s) to forecast pupil yield/education contributions e.g. at the planning application stage. Broadly speaking, education contributions are calculated using a HCC developed census-based model which forecasts the number of children likely to emerge from different types, sizes and tenures of dwellings. The expected number of children is then multiplied by the cost of a pupil place resulting in a contribution figure.</p> |
| <p>Para 2.6 (4th bullet point)</p> | <ul style="list-style-type: none"> • The developments were “<i>reported to be mixed in terms of dwelling type, tenure and size although data relating to these parameters was not collected</i>”. The resulting pupil yields are therefore not variable by dwelling size. | <p>While most local plans will have relevant policies seeking to achieve a certain dwelling mix, this cannot be treated as what will actually be delivered on the ground.</p> <p>As suggested above, given the importance to secure sufficient education provision through development there is an obvious case for applying the HCC’s 500 dwelling per 1FE approach to minimise the risk of underestimation. Again, HCC will access education requirements for individual planning applications where more details become available.</p> |
| <p>Para 2.6 (5th bullet point)</p> | <ul style="list-style-type: none"> • Primary and secondary pupil yields were calculated for all developments as well as separately for those completed within the last | <p>If a development generates 1FE of primary pupils, at some point in the future these children will age and work their way through the primary education system and into the secondary. Accordingly the overall</p> |

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| | <p>ten years (of which there were fifteen), as follows:</p> <ul style="list-style-type: none"> □ The average countywide primary pupil yield resulting from all 45 developments was 23.8 pupils per 100 dwellings, and 23.2 pupils per 100 dwellings for <10 year developments □ The average countywide secondary pupil yield resulting from all 45 developments was 17 pupils per 100 dwellings, and 11.8 pupils per 100 dwellings for <10 year developments (this includes a post 16 component). | <p>yield will be very similar albeit with a time lag. In fact, legislation requires all young people to stay in a designated learning environment until the age of 17 from 2013 and the age of 18 from 2015 onwards under the Education and Skills Act.</p> |
| <p>Para 2.6 (6th bullet point)</p> | <ul style="list-style-type: none"> • These yields are then adjusted using standard deviation to ensure a 97.5% confidence level of not under-estimating the yield of pupils arising from new developments. Or, in other words, the adjusted yield would only be exceeded by 2.5% of the observed distribution. This results in a near doubling of the above ratios, with the adjusted primary school pupil yield ranging from 40.8 to 42.8 pupils per 100 dwellings and the adjusted secondary school pupil yield ranging from 24 to 34.8 pupils per 100 dwellings. In practice, if 10 new primary schools were built to accommodate the additional demand arising from 10,000 new dwellings the schools could be under-subscribed by around 55%. | <p>As outlined above, since details of developments are unknown at the local plan stage this approach comprises a prudent response to need.</p> <p>Given the complexity in the planning system and the development industry, it would be far more difficult to increase the requirement at a later stage where pupil yield has been underestimated. In contrast, reducing the education requirement if appropriate at the planning application stage would offer the LPA the opportunity to use the residual land/finance to achieve other local plan objectives.</p> |
| <p>Para 2.6</p> | <ul style="list-style-type: none"> • These yields are then adjusted using standard | <p>Some of the data referred to in the Regeneris report seems to be incorrect.</p> |

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| <p>(7th and 8th bullet point)</p> | <p>deviation to ensure a 97.5% confidence level of not under-estimating the yield of pupils arising from new developments. Or, in other words, the adjusted yield would only be exceeded by 2.5% of the observed distribution. This results in a near doubling of the above ratios, with the adjusted primary school pupil yield ranging from 40.8 to 42.8 pupils per 100 dwellings and the adjusted secondary school pupil yield ranging from 24 to 34.8 pupils per 100 dwellings. In practice, if 10 new primary schools were built to accommodate the additional demand arising from 10,000 new dwellings, the schools could be under-subscribed by around 55%.</p> <ul style="list-style-type: none"> • The CIU report goes on to state that, on average, one FE at primary stage (210 pupils) would be generated from between 880 dwellings (based on the unadjusted yield from all 45 developments of 23.8 pupils) and 490 dwellings (based on the adjusted yield of 42.8 pupils from <10 years old developments). The report notes that “<i>applying a one Form of Entry arising from the latter number of dwellings minimises the risk to the authority of under predicting pupil yield arising from new developments</i>”. | <p>For instance, the capacity data for Royston Upper School and Hitchin² Primary are both incorrect (Year 9 figures).</p> <p>Notwithstanding any possible errors in the Regeneris calculations HCC must ensure that all children requiring a school place are provided with one. School expansions are usually by whole (30 places) or half form (15 places) of entry.</p> |
| <p>Para 2.8</p> | <p>In HCC’s Objections to NHDC’s emerging local plan</p> | <p>The younger age groups will age and work their way through the primary education</p> |

² HCC increased the number of places in Hitchin by 1fe in 2014 (temp), 0.83fe places in 2016 (perm) and a further 1fe (temp). The change in number of places available is not taken account of in the Regeneris calculations.

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| | <p>they rely on the upper end of this range (1 FE per 500 dwellings based on the adjusted yield derived from the fifteen developments completed in the last ten years). There is no clear distinction made between primary and secondary school yields, despite the difference in ranges we have highlighted.</p> | <p>system and into the secondary. Accordingly the numbers will be similar albeit with a time lag and a possible drop before sixth form depending on stay on rates at that time.</p> |
| Section 3 | <p>Regeneris has assessed the level of surplus/deficit school places across the North Herts area by comparing the number on roll with capacity.</p> | <p>This approach is flawed as it fails to take account of the changes in number of places available year on year across the area.</p> |
| Table 3.1 | <p>School Roll and Capacity 2015 (Source DfES 2014/15)</p> | <p>It is short sighted to focus on surplus/deficit in one particular year. The demand for school places fluctuates and could be very different in two continuous years. HCC has a statutory duty to provide sufficient places for every child in Hertfordshire; to comply with KS1 class size legislation, primary schools cannot accommodate reception or KS1 classes of over 30 due to teacher ratios and resource distribution and therefore in fulfilling its statutory duty, the County Council normally looks to increase capacity by whole forms of entry to support school organisation structures.</p> <p>In addition, a surplus of places in one area could turn into a deficit in one or two years; unpicking numbers from one particular year does not give a meaningful picture of the school place position across the area.</p> |
| Para 3.6 | <p>...In nearly all cases the planning areas were left with a surplus of places for both Year R and Year & pupils.</p> | <p>This is too simplistic in approach. Notwithstanding any errors in the Regeneris calculations, if actual figures of pupils showed a deficit, HCC would not be fulfilling its statutory duty. It must ensure all children requiring a school place are able to access one and therefore works to increase capacity where demand is expected to exceed the number of places available. As outlined above, the creation of additional places is normally in whole forms of entry to support school organisation structures (with the exception</p> |

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| | | of some rural primary schools). In addition, other factors such as faith criteria and parental choice may impact on pupil demand. |
| Para 3.7 | ... Table 3.3 and 3.4 below summarises the information and suggest that by 2019/20 there will be an anticipated surplus of 104 primary school places in Stevenage. There is also a projected surplus in primary school places in North Hertfordshire ranging from 14 in Baldock to 64 in Letchworth. | <p>Fluctuations in demand year on year are inevitable.</p> <p>As primary forecasts as based on actual pre-school aged children from GP registration data, they only project demand for Reception places four years ahead. Beyond this, children are not yet born. As such, Reception demand does not take account of the impact of strategic housing growth proposals.</p> <p>In the longer term, the County Council plans to ensure the right number of school places in the right location to meet future demand. This requires strategic planning over the long term to ensure sufficient education infrastructure is planned to meet both potential rising demand from the existing community as well as the needs of those new communities which will arise from proposed housing growth.</p> |
| Para 4.4 | North Hertfordshire and Stevenage Housing Trajectories | The two methodologies used are based on a list of assumptions, including the use of desired breakdown identified by the Local Authorities, the exclusion of a total of 2,400 dwellings which serves the East of Luton area, and the housing mix figures from past completions set out in the North Herts AMR, etc. |
| Para 4.4 (8 th bullet point) | This method was repeated for each school place planning area. Any un-allocated (i.e. windfall) sites in Stevenage were attributed 100% to the Stevenage School Place Planning Area. Any un-allocated sites in North Hertfordshire were allocated to the different School Place Planning Areas based on the proportion of dwellings proposed for each site. | It is considered that the housing mix which informs the two models is heavily based on assumptions which do not reflect the variation seen in practice. |
| Para 4.8 | The final two lines in the table show totals in the North Hertfordshire and Stevenage school planning areas based | Legislation requires all young people to stay in a designated learning environment until the age of 17 from 2013 and the age of 18 from 2015 onwards under the |

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| | on primary and secondary school age (but excludes post-16 students) | Education and Skills Bill. The 1FE= 500 dwellings general rule used by HCC includes post-16 students. These approaches are therefore not directly comparable. |
| Table 4.1 | Pupil yields based on Regeneris Housing Impact Model | Planning years are being grouped into every five years in the table; however, school planning should be scrutinized every year as one year's deficit could not be balanced out by a surplus from another year. Figures do not seem to be comparable. |
| Table 4.3 | Pupil yield assumptions table | <p>The table looks at several authorities with different dynamics, such as adjacency to London, transport links, commuter belts etc. However, the reasons for differences are not considered.</p> <p>The multipliers included in this table are used to calculate the number of children when a detailed development mix is known (e.g. size and tenure of dwellings available). When detailed information is unknown then other county councils would also use general multipliers to inform districts' local plans preparation.</p> <p>Insufficient attention is given to area differences e.g. regarding the census base used, whether peak and long term yields are accounted for, or the efficacy of the ratios in each area.</p> |
| Para 4.11 | Table 4.4 below outlines primary and secondary school pupil yields for the North Hertfordshire (only) school areas and the North Hertfordshire school areas plus Stevenage. It shows that based on the same North Hertfordshire and Stevenage housing trajectories listed above, but different assumptions for pupil yield, the number of primary school places required could vary from 3,622 places (based on Cambridgeshire County Council assumptions) to 7,403 places (Bracknell Forest assumptions) by 2031. | <p>There is no description or explanation regarding the alternative pupil yield calculators selected. Are they in fact comparable? Are they based on specific local information?</p> <p>The primary school places vary from 3,622 to 7,403 with the alternative pupil yield calculations used by Cambridgeshire County Council and Bracknell Forest Unitary Authority respectively. In this case, which alternative pupil yield calculator is the reliable one? HCC believes that each county has its own geographical character/settlement pattern/demographic distribution, etc. A multiplier that works for one county may not work for another.</p> |

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| | <p>In addition, the number of secondary school places could vary from 2,436 (Cambridgeshire County Council) to 4,958 places (Hampshire County Council) between 2011 and 2031.</p> | <p>HCC applies different models to different schemes depending on the scale, specific mix and nature of the development. However, this report has omitted these models when comparing the pupil yield to other counties.</p> |
| <p>Para 4.14</p> | <p>This method is based purely on population change. Notwithstanding this, the government’s household projections (which are based on the 2014-based SNPP) align very closely to the dwelling targets in reasonable proxy for planned growth.</p> | <p>This method should be taken out completely as there are too many variants that would affect the result of the dwelling targets as well as the population projections.</p> <p>The SHMA has identified the OAN (Objectively Assessed Need) figure for North Herts and Stevenage between 2011 and 2031.</p> <p>No other scenario should be used as the OAN number for the two districts have been agreed and concurrently included in their Local Plans as set out in the SHMA.</p> <p>The 2014-based SNPP has played its part to inform the SHMA update 2015 and should not be looked at separately.</p> |

Appendix 1f



Stevenage and North Herts Secondary School Site Search

Notes of meeting held 24 April 2017 at Vincent and Gorbing offices in Stevenage

In attendance

EHDC Claire Sime (CS) & Jenny Pierce (JP)
HCC Andrea Gilmour (AG) Dick Bowler (DB) Jacqueline Nixon (JN) & Manjinder Sehmi (MS)
NHDC Louise Symes (LS) & Nigel Smith (NS)
Pigeon Rob Snowling (RS) & Simon Butler-Finbow (SBF) (part of meeting)
SBC Richard Javes (RJ)
V&G Liz Fitzgerald (LF)
WHBC Sue Tiley (ST)

Discussion

Update on Site Search

LF provided an update on the site search and advised that two additional sites at Claypit Woods and Back Lane have been considered for which Transport Assessments (TA) have been produced.

The preferred site was Back Lane over which Pigeon have control. It is intended to promote the site through the North Herts local plan process.

Update on North Herts Local Plan

NS advised that NHDC Council on 11 April resolved to submit the local plan with minor modifications by end May 2017. Changes cannot now be made to the plan by officers.

Back Lane Site

NS advised that there are several issues with the Back Lane site. It had previously been rejected as a site in the emerging local plan because of its green belt location; its impact upon Chesfield Park; and the land promoted appears to include additional housing.

LS advised that NHDC would require justification for this green belt site being allocated as this would require demonstration of exceptional circumstances. This would need to include evidence of need for the site, and to include the timing of the proposed school opening.

Links from Stevenage to the North

RJ advised HCC that development in the Green Belt would require the clear demonstration of exceptional circumstances: this would be true both for the school and for the housing. He also confirmed that SBC would not accept the country park area [policy NH8] in the Stevenage Borough Local Plan becoming an isolated area of Green Belt disconnected from the main area of Green Belt currently immediately to its north. SBC would seek to extend public access north-south across Chesfield Park to create a walking route from Stevenage High Street to the country park at NH8 [this section already extant], to Chesfield Park and beyond to connect with the wider Green Belt. RJ made it clear that the development proposed on the Chesfield Park site could only be made acceptable to Stevenage Borough Council with these issues properly addressed.

Local Plan Allocation Site GA2

NS stated that as site GA2 includes a 4 hectare education zone, evidence would be required to demonstrate that this would not work.

AG advised that a 4 hectare education zone would not be large enough to provide the 8FE secondary school required by HCC, together with a 2FE primary school.

NS accepted that to deliver a 2FE primary and 4FE Secondary, as an all-through type school, 5 to 7ha would be required. He then agreed that this would exceed the currently proposed 4ha

allocation but that NHDC had worked to the presumption that some playing field provision may be acceptable within the Green Belt.

AG advised that discussions had been held with the promoter of site GA2 regarding the provision of land adjacent to the allocation for school playing fields. However, both HCC and the site promoter had concerns around the impact on the local highway network of the provision of an 8FE secondary school at GA2, as required by HCC, together with the 2FE primary school and 600 homes included in policy GA2. This was based on Transport Assessments that HCC and the site promoter had separately commissioned for the site.

Local Plan Examination

JN requested that NHDC cooperate with HCC in the identification of a secondary school site.

LS advised that a request could be made to the Inspector to modify the plan but that evidence would be required regarding the deliverability and timing of the school; and the education strategy demonstrating the need.

Secondary School Provision in Stevenage

NS asked when the schools would be full in Stevenage and therefore when the school to the north of the town would be required.

LF advised HCC (Children's Services) would provide the latest information. The strategy in the site search needs updating, but the principles remain in that existing schools would be expanded first and a new school would be required after 2021.

DB outlined the Compulsory Purchase Order (CPO) process for the acquisition of the Barnwell East site. Technical work is underway on the existing school sites to support the CPO.

RJ advised that the Stevenage Borough Local Plan allocation north of Stevenage [policy HO3] will necessarily come forward ahead of the site to its north in the North Herts Local Plan.

RJ felt that additional secondary school provision had the potential to assist in the identified lack of educational attainment within Stevenage.

SBF clarified that the aspirational housing does not need to be provided on the Back Lane site ahead of the school.

The order in which the allocated sites need to come forward was discussed in relation to achieving access to the school site.

Highways Matters

MS provided the views of HCC highways regarding the Back Lane site. These included concern regarding the provision of the site access under pylons; the need for pedestrian crossings on existing roads; the proposed T junction to the roundabout may need redesigning; school drop off/pick-up provision; and the cumulative implications of impact of school and proposed housing. Also, it is planned that when exiting site GA1 onto Back Lane vehicles will only be able to turn left.

Actions

- NHDC to provide a list of information required from HCC regarding the need for the secondary school to the north of Stevenage.
- Further feasibility to be undertaken for Back Lane site.
- Site Search document to be updated to include the two additional sites and the updated information on secondary schools in Stevenage.

Appendix 1g



regeneris

ECONOMICS • RESEARCH • ANALYSIS

North Hertfordshire Education Study

A Final Report by
Regeneris Consulting

North Hertfordshire District Council (NHDC)

North Hertfordshire Education Study

DRAFT

April 2017

Regeneris Consulting Ltd
www.regeneris.co.uk

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Executive Summary

- i. Regeneris has been commissioned by North Hertfordshire County Council to undertake an independent review and assessment of the likely school pupil numbers residing in North Hertfordshire and Stevenage over the Plan period (2011-2031).

Background

- ii. Following the submission of North Hertfordshire's Regulation 19 Proposed Submission Local Plan Background Consultation document, North Hertfordshire has received a number of objections from Hertfordshire County Council regarding their proposed provision of school places to accommodate the growing demand from both primary and secondary school pupils¹.
- iii. When undertaking high level school place planning related to new residential development, HCC determines child yield based on a ratio of 1 Form Entry (FE) per 500 dwellings. The application of HCCs pupil yield results in a requirement for school places at both primary and secondary school level above that derived from the population figures underpinning the emerging Plan. Due to the nature of HCCs objections and the scale of changes being sought to the Plan, NHDC wish to review the basis on which HCCs requests are made to inform the most appropriate way forward.
- iv. The pupil yield used by HCC is explained in detail in a report produced by HCC's Community, Information and Intelligence Unit² (CIU). The key points are set out in more detail in this report (see paragraph 2.2 to 2.8).
- v. In summary, HCCs objections rely on a statistically adjusted yield derived from a small number of developments across Hertfordshire based on a study that was originally undertaken for a different purpose. There is no apparent distinction made between primary and secondary school yields, despite a significant difference in the ranges between the two. Furthermore, the information on which this has been based is somewhat out of date.

Future Growth

- vi. In order to test Hertfordshire County Council's assumptions on pupil yields, we have considered the potential growth in primary and secondary school pupils in North Hertfordshire and Stevenage over the plan period (2011-2031) using three alternative methodologies. The alternative methodologies are summarised below and the first two of these takes into account future housing trajectories:
 - Regeneris' Housing Impact Model – a bespoke model which considers the type and mix of housing arising from the proposed development of new housing across the area in order to derive a child population.
 - Pupil yield calculators from elsewhere – we apply pupil yield ratios from neighbouring and similar authorities to the housing trajectories and compare the outputs with HCC's own pupil yield ratio.

¹ Representations to North Hertfordshire on Regulation 19 Proposed Submission Local Plan Consultation Document, Hertfordshire County Council, November 2016

² Primary and Secondary Pupil Yields in New Housing Developments in Hertfordshire, HCC Community Information and Intelligence Units, February 2015

- Sub-National Population Projections (SNPP) 2014-based – we consider the population projections that underpin North Hertfordshire’s Objectively Assessed Need (OAN) for housing and the maximum primary and secondary pupil population which arise from SNPP 2014.
- vii. The results using these methodologies are summarised in Table 1.1 below and the key points to note are as follows:

Primary school places

- When applying the HCC pupil yield ratio to both the North Hertfordshire and Stevenage housing trajectories, the outcome is significantly higher than when applying all other alternative pupil yields examined in this report.
- Overall, for North Herts and Stevenage collectively, alternative models used in this report point towards a requirement of between 3,622 and 7,403 primary school places (compared to a higher figure of 8,208 suggested when applying HCC’s pupil yield ratio). An average of the alternative figures would suggest a requirement for 6,057 primary school places.
- For North Hertfordshire alone, alternative models point towards a requirement of between 2,178 and 3,875 primary school places. All of these are significantly below the figure suggested when applying HCC’s pupil yield ratio (4,498).
- For Stevenage alone, alternative models point towards a requirement of between 1,444 and 3,870 primary school places. For Stevenage, the figure based on HCC’s pupil yield ratio (3,710) is towards the upper end of the range identified above. It is worth noting however, the highest pupil yields for Stevenage using alternative models were derived from those that do not differentiate between unit size and type in their method.

Secondary school places

- As with primary school pupils, the application of HCC’s pupil yield ratio for secondary school aged children derives a significantly higher outcome than the application of alternative pupil yield ratios used by other local authorities.
- Overall, for North Herts and Stevenage collectively, alternative models examined in this report point towards a requirement of between 2,436 and 4,958 secondary school places (compared to a figure of 5,863 forecast by HCC). An average of the alternative figures would suggest a requirement for 4,023 secondary school places.
- For North Hertfordshire alone, alternative models point towards a requirement of between 1,469 and 2,249 secondary school places. All of these are significantly below the figure suggested by HCC’s pupil yield ratio (3,213).
- For Stevenage alone, alternative models point towards a requirement of between 967 and 2,709 secondary school places. For Stevenage, the figure based on HCC’s pupil yield ratio (2,650) is towards the upper end of the range identified above.

Table 1.1 Comparison of pupil yields for North Hertfordshire and Stevenage based on different methodologies

| | Primary Schools | | | Secondary Schools | | |
|--------------------------------|-----------------|------------------------|---------------------|-------------------|------------------------|---------------------|
| | North Herts* | Stevenage [±] | Total ^{±±} | North Herts* | Stevenage [±] | Total ^{±±} |
| Regeneris Housing Impact Model | 2,324 | 2,498 | 4,822 | 1,560 | 1,661 | 3,221 |
| Bracknell Forest | 3,875 | 3,529 | 7,403 | 1,952 | 1,534 | 3,486 |
| Cambridgeshire County Council | 2,178 | 1,444 | 3,622 | 1,469 | 967 | 2,436 |
| Central Bedfordshire | 2,999 | 3,612 | 6,610 | 2,142 | 2,580 | 4,722 |
| Essex County Council | 2,827 | 2,893 | 5,720 | 1,884 | 1,929 | 3,813 |
| Hampshire County Council | 3,213 | 3,870 | 7,082 | 2,249 | 2,709 | 4,958 |
| Oxfordshire County Council | 2,677 | 3,225 | 5,902 | 2,142 | 2,580 | 4,722 |
| SNPP 2014** | 2,916 | 1,524 | 4,440 | 1,653 | 824 | 2,477 |
| Hertfordshire County Council | 4,498 | 3,710 | 8,208 | 3,213 | 2,650 | 5,863 |

* please note: this refers to the North Hertfordshire School Place Planning Areas and not the North Hertfordshire administrative area.

± please note: this refers to the Stevenage School Place Planning Areas and not the Stevenage administrative area.

±± please note: this refers to all School Place Planning Areas (ie. North Hertfordshire + Stevenage School Place Planning Areas).

**please note that pupil yield figures for North Hertfordshire and Stevenage based on the 2014-based Sub-National Population Projections are for administrative boundaries. This is because the 2014-based SNPP forecasts population change only at the Local Authority area.

1. Introduction

- 1.1 Following the submission of North Hertfordshire's Regulation 19 Proposed Submission Local Plan Consultation document, North Hertfordshire has received a number of objections from Hertfordshire County Council regarding their proposed provision of school places to accommodate the growing demand from both primary and secondary school pupils³. The objections predominantly focus on the likely level of demand for school places arising from new housing developments that are permitted or allocated throughout the Plan period and that form North Hertfordshire's housing trajectory. There are also a number of concerns raised about the impact of school place demand in North Hertfordshire arising from new housing developments within Stevenage.
- 1.2 Regeneris has been commissioned by North Hertfordshire County Council to undertake an independent review and assessment of the likely school pupil numbers residing in North Hertfordshire and Stevenage over the Plan period (2011-2031). The key objectives of the study are to:
- Objectively review the approach used by Hertfordshire County Council in deriving pupil yields which underpin their objections to the Proposed Submission Local Plan Consultation document
 - Review the current number of school pupils in the school system and assess the likely impact on future demand
 - Undertake an independent assessment of the likely future demand for school places, both primary and secondary, arising from the planned and allocated new development set out in the North Hertfordshire and Stevenage school trajectories
 - Compare the outcome of this assessment with approaches used elsewhere, in neighbouring and characteristically similar authorities
 - Provide a likely range of forecast requirements for school places in North Hertfordshire and Stevenage throughout the plan period

³ Representations to North Hertfordshire on Regulation 19 Proposed Submission Local Plan Consultation Document, Hertfordshire County Council, November 2016

2. Study Context

Background

- 2.1 In November 2016 Hertfordshire County Council submitted Representations on the North Hertfordshire Regulation 19 Proposed Submission Local Plan Consultation document. At paragraph 4.2 of the representations it is stated “HCC consider that the District Council has failed to include sufficient school places to meet the needs arising from the increasing population that will arise from the housing development included in the emerging local plan”. It goes on to state that: “HCC consider that NHDC has not met the requirements of the existing and new population in the following strategic locations:
- SP14: Site BA1 – North of Baldock
 - SP15: Site LG1 – North of Letchworth Garden City
 - SP16: Site NS1 – North of Stevenage
 - SP18: Site GA2 – Land off Mendip Way, Great Ashby
 - SP19: Sites EL1, EL2 and EL3 – East of Luton”
- 2.2 HCC go on to make further detailed representations on each of the above strategic sites and in so doing use their pupil yield calculator to determine the level of primary and secondary school places required for each site or community and compare this with the level of provision proposed by NHDC in the emerging local plan.
- 2.3 The pupil yield from new housing developments relied upon by HCC is referred to at paragraph 1.16-1.19 of Appendix A of their Representations, and states: “When undertaking high level school place planning related to new residential development, HCC determines child yield based on a ratio of **1 Form Entry (FE⁴) per 500 dwellings** to be 97.5% confident of not underestimating yield”.
- 2.4 Taking Site BA1 as an example, Policy SP14 refers to additional 6FE primary-age and secondary-age school provision as part of an overall masterplan to be prepared for the site. However, HCC object to this level of provision and instead suggest that the 3,600 homes proposed in Baldock would yield demand for 7.2 FE of school places (3,600/500) and on this basis a pattern of new primary school sites to accommodate 8FE in total and a new 8FE secondary school site should be provided.
- 2.5 The application of HCCs pupil yield results in a requirement for school places at both primary and secondary school level above that derived from the population figures underpinning the plan. NHDC accept that there may be differences between population projections and the actual yields realised from new development. However, they consider the emerging local plan contains sufficient actual and contingent requirements to meet HCCs purported requirements. Due to the nature of HCCs objections and the scale of changes being sought to the plan, NHDC wish to review the basis on which HCCs requests are made to inform the most appropriate way forward. It is therefore helpful to review the background and origin of the pupil yield relied upon by HCC.

⁴ 1 Form Entry (FE) equals 30 places per year group. Primary schools have 7 year groups from Year R to Year 6 (210 pupils) and Secondary schools have 5 year groups from Year 7 to Year 11 (150 pupils) plus a sixth form (Years 11 and 12).

HCC's Pupil Yield

2.6 The pupil yield used by HCC is explained in detail in a report produced by HCC's Community, Information and Intelligence Unit⁵ (CIIU). The key points of note are as follows:

- The yield is based on results from a survey of 45 Hertfordshire developments undertaken by HCC's demographer in 2008 for a separate body of research and was therefore not a purpose built survey.
- According to the CIIU report, which was produced in 2015, "greater than sixty percent of the developments included in the survey were completed more than ten years ago (prior to 2005) and thirty percent were more than twenty years ago (prior to 1995) – some as much as fifty years ago.
- The sample size was considered to be statistically robust at County level but it was noted there were significant variations in pupil yields across the districts within Hertfordshire, predominantly as a result of the small number of developments included within the study in some districts. A total of three (6.6%) developments were surveyed in North Hertfordshire.
- The developments were "*reported to be mixed in terms of dwelling type, tenure and size although data relating to these parameters was not collected*". The resulting pupil yields are therefore not variable by dwelling size.
- Primary and secondary pupil yields were calculated for all developments as well as separately for those completed within the last ten years (of which there were fifteen), as follows:
 - The average countywide **primary** pupil yield resulting from all 45 developments was 23.8 pupils per 100 dwellings, and 23.2 pupils per 100 dwellings for <10 year developments
 - The average countywide **secondary** pupil yield resulting from all 45 developments was 17 pupils per 100 dwellings, and 11.8 pupils per 100 dwellings for <10 year developments (this includes a post 16 component).
- These **yields are then adjusted** using standard deviation to ensure a 97.5% confidence level of not under-estimating the yield of pupils arising from new developments. Or, in other words, the adjusted yield would only be exceeded by 2.5% of the observed distribution. This results in a near doubling of the above ratios, with the **adjusted primary school** pupil yield ranging from **40.8 to 42.8 pupils per 100 dwellings** and the adjusted **secondary school pupil** yield ranging from **24 to 34.8 pupils per 100 dwellings**. In practice, if 10 new primary schools were built to accommodate the additional demand arising from 10,000 new dwellings⁶ the schools could be under-subscribed by around 55%.
- The CIIU report goes on to state that, on average, one FE at primary stage (210 pupils) would be generated from between 880 dwellings (based on the unadjusted yield from all 45 developments of 23.8 pupils) and 490 dwellings (based on the adjusted yield of 42.8 pupils from <10 years old developments). The report notes that "*applying a one Form of Entry arising from the latter number of dwellings minimises the risk to the authority of under predicting pupil yield arising from new developments*".

⁵ Primary and Secondary Pupil Yields in New Housing Developments in Hertfordshire, HCC Community Information and Intelligence Units, February 2015

⁶ Using the ratio of 42.8 pupils per 100 dwellings and assuming 2FE schools (420 pupils per school)

- The same calculation is not done for secondary school pupils within the CIU report. However, if it were, the results would range from one FE at secondary stage generated from between 1,235 dwellings (based on the unadjusted yield from all 45 developments of 17 pupils) and 600 dwellings (based on the adjusted yield of 34.8 pupils from all 45 developments).
- 2.7 The limitations of the 2008 survey data in relation to establishing pupil yields are clearly set out in the CIU 2015 report, particularly within the concluding remarks of the report (page 36). Nonetheless, the foreword statement (page i) suggests “Overall, findings from the research conducted supported the original yield results, which have concluded a range of 500-850 dwellings per one FE at primary level would provide 97.5% confidence of not underestimating child yield, and demonstrated this range is still applicable”.
- 2.8 In HCC’s Objections to NHDC’s emerging local plan they rely on the upper end of this range (1 FE per 500 dwellings based on the adjusted yield derived from the fifteen developments completed in the last ten years). There is no clear distinction made between primary and secondary school yields, despite the difference in ranges we have highlighted.

HCC’s Pupil Yield in Context

- 2.9 It is helpful to set HCCs pupil yield ratio in the context of NHDCs housing trajectory and the population projections which have under-pinned NHDC’s Objectively Assessed Housing Need.
- 2.10 Table 2.1 below summarises the outcome of the HCC pupil yield ratio (1 FE per 500 new dwellings) when applied to the local authority housing trajectories of North Hertfordshire and Stevenage, compared to the peak growth levels in primary school age children derived from the 2014-based Sub-National Population Projections (SNPP).

Table 2.1 Primary School Age Children, 2011-2031

| | Housing Trajectory Total 2011-2031 | HCC Pupil Yield Ratio | HCC Pupil Yield | 2014-SNPP peak growth in primary aged children | Difference (%) |
|--------------|------------------------------------|---|-------------------------|--|----------------------|
| N.Herts LA | 16,900 ⁷ | 0.42 | 7,100 (33.8 FEs) | 2,916 (14 FEs) | 4,182 (+143%) |
| Stevenage LA | 7,600 | 0.42 (0.25 for TC developments ⁸) | 2,680 (12.8 FEs) | 1,520 (7 FEs) | |
| Total | 21,600 | 0.42 | 9,780 (46.5 FEs) | 4,440 (21 FEs) | 5,340 (+120%) |

Source: SNPP-2014; NHDC; Regeneris

- 2.11 For both North Hertfordshire and Stevenage, the HCC pupil yield derives a number of primary school pupils that is more than double that of number derived from the population projections. This is a considerable difference that needs to be explored further.

⁷ This includes windfall and broad location developments

⁸ HCC have accepted the use of a lower ratio (1FE:850 dwellings) for town centre developments in Stevenage

3. Baseline

- 3.1 In this section we look at the current number of children in the school system in North Hertfordshire and Stevenage in order to understand how the current numbers might compare to those forecast in the future.
- 3.2 Table 3.1 below sets out the pupil numbers on school roll, as of 2015 (latest available), in each year group and in each of the secondary school place planning areas that fall entirely within North Hertfordshire, as well as the Stevenage school place planning areas⁹. It also shows the total capacity within each school place planning area and the extent of the surplus or deficit.

Table 3.1 School Roll and Capacity 2015

| Primary | Yr R | Yr 1 | Yr 2 | Yr 3 | Yr 4 | Yr 5 | Yr 6 | Total | Total Capacity | Surplus/Deficit |
|------------|-------|-------|-------|-------|-------|-------|-------|-------|----------------|-----------------|
| Baldock | 224 | 215 | 240 | 212 | 217 | 224 | 216 | 1,548 | 1,598 | 50 |
| Hitchin | 576 | 572 | 550 | 567 | 498 | 500 | 528 | 3,791 | 4,204 | 413 |
| Letchworth | 397 | 400 | 359 | 348 | 353 | 367 | 360 | 2,584 | 2,744 | 160 |
| Royston | 235 | 238 | 210 | 208 | 193 | 167 | 181 | 1,432 | 2,223 | 791 |
| Stevenage | 1,375 | 1,274 | 1,299 | 1,268 | 1,152 | 1,114 | 1,116 | 8,598 | 9,798 | 1,200 |

| Secondary | Yr 7 | Yr 8 | Yr 9 | Yr 10 | Yr 11 | Yr 12 | Yr 13 | Total Yr 7-13 | Total Capacity | Surplus/Deficit |
|------------|-------|-------|-------|-------|-------|-------|-------|---------------|----------------|-----------------|
| Baldock | 210 | 209 | 212 | 208 | 195 | 110 | 112 | 1,256 | 1,350 | 316 |
| Hitchin | 516 | 508 | 515 | 478 | 481 | 362 | 288 | 3,148 | 3,207 | 709 |
| Letchworth | 244 | 239 | 290 | 308 | 326 | 197 | 139 | 1,743 | 2,594 | 1,187 |
| Royston | 161 | 141 | 129 | 117 | 152 | 49 | 30 | 779 | 1,580 | 880 |
| Stevenage | 1,177 | 1,076 | 1,092 | 1,182 | 1,067 | 725 | 646 | 6,965 | 9,186 | 3,592 |

Source: DfES 2014/15

- 3.3 The data set out in Table 3.1 above indicates that as of 2015, there was a total of 8,598 primary school aged children on the school roll in Stevenage against a capacity of 9,798 leading to a surplus in places of 1,200. For planning areas in North Hertfordshire, the surplus in places ranged from 50 in Baldock to 413 in Hitchin.
- 3.4 There was also a surplus of places in each of the planning areas for secondary school pupils, with a total surplus of 3,592 for Stevenage and surpluses ranging from 316 in Baldock to 1,187 in Letchworth.
- 3.5 With the exception of the Stevenage planning area, the number of pupils on roll in year R is higher than the number of pupils on roll in Year 7 indicating the demand for secondary school places arising from the current population is likely to increase as the population ages.
- 3.6 Table 3.2 shows the data from the latest available HCC primary and secondary school area forecasts. The data shows the actual number of school admissions in Year R (primary schools) and Year 7 (secondary) schools for each planning area, together with capacity for 2014/15 and 2015/16. In nearly all cases the planning areas were left with a surplus of places for both Year R and Year & pupils.

⁹ We have only included data for those planning areas which lie wholly within North Hertfordshire. It is important to note that school place planning areas are not consistent with local authority boundaries and therefore not comparable with data set out in the previous chapter.

| Planning Area | Primary (Yr R) | | Secondary (Yr 7) | |
|-----------------------|----------------|---------|------------------|---------|
| Capacity | 2014/15 | 2015/16 | 2014/15 | 2015/16 |
| Letchworth | 420 | 420 | 330 | 330 |
| Baldock | 222 | 222 | 210 | 210 |
| Hitchin | 626 | 626 | 540 | 540 |
| Royston (yr R) | 290 | 290 | 213 | 213 |
| Royston Middle (yr 5) | N/A | N/A | 210 | 210 |
| Royston Upper (yr 9) | N/A | N/A | 330 | 330 |
| Stevenage | 1440 | 1440 | 1366 | 1366 |
| Admissions | 2014/15 | 2015/16 | 2014/15 | 2015/16 |
| Letchworth | 397 | 404 | 244 | 267 |
| Baldock | 224 | 219 | 210 | 209 |
| Hitchin | 576 | 576 | 516 | 551 |
| Royston | 235 | 253 | 129 | 114 |
| Royston Middle (yr 5) | N/A | N/A | 145 | 158 |
| Royston Upper (yr 9) | N/A | N/A | 244 | 267 |
| Stevenage | 1,375 | 1,415 | 1,177 | 1,179 |
| Surplus/Deficit | 2014/15 | 2015/16 | 2014/15 | 2015/16 |
| Letchworth | 23 | 16 | 86 | 63 |
| Baldock | -2 | 3 | 0 | 1 |
| Hitchin | 50 | 50 | 24 | -11 |
| Royston | 55 | 37 | 84 | 99 |
| Royston Middle (yr 5) | N/A | N/A | 65 | 52 |
| Royston Upper (yr 9) | N/A | N/A | 86 | 63 |
| Stevenage | 65 | 25 | 189 | 187 |

Source: HCC

- 3.7 HCC also make projections for future demand and capacity in primary and secondary school places. Table 3.3 and 3.4 below summarises the information and suggest that by 2019/20 there will be an anticipated surplus of 104 primary school places in Stevenage. There is also a projected surplus in primary school places in North Hertfordshire ranging from 14 in Baldock to 64 in Letchworth.
- 3.8 Projections for secondary school places are done so over a longer period of time, up to 2026/27. The projections indicate a more varied pattern of demand throughout the time period but with deficits arising in some areas almost immediately (Baldock and Hitchin). By 2026/27 it is anticipated there will be a small surplus in places in Letchworth and Royston but a deficit in other planning areas.

| | 2016/17 | 2017/18 | 2018/19 | 2019/20 |
|------------|---------|---------|---------|---------|
| Letchworth | 17 | -26 | -1 | 50 |
| Baldock | -2 | 28 | 29 | 14 |
| Hitchin | 20 | 19 | 5 | 30 |
| Royston | 16 | 39 | 43 | 64 |
| Stevenage | -12 | 104 | 83 | 104 |

Source: HCC

Table 3.4 Year 7 Forecasts (surplus/Deficit)

| | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 |
|----------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| Letchworth | 54 | 70 | 59 | 54 | 38 | 34 | 19 | 9 | 7 | 16 | 42 |
| Baldock | -6 | -5 | -7 | -35 | -36 | -53 | -67 | -75 | -59 | -57 | -56 |
| Hitchin | -3 | -31 | -91 | -104 | -130 | -158 | -170 | -213 | -188 | -196 | -155 |
| Royston (yr 9) | 84 | 86 | 86 | 71 | 51 | 47 | 33 | 30 | 23 | 12 | 22 |
| Royston (yr 5) | 31 | 34 | 13 | 4 | -11 | -36 | -26 | -13 | 3 | -16 | 0 |
| Stevenage | 184 | 169 | 32 | -11 | -21 | -138 | -195 | -245 | -178 | -169 | -140 |

Source: HCC

- 3.9 The above data indicates that whilst there is a current surplus across all school planning areas in the total number of primary and secondary school children, there is forecast to be a deficit in year 7 secondary school places going forward. This deficit needs to be considered alongside potential further demand for places arising from planning developments that aren't already included in HCC's projections of future demand.

4. Future Growth

Introduction

- 4.1 In this section of the report we consider the potential growth in primary and secondary school pupils arising from the development of new housing in both North Hertfordshire and Stevenage over the plan period (2011-2031). This has been based on the most up to date housing trajectories supplied by each local authority.
- 4.2 In order to consider the future growth in school pupils, we use the following three methodologies, which allow us to compare and scenario test our findings:
- Regeneris' Housing Impact Model – a bespoke model which considers the type and mix of housing within each development of the trajectories in order to derive a child population
 - Alternative Pupil yield calculators– we apply pupil yield ratios from neighbouring and similar authorities to the housing trajectories and compare the outputs with HCC's own pupil yield ratio
 - Sub-National Population Projections (SNPP) 2014-based – we consider the population projections that underpin North Hertfordshire's Objectively Assessed Need (OAN) for housing and the maximum primary and secondary pupil population which arise from SNPP 2014
- 4.3 Where possible, our findings are reported at both district and School Place Planning Area level.

North Hertfordshire and Stevenage Housing Trajectories

- 4.4 The housing trajectories of both North Hertfordshire and Stevenage have been used in the first two of the methodologies described above. However, as is often the case with housing trajectories that span the plan period (20 years) there is limited readily available detail in terms of the mix (no. of bedrooms) and type (flats or houses) of units within each development. In order to add this level of detail to each of the trajectories we have taken the following steps:
- Where the level of detail is known, we have included this. In reality there were very few instances where all the information required (ie. number of 1-2 bedrooms or 3+ bedrooms, and breakdown by flat and/or house) was available.
 - Where the proportions of 1-2 bedroom and 3+ bedroom units were unknown, a ratio of 40%:60% respectively was used for North Hertfordshire, and 60%:40% respectively was used for Stevenage Borough Council. This is based on the desired breakdown identified by the Local Authorities in their respective proposed submission local plan documents¹⁰.
 - Where it was known that a certain development would be delivered as flats, it was assumed that all (ie. 100%) units would be 1 to 2 bedroom units.
 - Once the proportion of 1-2 bedroom and 3+ bedroom units were identified, we identified housing mix by number of bedrooms (1-5 bedrooms) and dwelling type (ie. whether the dwelling would be a house or flat). For North Hertfordshire, it was assumed that of all 1-2 bedroom units: 1-in-8 units would be 1-bed flat, 1-in-4 units would be 2-bed flats, and the rest (c. 60%) would be 2-bed houses. This breakdown is based on recent urban extension

¹⁰ These assumptions are based on Policy HS3 of the emerging North Hertfordshire District Council Local Plan, and Policy HO9 of the emerging Stevenage Local Plan respectively.

developments in North Hertfordshire, and draws on the breakdown suggested by the Council's housing policy¹¹.

- For all 3+ bedroom units in North Hertfordshire, it was assumed that around 1-in-2 units would be 3-bedroom houses, 1-in-3 units would be 4-bedroom house, and the rest (c. 20% would be 5+ bedroom units). This breakdown is based on recent urban extension developments in North Hertfordshire, and draws on the breakdown suggested by the Council's housing policy¹¹.
- For Stevenage and East Hertfordshire, the detailed housing mix drew on the assumption that 60% of all units would be smaller units (ie. 1-2 bedroom) together with data from the 2011 Census of Population (based on breakdown of 1 and 2-bedroom flats and 2-bedroom dwellings, as well as breakdown of 3, 4 and 5--bedroom dwellings).
- For the 2011 to 2016 period, the housing trajectory was based on the number of dwellings delivered each year. The North Hertfordshire figures are based on housing mix figures from past completions set out in the district's AMRs. For Stevenage, detailed information was not available in the AMRs, and as such the same assumptions described above were used.
- This method was repeated for each school place planning area. Any un-allocated (ie. windfall) sites in Stevenage were attributed 100% to the Stevenage School Place Planning Area. Any un-allocated sites in North Hertfordshire were allocated to the different School Place Planning Areas based on the proportion of dwellings proposed for each site.

Regeneris Housing Impact Model

- 4.5 Having established a detailed housing mix for each of the school place planning areas (ie. 1-bed flat, 2-bed flat, 2-bed house, etc.) the data was then analysed using Regeneris' in-house Housing Impact Model. This model draws on the *Survey of English Housing* from DCLG which estimates mean household sizes for different house types. Using these assumptions, it is then possible to estimate the number of additional people (ie. all ages) that could live within each school place planning area.
- 4.6 Once an overall population is established, the number of children (by single year of age) is estimated for each year of the housing trajectory (2011-2031) based on the 2014-based Sub-National Population Projections.
- 4.7 The table below summarises pupil yields for each of the school place planning areas in the North Hertfordshire and Stevenage area. The figures in the table below represent the (maximum) number of additional pupil places required as a result of the new housing delivered over each five-year period. These figures do not consider any time lag that might occur between homes being built and people moving in. Furthermore, it is assumed that the pupil yield generated by the new dwellings is (net) additional to current demand.
- 4.8 For Royston, we split pupil yields based on lower, middle and upper school arrangements, rather than the primary and secondary school arrangements seen elsewhere. The final two lines in the table show totals in the North Hertfordshire and Stevenage school planning areas based on primary and secondary school age (but excludes post-16 students).

¹¹ Please note that the Luton East allocation (ie. EL1, EL2 and EL3) have been excluded from the North Hertfordshire (and Hitchin planning area) housing mix as this scheme is being planned to be self-contained in terms of education, and will predominantly address unmet needs from Luton. This means that our housing trajectory exclude 2,100 dwellings from North Hertfordshire's housing trajectory. We have also excluded a small (30-dwelling) allocation from North Hertfordshire's housing trajectory as this development (allocation LG17) will replace elderly persons' housing, and will not be generating additional demand.

Table 4.1 Pupil yields based on Regeneris Housing Impact Model

| | | 2011-16 | 2016-21 | 2021-26 | 2026-31 | Total |
|--------------------------------------|------------------------|---------|---------|---------|---------|-------|
| Baldock | Primary | 51 | 136 | 327 | 333 | 847 |
| | Secondary | 36 | 85 | 223 | 231 | 575 |
| Harpenden | Primary | 2 | 21 | 4 | 0 | 26 |
| | Secondary | 1 | 13 | 3 | 0 | 17 |
| Hitchin | Primary | 32 | 203 | 250 | 48 | 533 |
| | Secondary | 22 | 127 | 171 | 33 | 354 |
| Letchworth | Primary | 26 | 134 | 124 | 158 | 442 |
| | Secondary | 19 | 84 | 86 | 110 | 298 |
| Royston | Lower (4-9 years) | 17 | 104 | 98 | 60 | 279 |
| | Middle (9-13 years) | 13 | 77 | 78 | 47 | 214 |
| | Upper (13-16 years) | 10 | 53 | 54 | 35 | 151 |
| Welwyn Garden City | Primary | 5 | 27 | 23 | 34 | 90 |
| | Secondary | 4 | 17 | 15 | 23 | 60 |
| Stevenage School Planning Areas | Primary | 274 | 718 | 914 | 592 | 2,498 |
| | Secondary | 190 | 443 | 619 | 409 | 1,661 |
| North Herts School Planning Areas | Primary* | 139 | 664 | 865 | 657 | 2,324 |
| | Secondary [±] | 98 | 416 | 591 | 456 | 1,560 |
| Total (All School Planning Areas) | Primary* | 413 | 1,382 | 1,779 | 1,248 | 4,822 |
| | Secondary [±] | 288 | 858 | 1,210 | 865 | 3,221 |

*Please note: this includes pupils aged 4-11 years (ie. of primary school age) in Royston.

±Please note: this includes pupils aged 11-16 years (ie. of secondary school age) in Royston.

Source: Regeneris Consulting, 2017; Calculations based on housing trajectories for North Hertfordshire DC and Stevenage BC for period 2011-31; ONS, Census of Population, 2011; ONS, Sub-National Population Projections, 2014; DCLG, Survey of English Housing, 2007

Alternative Pupil Yield Calculators

- 4.9 Using the housing trajectories for North Hertfordshire and Stevenage, Regeneris applied the HCC's pupil yield ratio (ie. 1 form entry per 850 town centre units, and 1 form entry per 500 dwellings across the rest of the study area) for each school place planning area in the study area. Table 4.2 below shows the outcome for primary and secondary school pupils for the North Hertfordshire school areas (ie. Baldock, Harpenden, Hitchin, Letchworth, Royston and Welwyn Garden City) and the North Hertfordshire and Stevenage study area for 2011-2031¹². It shows, according to HCC's pupil yields, that 8,208 primary school places, and 5,863 secondary school places will be required by 2031.

| | | 2011-16 | 2016-21 | 2021-26 | 2026-31 | Total |
|-----------------------------------|-----------|---------|---------|---------|---------|-------|
| North Herts School Planning Areas | Primary | 292 | 1,262 | 1,665 | 1,278 | 4,498 |
| | Secondary | 209 | 901 | 1,189 | 913 | 3,213 |
| Stevenage School Planning Areas | Primary | 372 | 1,106 | 1,359 | 873 | 3,710 |
| | Secondary | 266 | 790 | 971 | 624 | 2,650 |
| Total (All School Planning Areas) | Primary | 664 | 2,368 | 3,024 | 2,151 | 8,208 |
| | Secondary | 474 | 1,692 | 2,160 | 1,537 | 5,863 |

Source: Regeneris Consulting, 2017; Calculations based on method for calculating pupil yield based on ratios suggested by Hertfordshire County Council.

- 4.10 Regeneris has also tested the implications of using different pupil yield assumptions from other local authority areas. The table below lists the pupil yield assumptions used by the different local authorities, as well as their respective sources.

¹² Detailed tables are included in Appendix A.

Table 4.3 Pupil yield assumptions

| | Primary School pupil yield | Secondary School pupil yield | Source |
|-------------------------------|---|---|--|
| Bracknell Forest | <ul style="list-style-type: none"> • 1 bedroom – 0.00 per dwelling • 2 bedrooms – 0.15 per dwelling • 3 bedrooms – 0.58 per dwelling • 4 bedrooms – 0.43 per dwelling • 5 bedrooms – 0.62 per dwelling | <ul style="list-style-type: none"> • 1 bedroom – 0.00 per dwelling • 2 bedrooms – 0.05 per dwelling • 3 bedrooms – 0.17 per dwelling • 4 bedrooms – 0.35 per dwelling • 5 bedrooms – 0.43 per dwelling | <i>Planning Obligations, Supplementary Planning Document, February 2015</i> |
| Cambridgeshire County Council | <p>Market & intermediate housing:</p> <ul style="list-style-type: none"> • 2 bedrooms – 0 per 100 dwellings • 3 bedrooms – 20 per 100 dwellings • 4 bedrooms – 40 per 100 dwellings <p>Social rent:</p> <ul style="list-style-type: none"> • 2 bedrooms – 15 per 100 dwellings • 3 bedrooms – 80 per 100 dwellings • 4 bedrooms – 120 per 100 dwellings | <p>Market & intermediate housing:</p> <ul style="list-style-type: none"> • 2 bedrooms – 0 per 100 dwellings • 3 bedrooms – 15 per 100 dwellings • 4 bedrooms – 30 per 100 dwellings <p>Social rent:</p> <ul style="list-style-type: none"> • 2 bedrooms – 0 per 100 dwellings • 3 bedrooms – 40 per 100 dwellings • 4 bedrooms – 90 per 100 dwellings | <i>Revisions to child yield multipliers for new developments, September 2015</i> |
| Central Bedfordshire | 0.04 pupils, per year group, per dwelling (ie. 4 pupils per year group per 100 dwellings) | | <i>The Planning Obligations Strategy, Consultation Draft, July 2015</i> |
| Essex County Council | <ul style="list-style-type: none"> • One bed – 0.00 per unit • Flats – 0.15 per unit • Houses – 0.3 per unit | <ul style="list-style-type: none"> • One bed – 0.00 per unit • Flats – 0.10 per unit • Houses – 0.20 per unit | <i>The Essex County Council Developers' Guide to Infrastructure Contributions, 2015</i> |
| Hampshire County Council | 0.30 children per dwelling | 0.21 children per dwelling | <i>Developers' Contributions towards Children's Services Facilities, November 2016</i> |
| Oxfordshire County Council | 400 homes would generate a need for approx. 100 primary places | 400 homes would generate a need for approx. 80 secondary place | <i>South Oxfordshire Submission Core Strategy Infrastructure Delivery Plan, Rest of the District, March 2011</i> |

- 4.11 Table 4.4 below outlines primary and secondary school pupil yields for the North Hertfordshire (only) school areas and the North Hertfordshire school areas plus Stevenage. It shows that based on the same North Hertfordshire and Stevenage housing trajectories listed above, but different assumptions for pupil yield, the number of primary school places required could vary from 3,622 places (based on Cambridgeshire County Council assumptions) to 7,403 places (Bracknell Forest assumptions) by 2031. In addition, the number of secondary school places could vary from 2,436 (Cambridgeshire County Council) to 4,958 places (Hampshire County Council) between 2011 and 2031.
- 4.12 It is interesting to note the highest yields for Stevenage are derived from those methods which do not differentiate between unit type and size (ie. Hampshire and Central Bedfordshire) and are therefore potentially masking the likely lower impacts on pupil yields of the relatively high number of smaller units/flatted developments that are included within Stevenage’s housing trajectory.
- 4.13 In summary, the application of pupil yield ratios from other local authorities demonstrates a yield for both primary and secondary school pupils that is considerably lower than when using the HCC’s assumptions. Detailed tables showing primary and secondary school pupil yield for each school planning area are included in the Appendix at the end of this study.

Table 4.4 Primary and secondary school pupil yields based on alternative pupil yield calculations

| | Primary School | | | Secondary School | | |
|-------------------------------|----------------|------------------------|---------------------|------------------|------------------------|---------------------|
| | North Herts* | Stevenage [±] | Total ^{±±} | North Herts* | Stevenage [±] | Total ^{±±} |
| Bracknell Forest | 3,875 | 3,529 | 7,403 | 1,952 | 1,534 | 3,486 |
| Cambridgeshire County Council | 2,178 | 1,444 | 3,622 | 1,469 | 967 | 2,436 |
| Central Bedfordshire | 2,999 | 3,612 | 6,610 | 2,580 | 2,142 | 4,722 |
| Essex County Council | 2,827 | 2,893 | 5,720 | 1,884 | 1,929 | 3,813 |
| Hampshire County Council | 3,213 | 3,870 | 7,082 | 2,249 | 2,709 | 4,958 |
| Oxfordshire County Council | 2,677 | 3,225 | 5,902 | 2,142 | 2,580 | 4,722 |

Source: Regeneris Consulting, 2017; Based on assumptions on pupil yield for different local authorities listed above and housing trajectories for North Hertfordshire and Stevenage.

*please note: this refers to the North Hertfordshire School Place Planning Areas and not the North Hertfordshire administrative area.

±please note: this refers to the Stevenage School Place Planning Areas and not the Stevenage administrative area.

±± please note: this refers to all School Place Planning Areas (ie. North Hertfordshire + Stevenage School Place Planning Areas).

Population Projections

- 4.14 In June 2016, the Office for National Statistics (ONS) released the 2014-based Sub-National Population Projections which project population change to 2039. This section looks at population change in North Hertfordshire and Stevenage between 2011 and 2031 to estimate pupil yield. This method is based purely on population change. Notwithstanding this, the government’s household projections (which are based on the 2014-based SNPP) align very closely to the dwelling targets in the authorities’ respective emerging plans. These population figures can therefore be seen as a reasonable proxy for planned growth.
- 4.15 The table below shows that for the period 2011 to 2031, the 2014-based population projections suggest there will be an additional 4,440 primary school aged children and an additional 2,477 secondary school aged children residing in both North Hertfordshire and Stevenage (local authority areas).
- 4.16 The 2014-based population projections are not available at small area level and as such it is not possible to carry out the same analysis for each school planning area.

Table 4.5 Pupil yield based on 2014-based population projections

| | Primary School | Secondary |
|------------------------|----------------|-----------|
| North Hertfordshire* | 2,916 | 1,653 |
| Stevenage [±] | 1,524 | 824 |
| Total ^{±±} | 4,440 | 2,477 |

Source: Regeneris Consulting, 2017 based on 2014-based Sub-National Population Projections, 2016.

*please note: this refers to the North Hertfordshire administrative area and not (as in the previous table) the North Hertfordshire School Place Planning Areas.

±please note: this refers to the Stevenage administrative area and not (as in the previous table) the Stevenage School Place Planning Areas.

±± please note: this refers to the North Hertfordshire and Stevenage administrative areas and not (as in the previous table) (all School Place Planning Areas for North Hertfordshire and Stevenage).

5. Summary and Conclusions

- 5.1 This report provides an independent review and assessment of the likely school pupil numbers residing in North Hertfordshire and Stevenage over the Plan period (2011-2031).
- 5.2 When undertaking high level school place planning related to new residential development, HCC determines child yield based on a ratio of 1 form entry (FE2) per 500 dwellings to be 97.5% confident of not under-estimating yield. We have considered the background and origin of the pupil yield relied upon by HCC and there are a number of concerns which are set out in more detail in this report (see paragraph 2.2 to 2.8).
- 5.3 In summary, HCCs objections rely on a statistically adjusted yield derived from a small number of developments across Hertfordshire based on a study that was originally undertaken for a different purpose. There is no apparent distinction made between primary and secondary school yields, despite a significant difference in the ranges between the two. Furthermore, the information on which this has been based is somewhat out of date.
- 5.4 In order to test this further, we have considered the potential growth in primary and secondary school pupils in North Hertfordshire and Stevenage over the plan period (2011-2031) using three alternative methodologies. The alternative methodologies are summarised below and the first two of these takes into account future housing trajectories:
- Regeneris' Housing Impact Model – a bespoke model which considers the type and mix of housing arising from the proposed development of new housing across the area in order to derive a child population.
 - Pupil yield calculators from elsewhere – we apply pupil yield ratios from neighbouring and similar authorities to the housing trajectories and compare the outputs with HCC's own pupil yield ratio.
 - Sub-National Population Projections (SNPP) 2014-based – we consider the population projections that underpin North Hertfordshire's Objectively Assessed Need (OAN) for housing and the maximum primary and secondary pupil population which arise from SNPP 2014.
- 5.5 The results using these methodologies are summarised in Table 5.1 below and the key points to note are as follows:

Primary school places

- When applying the HCC pupil yield ratio to both the North Hertfordshire and Stevenage housing trajectories, the outcome is significantly higher than when applying all other alternative pupil yields examined in this report.
- Overall, for North Herts and Stevenage¹³ collectively, alternative models used in this report point towards a requirement of between 3,622 and 7,403 primary school places (compared to a higher figure of 8,208 suggested when applying HCC's pupil yield ratio). An average of the alternative figures would suggest a requirement for 6,057 primary school places.

¹³ ie. School Place Planning Areas

- For North Hertfordshire (School Place Planning Area) alone, alternative models point towards a requirement of between 2,178 and 3,875 primary school places. All of these are significantly below the figure suggested when applying HCC's pupil yield ratio (4,498).
- For Stevenage (School Place Planning Area) alone alternative models point towards a requirement of between 1,444 and 3,870 primary school places. For Stevenage (School Place Planning Area), the figure based on HCC's pupil yield ratio (3,710) is towards the upper end of the range identified above.

Secondary school places

- As with primary school pupils, the application of HCC's pupil yield ratio for secondary school aged children derives a significantly higher outcome than the application of alternative pupil yield ratios used by other local authorities.
- Overall, for North Herts and Stevenage¹⁴ collectively, alternative models examined in this report point towards a requirement of between 2,436 and 4,958 secondary school places (compared to a figure of 5,863 forecast by HCC). An average of the alternative figures would suggest a requirement for 4,023 secondary school places.
- For North Hertfordshire (School Place Planning Area) alone, alternative models point towards a requirement of between 1,469 and 2,249 secondary school places. All of these are significantly below the figure suggested by HCC's pupil yield ratio (3,213).
- For Stevenage (School Place Planning Area) alone, alternative models point towards a requirement of between 967 and 2,709 secondary school places. For Stevenage (School Place Planning Area), the figure based on HCC's pupil yield ratio (2,650) is towards the upper end of the range identified above.

¹⁴ ie. School Place Planning Areas

Table 5.1 Comparison of pupil yields for North Hertfordshire and Stevenage based on different methodologies

| | Primary Schools | | | Secondary Schools | | |
|--------------------------------|-----------------|------------------------|---------------------|-------------------|------------------------|---------------------|
| | North Herts* | Stevenage [±] | Total ^{±±} | North Herts* | Stevenage [±] | Total ^{±±} |
| Regeneris Housing Impact Model | 2,324 | 2,498 | 4,822 | 1,560 | 1,661 | 3,221 |
| Bracknell Forest | 3,875 | 3,529 | 7,403 | 1,952 | 1,534 | 3,486 |
| Cambridgeshire County Council | 2,178 | 1,444 | 3,622 | 1,469 | 967 | 2,436 |
| Central Bedfordshire | 2,999 | 3,612 | 6,610 | 2,142 | 2,580 | 4,722 |
| Essex County Council | 2,827 | 2,893 | 5,720 | 1,884 | 1,929 | 3,813 |
| Hampshire County Council | 3,213 | 3,870 | 7,082 | 2,249 | 2,709 | 4,958 |
| Oxfordshire County Council | 2,677 | 3,225 | 5,902 | 2,142 | 2,580 | 4,722 |
| SNPP 2014** | 2,916 | 1,524 | 4,440 | 1,653 | 824 | 2,477 |
| Hertfordshire County Council | 4,498 | 3,710 | 8,208 | 3,213 | 2,650 | 5,863 |

* please note: this refers to the North Hertfordshire School Place Planning Areas and not the North Hertfordshire administrative area.

± please note: this refers to the Stevenage School Place Planning Areas and not the Stevenage administrative area.

±± please note: this refers to all School Place Planning Areas (ie. North Hertfordshire + Stevenage School Place Planning Areas).

**please note that pupil yield figures for North Hertfordshire and Stevenage based on the 2014-based Sub-National Population Projections are for administrative boundaries. This is because the 2014-based SNPP forecasts population change only at the Local Authority area.

Appendix A - Detailed Pupil Yield Tables

A.1 The following tables present a detailed breakdown of pupil yields for each school place planning area based on the North Hertfordshire and Stevenage housing trajectories for 2011 to 2031.

| | | 2011-16 | 2016-21 | 2021-26 | 2026-31 | Total |
|--------------------------------------|-----------|---------|---------|---------|---------|-------|
| Baldock | Primary | 106 | 259 | 628 | 635 | 1,628 |
| | Secondary | 76 | 185 | 448 | 454 | 1,163 |
| Harpenden | Primary | 3 | 39 | 7 | 0 | 49 |
| | Secondary | 2 | 28 | 5 | 0 | 35 |
| Hitchin | Primary | 66 | 378 | 477 | 101 | 1,022 |
| | Secondary | 47 | 270 | 341 | 72 | 730 |
| Letchworth | Primary | 58 | 267 | 251 | 316 | 891 |
| | Secondary | 41 | 190 | 179 | 226 | 636 |
| Royston | Primary | 48 | 268 | 260 | 162 | 737 |
| | Secondary | 34 | 191 | 186 | 116 | 527 |
| Welwyn Garden City | Primary | 11 | 51 | 43 | 65 | 170 |
| | Secondary | 8 | 36 | 31 | 46 | 122 |
| Stevenage* School Planning Areas | Primary | 372 | 1,106 | 1,359 | 873 | 3,710 |
| | Secondary | 266 | 790 | 971 | 624 | 2,650 |
| North Herts School Planning Areas | Primary | 292 | 1,262 | 1,665 | 1,278 | 4,498 |
| | Secondary | 209 | 901 | 1,189 | 913 | 3,213 |
| Total (All School Planning Areas) | Primary | 664 | 2,368 | 3,024 | 2,151 | 8,208 |
| | Secondary | 474 | 1,692 | 2,160 | 1,537 | 5,863 |

Source: Regeneris Consulting, 2017; Calculations based on method for calculating pupil yield based on ratios suggested by Hertfordshire County Council.

* Please note that pupil yields for developments in Stevenage town centre are based on the assumption that 850 dwellings would lead to 1 form entry (ie. 210 pupil places), instead of the standard assumption (ie. 500 dwellings = 1 form entry) used elsewhere.

Table A.2 Pupil yields based on method used by Bracknell Forest Council

| | | 2011-16 | 2016-21 | 2021-26 | 2026-31 | Total |
|--------------------------------------|-----------|---------|---------|---------|---------|-------|
| Baldock | Primary | 86 | 219 | 549 | 578 | 1,431 |
| | Secondary | 47 | 105 | 266 | 282 | 700 |
| Harpenden | Primary | 3 | 35 | 6 | 0 | 44 |
| | Secondary | 4 | 17 | 3 | 0 | 24 |
| Hitchin | Primary | 53 | 341 | 424 | 73 | 891 |
| | Secondary | 48 | 166 | 206 | 35 | 455 |
| Letchworth | Primary | 41 | 207 | 195 | 258 | 702 |
| | Secondary | 41 | 99 | 93 | 124 | 357 |
| Royston | Primary | 39 | 241 | 231 | 142 | 654 |
| | Secondary | 40 | 118 | 112 | 69 | 339 |
| Welwyn Garden City | Primary | 9 | 46 | 39 | 59 | 153 |
| | Secondary | 7 | 22 | 19 | 29 | 77 |
| Stevenage School Planning Areas | Primary | 414 | 963 | 1,290 | 861 | 3,529 |
| | Secondary | 210 | 399 | 553 | 371 | 1,534 |
| North Herts School Planning Areas | Primary | 232 | 1,089 | 1,444 | 1,110 | 3,875 |
| | Secondary | 186 | 528 | 699 | 540 | 1,952 |
| Total (All School Planning Areas) | Primary | 645 | 2,052 | 2,734 | 1,971 | 7,403 |
| | Secondary | 397 | 927 | 1,252 | 910 | 3,486 |

Source: Regeneris Consulting, 2017; Calculations based on method for calculating pupil yield based on dwelling size (ie. number of bedrooms) used by Bracknell Forest Council in *Planning Obligations, Supplementary Planning Document* from February 2015.

Table A.3 Pupil yields based on method used by Cambridgeshire County Council

| | | 2011-16 | 2016-21 | 2021-26 | 2026-31 | Total |
|--------------------------------------|-----------|---------|---------|---------|---------|-------|
| Baldock | Primary | 51 | 120 | 308 | 331 | 811 |
| | Secondary | 34 | 81 | 208 | 224 | 547 |
| Harpenden | Primary | 2 | 20 | 4 | 0 | 25 |
| | Secondary | 1 | 13 | 2 | 0 | 17 |
| Hitchin | Primary | 32 | 194 | 239 | 38 | 503 |
| | Secondary | 21 | 131 | 161 | 26 | 339 |
| Letchworth | Primary | 24 | 111 | 104 | 141 | 380 |
| | Secondary | 16 | 75 | 70 | 95 | 257 |
| Royston | Primary | 23 | 137 | 130 | 80 | 371 |
| | Secondary | 16 | 93 | 88 | 54 | 251 |
| Welwyn Garden City | Primary | 6 | 26 | 22 | 34 | 87 |
| | Secondary | 4 | 18 | 15 | 23 | 59 |
| Stevenage School Planning Areas | Primary | 170 | 368 | 540 | 367 | 1,444 |
| | Secondary | 113 | 246 | 362 | 246 | 967 |
| North Herts School Planning Areas | Primary | 138 | 609 | 807 | 624 | 2,178 |
| | Secondary | 91 | 411 | 545 | 422 | 1,469 |
| Total (All School Planning Areas) | Primary | 308 | 976 | 1,347 | 991 | 3,622 |
| | Secondary | 204 | 657 | 907 | 668 | 2,436 |

Source: Regeneris Consulting, 2017; Calculations based on method splitting pupil yield by house-type (ie. Market and/or Social) and number of bedrooms as used by Cambridgeshire County Council in the *Revision to child yield multipliers for new developments* note, issued in September 2015.

Please note: Market and social housing in North Hertfordshire and Stevenage are based on information available in their respective proposed local plan submissions.

Table A.4 Pupil yields based on method used by Central Bedfordshire District Council

| | | 2011-16 | 2016-21 | 2021-26 | 2026-31 | Total |
|--------------------------------------|-----------|---------|---------|---------|---------|-------|
| Baldock | Primary | 71 | 173 | 418 | 424 | 1,085 |
| | Secondary | 50 | 124 | 299 | 303 | 775 |
| Harpenden | Primary | 2 | 26 | 5 | 0 | 33 |
| | Secondary | 2 | 18 | 3 | 0 | 23 |
| Hitchin | Primary | 44 | 252 | 318 | 67 | 681 |
| | Secondary | 32 | 180 | 227 | 48 | 487 |
| Letchworth | Primary | 39 | 178 | 167 | 210 | 594 |
| | Secondary | 28 | 127 | 119 | 150 | 424 |
| Royston | Primary | 32 | 178 | 173 | 108 | 491 |
| | Secondary | 23 | 127 | 124 | 77 | 351 |
| Welwyn Garden City | Primary | 7 | 34 | 29 | 43 | 113 |
| | Secondary | 5 | 24 | 21 | 31 | 81 |
| Stevenage School Planning Areas | Primary | 421 | 1,036 | 1,304 | 851 | 3,612 |
| | Secondary | 301 | 740 | 931 | 608 | 2,580 |
| North Herts School Planning Areas | Primary | 195 | 841 | 1,110 | 852 | 2,999 |
| | Secondary | 139 | 601 | 793 | 609 | 2,142 |
| Total (All School Planning Areas) | Primary | 616 | 1,877 | 2,414 | 1,703 | 6,610 |
| | Secondary | 440 | 1,341 | 1,724 | 1,217 | 4,722 |

Source: Regeneris Consulting, 2017; Calculations based on method for calculating pupil yield used by Central Bedfordshire District Council in *The Planning Obligations Strategy, Consultation Draft* from July 2015.

Table A.5 Pupil yields based on method used by Essex County Council

| | | 2011-16 | 2016-21 | 2021-26 | 2026-31 | Total |
|--------------------------------------|-----------|---------|---------|---------|---------|-------|
| Baldock | Primary | 66 | 165 | 397 | 413 | 1,040 |
| | Secondary | 44 | 110 | 264 | 275 | 693 |
| Harpenden | Primary | 2 | 25 | 5 | 0 | 32 |
| | Secondary | 1 | 17 | 3 | 0 | 21 |
| Hitchin | Primary | 41 | 244 | 307 | 54 | 646 |
| | Secondary | 27 | 163 | 205 | 36 | 430 |
| Letchworth | Primary | 32 | 154 | 146 | 193 | 526 |
| | Secondary | 22 | 102 | 98 | 129 | 350 |
| Royston | Primary | 30 | 173 | 167 | 104 | 474 |
| | Secondary | 20 | 115 | 111 | 69 | 316 |
| Welwyn Garden City | Primary | 7 | 33 | 28 | 42 | 110 |
| | Secondary | 5 | 22 | 19 | 28 | 73 |
| Stevenage School Planning Areas | Primary | 352 | 804 | 1,045 | 692 | 2,893 |
| | Secondary | 235 | 536 | 696 | 462 | 1,929 |
| North Herts School Planning Areas | Primary | 177 | 794 | 1,049 | 806 | 2,827 |
| | Secondary | 118 | 529 | 700 | 537 | 1,884 |
| Total (All School Planning Areas) | Primary | 530 | 1,598 | 2,094 | 1,499 | 5,720 |
| | Secondary | 353 | 1,065 | 1,396 | 999 | 3,813 |

Source: Regeneris Consulting, 2017; Calculations based on method for calculating pupil yield used by Essex County Council in *The Essex County Council Developers' Guide to Infrastructure Contributions* from 2015 revision consultation draft.

Table A.6 Pupil yields based on method used by Hampshire County Council

| | | 2011-16 | 2016-21 | 2021-26 | 2026-31 | Total |
|--------------------------------------|-----------|---------|---------|---------|---------|-------|
| Baldock | Primary | 76 | 185 | 448 | 454 | 1,163 |
| | Secondary | 53 | 130 | 314 | 318 | 814 |
| Harpenden | Primary | 2 | 28 | 5 | 0 | 35 |
| | Secondary | 2 | 19 | 4 | 0 | 25 |
| Hitchin | Primary | 47 | 270 | 341 | 72 | 730 |
| | Secondary | 33 | 189 | 238 | 50 | 511 |
| Letchworth | Primary | 41 | 190 | 179 | 226 | 636 |
| | Secondary | 29 | 133 | 125 | 158 | 446 |
| Royston | Primary | 34 | 191 | 186 | 116 | 527 |
| | Secondary | 24 | 134 | 130 | 81 | 369 |
| Welwyn Garden City | Primary | 8 | 36 | 31 | 46 | 122 |
| | Secondary | 6 | 26 | 22 | 32 | 85 |
| Stevenage School Planning Areas | Primary | 451 | 1,110 | 1,397 | 912 | 3,870 |
| | Secondary | 316 | 777 | 978 | 638 | 2,709 |
| North Herts School Planning Areas | Primary | 209 | 901 | 1,189 | 913 | 3,213 |
| | Secondary | 146 | 631 | 833 | 639 | 2,249 |
| Total (All School Planning Areas) | Primary | 660 | 2,011 | 2,586 | 1,825 | 7,082 |
| | Secondary | 462 | 1,408 | 1,810 | 1,277 | 4,958 |

Source: Regeneris Consulting, 2017; Calculations based on method for calculating pupil yield used by Hampshire County Council in *Developers' Contributions towards Children's Services Facilities* from November 2016.

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Table A.7 Pupil yields based on method used by Oxfordshire County Council

| | | 2011-16 | 2016-21 | 2021-26 | 2026-31 | Total |
|-----------------------------------|-----------|---------|---------|---------|---------|-------|
| Baldock | Primary | 63 | 154 | 374 | 378 | 969 |
| | Secondary | 50 | 124 | 299 | 303 | 775 |
| Harpenden | Primary | 2 | 23 | 4 | 0 | 29 |
| | Secondary | 2 | 18 | 3 | 0 | 23 |
| Hitchin | Primary | 40 | 225 | 284 | 60 | 608 |
| | Secondary | 32 | 180 | 227 | 48 | 487 |
| Letchworth | Primary | 35 | 159 | 149 | 188 | 530 |
| | Secondary | 28 | 127 | 119 | 150 | 424 |
| Royston | Primary | 29 | 159 | 155 | 96 | 439 |
| | Secondary | 23 | 127 | 124 | 77 | 351 |
| Welwyn Garden City | Primary | 7 | 30 | 26 | 38 | 101 |
| | Secondary | 5 | 24 | 21 | 31 | 81 |
| Stevenage School Planning Areas | Primary | 376 | 925 | 1,164 | 760 | 3,225 |
| | Secondary | 301 | 740 | 931 | 608 | 2,580 |
| North Herts School Planning Areas | Primary | 174 | 751 | 991 | 761 | 2,677 |
| | Secondary | 139 | 601 | 793 | 609 | 2,142 |
| Total (All School Planning Areas) | Primary | 550 | 1,676 | 2,155 | 1,521 | 5,902 |
| | Secondary | 440 | 1,341 | 1,724 | 1,217 | 4,722 |

Source: Regeneris Consulting, 2017; Calculations based on method for calculating pupil yield used by Oxfordshire County Council in the *South Oxfordshire Submission Core Strategy Infrastructure Delivery Plan, Rest of the District* from March 2011.

Table A.8 Pupil yields based on 2014 Sub-National Population Projections

| | | 2011-16 | 2016-21 | 2021-26 | 2026-31 | Total |
|------------------------|-----------|---------|---------|---------|---------|-------|
| North Hertfordshire* | Primary | 1,549 | 606 | 416 | 345 | 2,916 |
| | Secondary | -211 | 1,060 | 572 | 232 | 1,653 |
| Stevenage [‡] | Primary | 1,020 | 225 | 159 | 121 | 1,524 |
| | Secondary | -330 | 775 | 301 | 78 | 824 |
| Total ^{±±} | Primary | 2,569 | 831 | 575 | 466 | 4,440 |
| | Secondary | -541 | 1,835 | 873 | 310 | 2,477 |

Source: Regeneris Consulting, 2017 based on 2014-based Sub-National Population Projections, 2016.

*please note: this refers to the North Hertfordshire administrative area and not (as in the previous table) the North Hertfordshire School Place Planning Areas.

‡please note: this refers to the Stevenage administrative area and not (as in the previous table) the Stevenage School Place Planning Areas.

±± please note: this refers to the North Hertfordshire and Stevenage administrative areas and not (as in the previous table (all School Place Planning Areas for North Hertfordshire and Stevenage)).



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Appendix 1h



NORTH HERTFORDSHIRE DISTRICT COUNCIL



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Jacqueline Nixon
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Our Ref: IF/lh
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Contact Officer: Ian Fullstone
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10th April 2017

Dear Jacqueline,

RE NHDC Local Plan and Duty to Co-operate

As per my previous email of 23 March 2017 and our meeting of 04 April 2017, I committed to providing a substantive response to the points raised in your letter of 22 March 2017.

In doing so I would emphasise that, in line with national policy, the District Council places great importance upon ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Although discussions at the Local Plan stage can often take place in the statistical or abstract sense, it is imperative to recognise that the building of new homes in North Hertfordshire will provide places to live for real families with real children. It is essential that we plan together to ensure that their future needs are appropriately addressed.

In light of this, as I reiterated when we met, the Council is committed to continued joint working and cooperation between us to further consider the issues.

Duty to Cooperate

Firstly, I would like to address some issues of broad principle.

NHDC does not accept the HCC position, as set out in your representations and repeated in your recent letter, that the District Council has failed to satisfy the legal Duty to Cooperate (the Duty) in the preparation of its new Local Plan.

Having reviewed the audit trail of correspondence and meetings between us, I consider that we can robustly demonstrate active and ongoing attempts to effectively cooperate with HCC to address education issues as the plan was developed.

Although these interactions have, as yet, been unable to bring us to a common position with regards education provision in the NHDC plan as a whole, I consider they demonstrate a continued willingness to engage on the part of both parties. It is important for us to recognise that a number of the requirements for education arising from future planned growth are supported (or not objected to) by HCC and in these areas we are on broadly common ground.

I would further note that the Duty does not impose a statutory requirement to agree.

Soundness of HCC evidence (1) – evidence base underpinning HCC requests

Your letter of 22 March identifies that NHDC disagree with HCC's method for calculating future education requirements. To be clear the Council's position is that it requires any method for calculating education requirements to be evidenced. As you will be aware, national planning policy requires Local Plans to be supported by robust and up-to-date evidence.

Previous material provided by HCC identifies that, when undertaking high level school place planning related to new residential development, HCC determines child yield based on a ratio of 1 form of entry (FE) per 500 dwellings. This is derived from a study encompassing 49 developments within Hertfordshire (3 within North Hertfordshire) undertaken in 2008. This identified an average of 23.2 primary children per 100 dwellings would arise. However, to minimise risk to HCC, a significant statistical adjustment to a rate of 42 children per 100 dwellings is preferred. I note that HCC's 'rebuttal' of NHDC's statement to the examination of Stevenage Borough Council's Local Plan dated 2 February 2017 concedes that "it can be argued that the new build study is becoming dated".

NHDC has advised HCC of its concerns over the relationship between the 1FE:500 homes approach, particularly in relation to the subnational population projections which we are required to use as the 'starting point' for the consideration of housing issues in our local plans and which suggest significantly lower numbers of additional children over the plan period. Although we accept that these projections may not end up marrying exactly to what happens in the future and have sought to make provision within the plan broadly in line with HCC's identified requirements (*expanded upon below*) - we remain concerned over the level of disconnect between these two approaches.

In this context, it is entirely reasonable for NHDC to have scrutinised the adequacy of evidence provided by HCC in coming to a view on the most appropriate way forward. NHDC has been consistent in identifying to HCC that requests for additional schools provision must be based upon adequate, up-to-date justification. This is of particular importance when considering a new school site for example within the green belt when exceptional circumstances have to be demonstrated, should such a scheme be placed in front of an Inspector and subject to objector scrutiny.

I acknowledge your letter of 6 April 2016 which stated HCC's intention to continue relying upon the 1FE : 500 dwellings ratio following a review of relevant data from the 2011 Census. However, no specific data or report accompanied this letter. When NHDC requested access to the information underpinning this conclusion, HCC advised that they did not envisage making any further information available.

As a result NHDC has commissioned its own work to review potential future yields arising from new development. We should shortly be in a position to share the findings of this work with you. When we met you identified that further comparative work has been undertaken by HCC with regard the 1:500 ratio with other Councils, this can hopefully also feed into this work.

Soundness of HCC evidence (2) – timing of future demand and phasing of additional provision

It is essential that robustly justified infrastructure provision is designed in from the outset rather than tagged on at a later date. However, the approach outlined above appears to assume that education provision in Local Plans should be based upon peak demand from all developments being realised simultaneously with those requirements then loaded on top of current demand.

In reality the development being planned for, both in NHDC and other surrounding districts within shared School Planning Areas, will come forward at different times. As you will be aware from current planning applications, some schemes are ready to come forward now. Other sites will be realised in the first five-years following adoption of plans while some are not anticipated to commence until the latter years of current plan periods.

Within this time, demand from more recently completed developments, such as at Great Ashby to the North of Stevenage, are likely to have peaked and begun their reversion back to longer-term averages. In combination, these factors will affect the overall levels of demand for education.

HCCs own work recognises this 'lag' between the implementation of development and the peak demand for schools places. This is especially the case for secondary school provision where peak demands may occur some 10-15 years after implementation.

In this context, some of the demand being identified from the current proposals is unlikely to be realised before the end of the current plan period in 2031. Once the above interrelationship between the different developments and demand from the existing housing stock are considered, the overall peak of future demand may be somewhat lower.

Scope of Local Plan examinations

Issues of soundness are, unlike the Duty, capable of remedy through the examination process. Should this Council resolve to submit its Local Plan for Examination on April 11, it is within the powers of any Inspector appointed to conduct the examination to propose Main Modifications to the plan. These would make matters upon which the plan would otherwise be unsound, sound.

In practical terms, and from recent experience, these powers are applied quite widely. Based upon your representations and subsequent correspondence, I consider that any changes to the NHDC plan which HCC may be minded to pursue fall within the scope of these powers.

Should NHDC and HCC agree to a joint position such as the provision of a new school site in advance of any hearing sessions, I do not consider this would need to result in the failure of the plan. Furthermore, an Inspector may consider that one or more proposed housing site(s) in the plan is/are undeliverable due to lack of education provision. In this event they could propose deletion of the allocation and its reversion to Green Belt. This could obviate any 'alternate use' position should HCC then be minded to pursue any such site for education use.

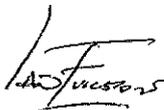
Development of the strategy set out in the plan

Notwithstanding our concerns over the issues of evidence and methodology set out above, NHDC has sought to include in its emerging plan a strategy for education which strives to meet the future demand identified by HCC in numerical terms whilst also addressing broader issues in relation to housing provision and the demonstration of exceptional circumstances. This is achieved through a range of policy requirements setting out actual or contingent requirements for new schools.

In particular relation to your concerns regarding provision in the Stevenage area, I would further identify that, in the longer-term, our plan 'safeguards' land to the west of the A1(M) at Stevenage for potential future development. Subject to a future review of the plan, this land could form part of the District's longer-term development strategy. Due to the size of this site, and in line with previous proposals, any future development would need to include a new secondary school. I anticipate that any such school would also accommodate demand from the land west of the A1(M) within Stevenage Borough's administrative area that forms part of their current plan. This scheme is currently included within HCCs forecasts of future demand. Meeting this need elsewhere would free up additional capacity in existing Stevenage schools to accommodate future growth.

In conclusion, the Council is committed to continue working with HCC in respect of education leading, I sincerely hope, to an agreed joint approach to meeting an evidenced need.

Yours sincerely,



Ian Fullstone
Head of Development and Building Control

Appendix 1-11

Draft Minutes

| | |
|--------------------------|--|
| Title of meeting: | NHDC & HCC Education Duty to Cooperate Meeting |
| Date: | Tuesday 4 April 2017 |
| Attendees: | <p>Hertfordshire County Council (HCC)</p> <ul style="list-style-type: none"> • Jacqueline Nixon (Head of Development Services – Property) • Andrea Gilmour (Principal Planning Officer, Development Services) <p>North Hertfordshire District Council (NHDC)</p> <ul style="list-style-type: none"> • Ian Fullstone (Head of Planning & Building Control) • Louise Symes (Strategic Planning & Projects Manager) |
| Venue: | NHDC Council Offices, Town Lodge, Letchworth Garden City |

| No. | Item |
|-----|---|
| 1.0 | <u>Purpose of Meeting:</u> |
| 1.1 | Meeting requested by HCC to discuss potential education sites north of Stevenage in relation to HCC objection to the North Hertfordshire Proposed Submission Local Plan. |
| 2.0 | <u>North Hertfordshire Local Plan Update</u> |
| 2.1 | <p>NHDC advised that:</p> <ul style="list-style-type: none"> • The reports for Full council had been prepared and the Plan would be going before Full Council on 11 April 2017 to approve the submission of the Plan to the Secretary of State (SoS) • Submission to the SoS would be before the end of May 2017 • They have written to PINS stating that a September/October 2017 Examination is preferred. |

| | |
|-----|--|
| 3.0 | <u>Education Matters</u> |
| 3.1 | HCC have submitted an objection to the NHDC Plan on duty to co-operate and soundness grounds in relation to education provision. HCC consider that the Plan does not make adequate deliverable provision, in particular for secondary education. |
| 3.2 | Officers from both organisations have corresponded and met on numerous occasions to discuss education matters over the past as part of the preparation of the NHDC Local Plan. These meetings have not always been conclusive in terms of agreed actions. NHDC has indicated a desire to work with HCC to resolve the issues raised in their representation. |
| 3.3 | HCC have since written to NHDC (letter Dated 22 March 2017) setting out their concerns regarding the process and progress of the NHDC Local Plan. In that letter HCC requested an officer meeting to discuss working together in identifying an alternative secondary school site to the north of Stevenage. |
| 3.4 | HCC tabled 2 possible alternative sites together with a high level report/transport assessment on the sites. HCC advised that they had been approached by the landowner for Site A and that the high level assessment undertaken by their consultants suggested that this site would be the more favourable site to pursue. |
| 3.5 | NHDC advised that Site A had been submitted as a separate representation to the Local Plan Proposed Submission draft for a possible secondary school alongside some aspirational housing to the north of the site, and at this stage would be a matter for the Inspector to consider. |
| 3.6 | HCC advised that a transport assessment had been undertaken for the site and this would be shared with NHDC once completed. |
| 3.7 | NHDC advised that the independent study they had commissioned to be undertaken by Regeneris to objectively review the HCC approach in deriving pupil yields was near |

| | |
|------|---|
| | completion and this would be shared with HCC. |
| 3.8 | HCC advised that they were also looking at neighbouring authorities in terms of pupil yields and this work would be shared as would the strategic approach to education for North of Hertfordshire |
| 3.9 | The option of possibly including Site A in the Local Plan was discussed. NHDC advised that in order to include the site as part of the Local Plan, this would need to be justified with a robust evidence base, in order to demonstrate exceptional circumstances for rolling back the Green Belt. Such work would need to be undertaken before the Council would consider suggesting this to the Inspector as a main modification to the Local Plan. The Council would not support delaying the plan to undertake this work ahead of submission as it is strongly of the view that this is a soundness issue that may be resolved by working together leading up to the examination. |
| 3.10 | The option of HCC having the powers to submit their own planning application was also discussed, HCC advised that this would require significant extra work being undertaken to demonstrate very special circumstances. |
| 3.11 | NHDC advised that in working together with HCC in pursuing a possible secondary school site north of Stevenage such justification would require: <ul style="list-style-type: none"> • Understanding HCC's Strategic Approach for the Stevenage School Planning Area (SSPA) • Demonstrating the need for the site in terms of pupil numbers and trigger points/forecasting future demand during the plan period in terms of delivering the site by 2020 (as alluded to by HCC at the meeting) • A <u>full</u> site assessment in terms of detailed planning matters |
| 4.0 | <u>Agreed Actions:</u> |
| 4.1 | That NHDC would formally respond to HCC letter of 22 March following this meeting |

| | |
|-----|---|
| 4.2 | That HCC would set out their strategic approach for education provision in the SSPA |
| 4.3 | NHDC will share the Regeneris Report with HCC, and HCC would meet with the consultants and NHDC to discuss their findings in order to demonstrate a need and timing for the additional site |
| 4.4 | Both authorities would work together in undertaking full site assessment for a possible site to the north of Stevenage. |

Appendix 1i



**Resources
Property**



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Contact: Jacqueline Nixon
My ref:North Herts Local Plan
Your ref:
Date 22nd March 2017

Dear Ian,

Local Plan and Duty to Co-operate

Following the recent discussions between officers (and Members) of both North Hertfordshire District Council, (NHDC) and Hertfordshire County Council (HCC) I am writing to you with regard to the process and progress of the North Hertfordshire District Council Local Plan.

You are of course aware HCC has objected to the draft local plan on Duty to Co-operate and soundness grounds. Please note HCC's objection on Duty to Co-operate (DtC) grounds was not made lightly. HCCs had identified a suitable secondary school site to the north of Stevenage, but NHDC allocated this for residential development in the draft Regulation 19 local plan. The DtC objection is made on the premise that this is both a strategic matter as well as a cross boundary one since a school would serve pupils in East Hertfordshire District Council, Stevenage Borough Council and North Hertfordshire District Council.

In addition HCC has objected to the draft local plan on soundness grounds as a result of inadequately providing for education infrastructure. NHDC disagree with HCCs methodology for calculation of pupil yield which has an impact on the amount of infrastructure to be provided and has appointed an external consultant to review the HCC approach.

As a result of the NHDC decision not to allocate the identified school site HCC has undertaken significant additional urgent work and has commissioned consultants to search for an alternative school site as well as liaise with landowners. This work is due



to reach conclusion in the next few weeks, but it is not known at this stage whether an alternative site will emerge. The allocation of the suitable site to residential use and the perceived lack of an alternative site clearly places the provision of a new secondary school at risk.

NHDC have recently indicated a desire to work with HCC requesting that HCC confirms in writing that co-operation is ongoing on the issues above in order that the DtC matter can be mitigated. HCC considers that in order to agree this NHDC will need to work with HCC to identify an alternative school site and would allocate this in the local plan ahead of submission stage. There needs to be formal recognition of this approach, initially by exchange of letters leading towards a Statement of Common Ground (SoCG) to be completed (by the 11th April Committee).

The above scenario would seem to offer a solution if an alternative site is identified, agreed and allocated. In that event, further discussions between our authorities should be planned now for consideration of the external consultant's report on the calculation of pupil yield. However, in the event that identification of a suitable site or agreement to allocate one does not happen for any reason, it is not clear what the next steps might be, since the current situation, ie non provision of a secondary school site to the north of Stevenage, would not change.

-To assist you in taking each of these matters forwards it is proposed that an officer meeting is held within the next week to confirm our joint understanding of the above and to agree a schedule of actions and further meetings to deal with each of the issues identified,. This meeting will confirm our joint understanding and agreement to each of the actions proposed in this letter and to agree a schedule of dates by which they will be complete. Your agreement of the above should be received within one week.

I look forward to your response.

Yours sincerely,

A handwritten signature in cursive script that reads "J Nixon".

Jacqueline Nixon
Head of Development Services
Property

Appendix 1I

**HERTFORDSHIRE COUNTY COUNCIL
PROPERTY (DEVELOPMENT SERVICES)**

NORTH HERTS DISTRICT COUNCIL

**REPRESENTATIONS ON REGULATION 19 PROPOSED
SUBMISSION LOCAL PLAN CONSULTATION DOCUMENT ON
BEHALF OF HCC SERVICES**

NOVEMBER 2016

1.0 INTRODUCTION

- 1.1 The following representations are made on behalf of Hertfordshire County Council Property (Development Services) in relation to the North Herts Council Regulation 19 Local Plan Consultation Document. They represent the interests of various departments within Hertfordshire County Council (HCC), including Children's Services; Health and Community Services (HCS); Waste Management; Libraries; Community Protection; and the Gypsy and Travellers section.
- 1.2 The approach adopted to the representations follows the format of the consultation document itself. It should be noted that comments are only made on those policies that are considered to have an impact upon the provision of the County Council's services.
- 1.3 The representations in relation to education, together with information relating to school place planning, are contained in **Appendix A**.
- 1.4 Separate representations have been submitted by HCC as landowner.

SECTION ONE – INTRODUCTION AND CONTEXT

2.0 A Picture of North Hertfordshire

- 2.1 HCC Property (Development Services) has no comments to make on this chapter.

SECTION TWO - SPATIAL STRATEGY AND STRATEGIC SITES

3.0 Spatial Strategy and Spatial Vision

- 3.1 HCC Property (Development Services) has no comments to make on this chapter.

4.0 Strategic Policies Sustainable Development

- 4.1 Policy SP1 refers to sustainable development in North Hertfordshire. Part c of policy SP1 states that the District Council will:
'grant planning permission for proposals that, individually or cumulatively:
 - iii provide the necessary infrastructure required to support an increasing population.*
- 4.2 HCC consider that the District Council has failed to include sufficient school places to meet the needs arising from the increasing population that will arise from the housing development included in the emerging local plan.
- 4.3 This failure results in the plan not being positively prepared. The plan is required to be based on a strategy that meets infrastructure

requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so.

4.4 HCC consider that NHDC has not met the requirements of the existing and new population in the following strategic locations:

- SP14: Site BA1 – North of Baldock
- SP15: Site LG1 – North of Letchworth Garden City
- SP16: Site NS1 - North of Stevenage
- SP18: Site GA2 – Land off Mendip Way, Great Ashby
- SP19: Sites EL1, EL2 and EL3 – East of Luton

4.5 Detailed objections are provided in the responses to the strategic policies from 4.25 below.

4.6 The plan is therefore not effective because it is not deliverable without this infrastructure. In addition, it has failed to provide effective joint working on cross boundary strategic priorities.

Countryside and Green Belt

4.7 Policy SP5: part c refers to development proposals in the Green Belt only being permitted where they would not result in inappropriate development. Many of the schools in North Herts, particularly secondary schools are located within the Green Belt. Indeed in Letchworth both secondary schools have Green Belt locations.

4.8 As a consequence of the housing proposed in the local plan it will be necessary for many schools to be expanded, including some located in the Green Belt. The County Council as education authority would not wish this policy to restrict the expansion of this key infrastructure which would be required to meet the needs of the development proposed within the local plan.

Infrastructure

4.9 Policy SP7 refers to infrastructure requirements.

4.10 HCC is a provider of infrastructure within the District including education, early year's provision, Youth Connexions, libraries, health and community services, community protection and waste disposal.

4.11 Specific needs within settlements are given in the relevant response in Section 4. However, more general District wide information is given below.

Education

4.12 As detailed in **Appendix A**, HCC is the local education authority whose responsibilities include the planning and commissioning of school places in its local authority area.

Children's Centres

- 4.13 Children's Centres are provided by HCC Children's Services. These are often, but not exclusively, provided on school sites. The information contained in **Appendix B** details the current position and the requirements arising from the proposed housing development for the provision of Early Years facilities in the District.

Youth Connexions

- 4.14 The HCC Youth Connexions team offer young people youth work, information, advice, guidance, outdoor education and work related learning. Details of their service are provided in **Appendix C**.

Library Services

- 4.15 There are currently five libraries located in the District located in Baldock, Hitchin, Knebworth, Letchworth Garden City and Royston. Information regarding the requirements of each of these to meet the needs from the additional housing to be provided in these settlements is given in Section 4.

Health and Community Services

- 4.16 Details of the requirements of health and community services are provided in response to the relevant housing policies in Section 3 and in **Appendix D**.

Community Protection

- 4.17 Hertfordshire Fire and Rescue Service do not believe that there is a need for additional fire facilities in the District to support the proposed new housing development. However, the Service would continue to recommend the provision of sprinkler systems in all buildings and new developments to form part of an integrated safety provision.

Waste Disposal

- 4.18 HCC as the Waste Disposal Authority (WDA) requires strategically located facilities for the management of Local Authority Collected Waste (LACW) to ensure the effective management of waste arising in the District.

Design

- 4.19 Part b of Policy SP9 is requiring master plans for significant is noted. As referred to throughout these representations master planning of significant developments is essential to ensure that infrastructure requirements are met.

Healthy Communities

- 4.20 Part e of Policy SP10: Healthy Communities states that NHDC will:

Work with Hertfordshire County Council and education providers to ensure the planning system contributes to the provision of sufficient school places and facilitates the provision of new or expanded schools in appropriate and accessible locations.

- 4.21 HCC are the education authority and as such are the commissioner of school places. More information on the role of the County Council in education provision is provided in **Appendix A**.
- 4.22 As will be discussed later in these representations it is considered that NHDC have not worked with HCC in the preparation of the Local Plan to ensure that sufficient school places are available. As such the County Council consider the plan to be unsound as it is not based upon a strategy that seeks to meet infrastructure requirements.
- 4.23 Paragraph 4.125 refers to 'lower' schools. In Hertfordshire schools providing places for children from Reception to Year 4 are called 'first' schools.

Natural and Historic Environment

- 4.24 Policy SP12 seeks to protect the green infrastructure network. In some instances it may be necessary for green infrastructure located in close proximity to a primary school to be used as a detached playing field to support the provision of additional school places to support the proposals within the local plan. In these cases HCC would seek to work with the District Council to ensure that the use of green infrastructure, which would continue to be protected, could assist in the provision of school places.

Strategic Housing Sites

- 4.25 As stated in 4.1 above HCC considers that on all of the strategic sites the District Council has failed to meet the infrastructure requirements that will arise from those developments. As a consequence the County Council do not consider the plan to be sound as it has not been positively prepared. The detailed representations in relation to each of these sites are given below..

Policy SP14: Site BA1 – North of Baldock

- 4.26 It is noted that Policy SP14 requires a site masterplan to be prepared which is welcomed.
- 4.27 However, Part h of SP14 refers to up to 6FE of additional primary-age and secondary-age education provision being provided on site BA1.
- 4.28 3600 homes are proposed in total in Baldock, including site BA1, which equates to a demand for 7.2FE of school places.
- 4.29 In considering the total scale of development proposed in Baldock the education infrastructure requirement should therefore include:
- A pattern of new primary school sites to accommodate up to 8FE of primary provision, suitably located within the development to serve the new communities north and south of the railway.
 - A secondary school site of up to 8FE in size to the north of the railway, which could include all through education provision.

4.30 The exact configuration of the above education infrastructure is still to be finalised and will need to be included in the masterplan. Some expansion of Knights Templar School is possible and could be considered in this exercise.

4.31 HCC consider that the District Council has failed to include sufficient secondary school provision in Baldock to meet the needs arising from the increasing population from the housing development included in the emerging local plan. It is therefore considered to be unsound.

Policy SP15: Site LG1 – North of Letchworth Garden City

4.32 The inclusion of a site masterplan in Policy SP15: Site LG1 is welcomed. However, part a (iii) of policy SP15 refers to an appropriate education solution with a presumption in favour of onsite provision of a new primary school.

4.33 The proposed 900 units at SP15 will result in a 1.8FE demand for school places. A new 2FE primary school is therefore required within the site to meet that demand.

4.34 The failure to provide a new school would result in insufficient primary school places being available in this part of Letchworth Garden City. HCC consider that without a primary school in this location the local plan is unsound as it has not been positively prepared to meet infrastructure requirements.

Policy SP16: Site NS1 North of Stevenage

4.35 Site NS1 North of Stevenage should be delivered jointly through a master plan to be prepared with Stevenage Borough Council, which controls the adjoining land to the south.

4.36 There is a requirement at Part b of policy SP16 that site NS1 achieves the following:

‘integration with adjoining development in Stevenage Borough including site-wide solutions of access, education, retail and other necessary social infrastructure’.

4.37 The provision of 900 dwellings in NS1 will result in a demand for 1.8FE school places. On this basis HCC would seek a 2FE primary school within the NHDC land to the north of Stevenage, with any adjacent development within Stevenage Borough having its own primary provision.

4.38 Indeed, the area of this site located within Stevenage Borough is allocated for 800 units and includes a primary school. This is to be a 1FE school located on a 2FE site.

4.39 The failure to provide a new school would result in insufficient primary school places being available to the North of Stevenage. HCC

consider that without a primary school at NS1 the local plan is unsound as it has not been positively prepared to meet infrastructure requirements.

Policy SP17: Site HT1 – Highover Farm, Hitchin

- 4.40 Policy SP17: Site HT1 part a, requires a site masterplan to be prepared which is welcomed.
- 4.41 New on site provision of a primary school is included in the policy for the proposed 700 homes, although the size is not specified. This development would result in a requirement for 1.4FE of school places. Paragraph 4.205 refers to the size of the school to be provided being determined by the expansion potential of Highover JMI. This school has already been expanded and has no expansion capacity. In addition, there is limited capacity in the existing primary schools across the town for expansion.
- 4.42 The total number of dwellings proposed for Hitchin, including HT1 is 1009 resulting in a demand for 2FE of school places in the town.
- 4.43 To meet the infrastructure needs arising from all of the proposed housing development in Hitchin, the new school at HT1 would therefore need to be 2FE in size.

Policy SP18: Site GA2 – Land off Mendip Way, Great Ashby

- 4.44 Details regarding the HCC services requirements for Policy SP18 Site GA2 are contained in the response to Section Four.
- 4.45 Policy SP18 allocates site GA2 for 600 homes. Part c of Policy SP18 requires:
- up to four hectares of land for education purposes subject to up-to-date assessments of need including, at minimum, 2FE of primary-age provision.*
- 4.46 Stevenage Borough Council is also proposing housing within their boundary to the north of the settlement. There is a need to plan holistically for the cumulative impact from proposed developments in this area.
- 4.47 In April 2010 planning permission was granted on the north western area of GA2 for a secondary school. This permission had now lapsed.
- 4.48 HCC have consistently requested that, given the combined level of development proposed at North and North-East Stevenage, it would be prudent to plan for future secondary school needs in this area.
- 4.49 This has included advising NHDC of this requirement in the responses to the various housing scenarios that the District Council has tested

since 2010 when preparing the Regulation 18 and 19 Local Plans. This information can be made available on request.

- 4.50 Indeed HCC have previously made representations requesting that the area of site GA2 previously granted permission for a secondary school be allocated for this purpose. This included requesting that an education zone for 2FE primary school and 6FE+ secondary school be held in reserve pending the future demand for school places in the HCC representations to the Regulation 18 Local Plan Preferred Options in February 2015. These representations are contained in **Appendix E**.
- 4.51 In January 2016 HCC undertook a Transport Assessment (TA) of site GA2 to determine whether the local highway network could support an 8FE secondary school, with either a 1FE or 2FE primary school, and a quantity of housing on the remaining land. This work was undertaken to inform the representations to be made to the North Herts Local Plan Regulation 19 consultation.
- 4.52 The TA, included at **Appendix F**, concluded that within the context of this part of northeast Stevenage, the scale of the proposed development, the traffic generation and resulting impact would be considerable. It identified that there is only one apparent and currently available point of access and that the overall limited capacity of the existing road network (except for Martins Way) would undoubtedly be placed under considerable strain if it was expected to serve a development of this size.
- 4.53 In March 2016, to inform the County Council's strategy for secondary school places in Stevenage and North Herts, HCC employed town planning consultants Vincent and Goring (V&G) to search for, and evaluate, potential new school sites.
- 4.54 V&G have experience of undertaking secondary school searches for HCC across the County, including in South West Hertfordshire. The work undertaken (and therefore by implication, the methodology employed) for the site search was accepted by the Inspector at the Three Rivers Site Allocations DPD Examination in Public where HCC achieved two allocations for new secondary schools.
- 4.55 The search identified site allocation GA2 as the most suitable location for a new secondary school. This report is included at **Appendix G**.
- 4.56 However, as the majority of this site has now been allocated for housing, it is no longer affordable or deliverable for education.
- 4.57 NHDC officers were made aware that this work had been commissioned. Indeed, they were invited to and attended the presentation of findings in July 2016 where HCC officers highlighted

that if no secondary school site was identified at Great Ashby then the County Council would have no option but to object to the local plan.

- 4.58 As detailed in the correspondence included at **Appendix H**, HCC sought to engage with NHDC officers to discuss this matter, but they have consistently refused to meet. Instead NHDC requested that the agent acting for the landowner of site GA2 should meet HCC.
- 4.59 That meeting took place in September 2016. The purpose of the meeting was to determine whether the landowner would consider the use of land outside of the site allocation for playing fields and possibly additional built development to support a secondary school.
- 4.60 At that meeting the agent and landowner confirmed that they have also undertaken a TA which also demonstrates that the local highway network would not support the quantum of development proposed at GA2 and a secondary school.
- 4.61 Following that meeting the site to the East of Stevenage, within East Herts, which ranked second in the search, was reconsidered. It was again discounted as it is not in the correct location, given existing highway arrangements, to meet the need arising from the new development in the North and North-East of Stevenage, as detailed in the education strategy contained in the site search.
- 4.62 In October 2016 HCC instructed V&G to extend the search further into the green belt beyond the area already considered to identify a secondary school site. This work is currently underway.
- 4.63 In addition, HCC consultants are currently preparing TAs for all of the Stevenage secondary schools and the site for another new school proposed at Barnwell East (to be clear, a school to be rebuilt within the urban area). This is both to confirm the expansion potential of each of the existing schools, and to test the assumption that any new secondary school at Barnwell East might be enhanced beyond 5FE, the capacity of the school previously occupying the site. This work is due to be concluded in December 2016.
- 4.64 The failure of NHDC to identify a site for a new secondary school also impacts upon both the Stevenage Local Plan and the East Herts District Plan.
- 4.65 The representations submitted by HCC to the Stevenage Local Plan in February 2016 require the identification of a new 8FE secondary school site on the edge of Stevenage, within North Herts District, to meet the needs of both Stevenage Borough Council (SBC) and NHDC.
- 4.66 Since the publication of the Stevenage Local Plan, East Herts District Council has allocated a site to the East of Stevenage (Policy EOS1) in its Regulation 19 District Plan, currently out to consultation until 15

December 2016. This includes provision for 600 units, which is estimated to yield over 1FE of need for secondary school places. The site is on the edge of Stevenage, and therefore children from this development would look to the secondary schools in the town for a school place. Consequently this development contributes to the cumulative demand for school places in Stevenage.

- 4.67 In conclusion, HCC as the local authority for education objects to policy SP18 (site GA2) as it is not considered to be sound.
- 4.68 The allocation in the policy of four hectares of land for education is insufficient to serve the need in the area. A 2FE primary school alone would require a minimum site size of 2 hectares.
- 4.69 This policy has not been positively prepared as it is not based on a strategy which seeks to meet infrastructure requirements, including unmet need from the neighbouring authority of Stevenage Borough.
- 4.70 The plan is not effective as sufficient secondary school places cannot be delivered over its period. It is therefore not based on effective joint working on the cross boundary strategic priority of providing adequate infrastructure, through the provision of sufficient secondary school places.
- 4.71 As NHDC has failed to cooperate with HCC in the provision of adequate secondary school places to the North and North East of Stevenage this impacts directly on the Stevenage Local Plan and indirectly on the East Herts Local Plan.
- 4.72 The local planning authority needs to work with HCC as education authority to identify and allocate an alternative site for a secondary school to serve this locality.

Policy SP19: Sites EL1, EL2 and EL3 – East of Luton

- 4.73 Details regarding the HCC services requirements for Policy SP19: Sites EL1, EL2 and EL3 are contained in the response to Section Four.
- 4.74 Part e of policy refers to up to 4FE of primary and secondary education provision to be provided on the site.
- 4.75 These sites are allocated for 2,100 homes which would result in a demand for 4.2FE of demand for school places.
- 4.76 At least 4FE of primary school provision is therefore required within these sites to meet that demand. Ideally this provision should be in the form of 2 x 2FE sites. The failure to provide new schools would result in insufficient primary school places being available to serve these developments. HCC consider that without sufficient primary school places in this location the local plan is unsound as it has not been positively prepared to meet infrastructure requirements.

- 4.77 In addition 4.2FE of secondary school places are required to serve these developments.
- 4.78 The nearest Hertfordshire secondary schools to sites EL1, EL2 and EL3 are in Hitchin, approximately six miles from the proposed developments. The sites fall mainly within the Hitchin priority area for admissions purposes. The secondary schools in Hitchin are all full at year of admission and current forecasts indicate a need for additional places to meet rising demand from the existing community. Proposals have therefore been brought forward to increase the number of Year 7 places available at Hitchin Boys' School and Hitchin Girls School by 1.5FE each, thereby providing an additional 3FE of permanent capacity across the town from 2018.
- 4.79 There are closer secondary schools to sites EL1, EL2 and EL3 within Luton. However, Luton Borough Council is also experiencing increased demand for secondary provision across their area and there is no existing surplus capacity available in Luton schools to accommodate the yield from this development.
- 4.80 In light of this, the County Council supports Policy SP19a which requires a master plan to be prepared. This should result in a sustainable development being brought forward that is capable of delivering new primary and secondary schooling for those new local communities.
- 4.81 The new secondary school could be sized to accommodate Hertfordshire pupils, for whom it would be their nearest school, thereby reducing pressure in Hitchin. This would need to be a minimum of 6FE.
- 4.82 As outlined above, there is no available capacity in the closest Hertfordshire secondary schools in Hitchin which are currently full and already implementing expansion proposals to meet local need. Discussions with Luton Borough Council confirm that it has no existing secondary capacity to meet the needs from the yield arising from any new housing proposed at East of Luton.
- 4.83 Therefore a new school site is required to meet the need from this proposed development.
- 4.84 It is requested that, in line with part a of policy SP19, the area as a whole is master planned, as the appropriate delivery of sufficient secondary capacity for the development as a whole is problematic if the individual sites are managed in isolation. The provision of an all-through school within the development could be considered as a way of managing the primary and secondary yield arising from this new housing.

- 4.85 In light of the demand arising from Hitchin, the County Council would seek a larger secondary school (of at least 6FE) to meet the needs both arising from the new development as well as the needs of surrounding Hitchin villages for which this new secondary school would become their closest Hertfordshire school. There may be an opportunity to expand this school further should Luton Borough Council wish to address some of its secondary demand issues through the provision of additional capacity at East of Luton.
- 4.86 If the new secondary school East of Luton only has 4FE of capacity, HCC may need to object to the level of new housing across the Hitchin area on the basis of insufficient secondary capacity to meet the entire anticipated yield.

SECTION THREE – DEVELOPMENT MANAGEMENT POLICIES

5.0 Economy and Town Centres

5.1 HCC Property (Development Services) has no comments to make on this chapter.

6.0 Countryside and Green Belt

6.1 The comments made in relation to policy SP5 at 4.7 above are relevant to this chapter.

7.0 Transport

7.1 HCC Property (Development Services) has no comments to make on this chapter.

8.0 Housing Strategy

8.1 Part b of policy HS1 refers to planning permission for residential development and associated infrastructure being granted for the local housing allocations where

‘...Proposals successfully address site specific considerations’

8.2 Policy HS1 assumes that the appropriate site specific considerations are included within the local plan with regard to infrastructure. As highlighted at 4.4 above this plan fails to address site specific considerations particularly at a number of strategic sites where insufficient school places would be available to serve both the proposed new housing and the existing population.

8.3 Policies HS4 and HS5 are supported by HCS. Further information regarding their requirements are contained in **Appendix D**.

8.4 The allocation of seven permanent Gypsy and Traveller pitches in policy HS7 is welcomed.

9.0 Design

9.1 HCC Property (Development Services) has no comments to make on this chapter.

10.0 Healthy Communities

10.1 HCC Property (Development Services) has no comments to make on this chapter.

11.0 Natural Environment

11.1 HCC Property (Development Services) has no comments to make on this chapter.

12.0 Historic Environment

12.1 HCC Property (Development Services) has no comments to make on this chapter.

SECTION FOUR – COMMUNITIES

13.0 Communities

13.1 Information regarding the service requirements as a consequence of the proposed development within each of the settlements identified in North Hertfordshire is set out below.

Ashwell

13.2 There is a 1FE primary school located in Ashwell. Funding will be sought to ensure the local education infrastructure can accommodate the additional demand arising from the 33 dwellings proposed in Site AS1.

Baldock

13.3 Detailed representations regarding site BA1 are contained in section 4.

13.4 With regard to Youth Connexions requirements, currently HCC has no venue to deliver youth work in Baldock and would like to access a rentable venue for the delivery of good quality youth work.

13.5 Baldock has a small community library which is considered to be fit for purpose. Additional stock, shelving and IT would be required to support the proposed population increase. Policy BA10 relates to the employment allocation at Royston Road. The policy does not specify the types of employment uses envisaged for this site.

13.6 HCC is aware that the District Council are looking to locate their depot within BA10. In line with the National Planning Policy for Waste 2014 the WDA believes opportunities for co-locating a HWRC and the District Council Depot, which could deliver better value for money and result in operational efficiencies, should be considered as part of the Baldock Master Planning process.

13.7 A large HWRC site within BA10 would improve the efficiency of the HWRC service as increased space would enable a greater throughput of vehicles; reduce the impact of vehicles queuing on the local road network; and allow a greater number of materials to be segregated for treatment instead of disposal. In addition, the WDA require a waste transfer station to be located in the northern part of the County. Following site searches carried out in 2015 site BA10 was identified as a potential location for such a facility.

13.8 HCC consider that the HWRC, NHDC depot and the northern transfer station should all be located on BA10. These uses will be included within the masterplan currently being prepared. The wording of policy BA10 should be amended to reflect these proposed uses.

Barkway

13.9 A total of 173 dwellings are proposed for Barkway, providing a pupil yield of 0.35FE. The existing school site is constrained and considered

difficult to expand. HCC therefore support the retention of the existing reserve school site allocation in the emerging Local Plan.

Barley

13.10 HCC Property (Development Services) has no comments to make.

Bygrave

13.11 HCC Property (Development Services) has no comments to make. Comments relating to the land to the North of Baldock within Bygrave parish are provided in 13.3 above.

Caldecote

13.12 HCC Property (Development Services) has no comments to make.

Clothall

13.13 HCC Property (Development Services) has no comments to make. Comments relating to sites within Clothall parish allocated for housing in Baldock are provided in 13.3 above.

Cockernhoe and East of Luton

13.14 The existing Cockernhoe Endowed Primary School should be considered in the pattern of primary school provision in the East of Luton development.

13.15 With regard to Youth Connexions, the nearest provision of youth facilities is at Bancroft in Hitchin.

Codicote

13.16 The proposals for 315 dwellings will result in a demand for 0.6FE of school places in the village.

13.17 The existing 1FE Codicote school site is constrained and current forecasts indicate a shortage of places from the existing community without any additional housing development. Expansion of the existing primary school is therefore required.

13.18 The inclusion of land within site CD5 Land South of Heath Lane is supported and welcomed. This additional land will provide the school with a detached playing field enabling the school to expand on its current site. The provision of a drop off/pick up area within, or adjacent to, the additional land would also alleviate the existing highways issues at the school.

13.19 However, in order to generate sufficient pupil yield and S106 funding to make the expansion of the school by 1FE viable the four development sites need to come forward within the same time period otherwise there will be insufficient school places for children moving into the new developments.

Graveley and North of Stevenage

- 13.20 Representations regarding site NS1 are contained in section 4 above.
- 13.21 Site GR1 is located within the village of Graveley. It is anticipated that the pupil yield from the proposed eight dwellings could be accommodated within the existing primary school.

Great Ashby and North East of Stevenage

- 13.22 Two sites are proposed for housing in Great Ashby and North East of Stevenage. Site GA1 has already come forward as a planning application and contributions have been sought from this development towards the expansion of The Leys Primary School as this is the closest existing primary school to the development with expansion potential. However, even with this development coming forward in advance, HCC would still seek a new 2FE primary school site as a result of the remaining housing sites and other sites coming forward in the northern Stevenage area.
- 13.23 With regard to secondary school places, contributions have been sought towards the expansion of Barclay School in Stevenage. However, it should be noted that if this planning application were to come forward now, as there are insufficient secondary places to serve this area for the long term and, with no identified solution to meet the identified need for the future, it is likely that HCC would be objecting to the proposal.

Hexton

- 13.24 HCC Property (Development Services) has no comments to make.

Hinxworth

- 13.25 HCC Property (Development Services) has no comments to make.

Hitchin

- 13.26 Bearton Green is a reserve school site in the adopted Local Plan. Since September 2016 Bearton Green has been used as a detached playing field by William Ransom Primary which is being permanently expanded to 2FE. It would therefore be appropriate for the reserve site allocation to be carried forward into the emerging Local Plan as it would provide flexibility in that if needed, the land could be used to facilitate expansion of other existing schools by providing additional detached playing fields.
- 13.27 There are current proposals to expand both Hitchin Boys and Hitchin Girls Schools, which leaves some limited remaining expansion capacity. This is assisted by the removal of The Priory School from the Green Belt.
- 13.28 Additional secondary school capacity to the East of Luton to accommodate the demand from families living in the villages who would traditionally look to Hitchin is supported.

- 13.29 It is worth noting that the development at Highover Farm is closer to Letchworth Garden City for secondary provision. Pupil yield from this development may look to Letchworth Garden City rather than Hitchin for secondary education.
- 13.30 Paragraph 13.132 identifies the Churchgate Centre and surrounding area as a location for mixed use redevelopment. This could potentially include some residential development. As the numbers are not known an assessment cannot be made of the impact upon the demand for school places.
- 13.31 Hitchin library is due to be refurbished in 2016/17. It is anticipated that additional stock shelving and IT would be required as a result of the proposed increase in population.

Holwell

- 13.32 HCC Property (Development Services) has no comments to make.

Ickleford

- 13.33 The proposed 199 homes would generate a requirement for 0.4FE of school places. Ickleford primary school is a 1FE school on a confined site.
- 13.34 A site for a new 2FE primary school would be required within site IC3 which would include the relocation of the existing school. However, an additional 0.4FE of demand may not be sufficient to support the relocation of the school. HCC preference is for 2FE primary schools as discussed in **Appendix A**.
- 13.35 HCC have commissioned consultants to undertake feasibility work on site IC3.
- 13.36 It is noted that there are 120 units proposed within Ickleford parish adjoining Lower Stondon, which is located within Bedfordshire. As children from this development would look to Lower Stondon for a school place, this development is discussed at 13.55 below.

Kelshall

- 13.37 HCC Property (Development Services) has no comments to make.

Kimpton

- 13.38 Funding will be sought through planning obligations to ensure the local education infrastructure can accommodate the additional demand arising from Site KM3.

Kings Walden

- 13.39 To ensure that the local education infrastructure can accommodate the additional demand arising from site KW1 funding will be sought through planning obligations.

Knebworth

- 13.40 The provision on 600 homes in Knebworth will result in a demand for 1.2FE of school places.
- 13.41 The existing primary school in Knebworth (with capacity for 2fe) is full and has no expansion capacity. There is therefore a requirement to identify an additional 1FE of primary capacity to cater for the need arising from the new homes. A new primary school site on the west of the Knebworth has been proposed. It would be preferable if the large sites could be phased to come forward together to support the delivery of additional primary places.
- 13.42 However, land adjacent to the existing primary school has been allocated as a housing site. The County Council would welcome a dialogue around exploring an alternative to the provision of a new primary school to the west of the town through the expansion of the existing Knebworth primary school to 3FE with provision of additional land.
- 13.43 Site KB4 includes 4ha of land for education purposes. Paragraph 13.193 suggests this could be for smaller scale secondary provision or an 'all-through school'. However, HCC have not identified a need for a secondary school in Knebworth.
- 13.44 The closest secondary schools to Knebworth are in south Stevenage. Long term proposed housing development and population growth suggests insufficient capacity within the existing secondary schools in Stevenage to accommodate future forecast demand.
- 13.45 HCC therefore object to site allocation KB4 as it is not providing secondary school infrastructure where it is required. As indicated in Section Four above, it would be prudent to reserve a secondary school site at Great Ashby and NE Stevenage to plan for future population pressures, since this is where there is a demand for places. Splitting the provision of school places to the north and south of Stevenage does not meet the need arising in Great Ashby and North East Stevenage. It is considered that with regard to the provision of secondary school places the plan has not been positively prepared as it is not providing infrastructure where it is required. In this regard the plan is considered to be unsound.
- 13.46 Knebworth has a small community library that is to be reprovided in a shared building with the NHS in 2017/18. It is anticipated that additional stock, shelving and IT would be required as a result of the proposed increase in population.

Langley

- 13.47 HCC Property (Development Services) has no comments to make.

Letchworth Garden City

- 13.48 A total of 1573 dwellings are proposed in Letchworth which equates to a demand for 3.2FE of school places.
- 13.49 As stated in Section Four above a new 2FE primary school site is required to be provided in site LG1.
- 13.50 To serve the demand arising from sites LG2 to LG10 additional school places would be required. These are to be provided through expansion of existing schools (financial contributions required), however, it would be prudent if the reserve school site allocation at Southern Way, which is on the proposals map of the current local plan, is carried forward into the new local plan and excluded from the Green Belt.
- 13.51 Feasibility work is required to establish if the existing secondary schools have sufficient expansion potential to meet the demand from the scale of development, particularly in light of the additional development at Highover Farm, Hitchin for 700 dwellings. The nearest secondary schools to this site would be in Letchworth.
- 13.52 Youth Connexions currently has no provision in Letchworth for the delivery of good quality youth work. They are seeking access to a rentable venue to provide this service.
- 13.53 The library in Letchworth is in a good location and well used. However, the current internal layout compromises the delivery of modern services. It is anticipated that additional stock, shelving and IT would be required as a result of the proposed increase in population.

Lilley

- 13.54 HCC Property (Development Services) has no comments to make.

Lower Stondon

- 13.55 The settlement of Lower Stondon lies within Central Bedfordshire. Site LS1 is located within Ickleford parish in North Hertfordshire but directly adjoins the Central Bedfordshire Council boundary.
- 13.56 The nearest schools to this development would be in Lower Stondon. Central Bedfordshire Council has advised that there may be some expansion potential at either Derwent Lower or Stondon Lower School. This development of 120 units is therefore not considered to impact upon the provision of school places in Ickleford.

Newnham

- 13.57 HCC Property (Development Services) has no comments to make.

Nuthampstead

- 13.58 HCC Property (Development Services) has no comments to make.

Offley

13.59 HCC Property (Development Services) has no comments to make.

Pirton

13.60 HCC Property (Development Services) has no comments to make.

Preston

13.61 Site PR1 includes the provision of 21 dwellings. To ensure that the local education infrastructure can accommodate the additional demand arising from site PR1 funding will be sought through planning obligations.

Radwell

13.62 HCC Property (Development Services) has no comments to make.

Reed

13.63 Funding will be sought to ensure the local education infrastructure can accommodate the additional demand arising from the 22 new homes proposed at Site RD1.

Royston

13.64 The primary population in Royston is increasing and, to ensure sufficient local places, HCC has provided an additional 1FE of permanent capacity within the First Schools in the town. All First schools are currently full and feasibility work suggests that there is limited further expansion capacity.

13.65 The proposed 1,049 homes in Royston results in the need for 2FE of school places. The provision of a new 2FE first school site at RY1 to ensure the future population and yield arising from the new housing across the town can access a local school place is supported.

13.66 Sites RY2 and RY10 include the following requirement

'Appropriate solution for education requirements arising from sites RY2 and RY10 having regard to up-to-date assessments of need'

13.67 630 homes are proposed at sites RY2 and RY10 resulting in a demand for 1.2FE of school places.

13.68 Site RY2 has planning permission which does not include a school site.

13.69 The education requirement at RY10 needs to be retained in the policy in the event that site RY1 does not come forward. However, this should refer to a new 2FE first school site.

13.70 Royston has a well located library that is considered fit for purpose. It is anticipated that additional stock, shelving and IT would be required as a result of the proposed increase in population.

Rushden

13.71 HCC Property (Development Services) has no comments to make.

Sandon

13.72 HCC Property (Development Services) has no comments to make.

St Ippolyts

13.73 The provision of 52 dwellings at sites SI1 and SI2 will result in a demand for 0.1FE of school places.

13.74 Current analysis indicates that there are sufficient places to meet the local population, however an increase of dwellings in the village may impact upon this and the additional yield may be difficult to accommodate at this school. St Ippolyts C of E (Aided) Primary has a PAN of 20. It is likely that additional classrooms would be required to expand the school to 1FE.

St Paul's Walden

13.75 Site SP2 allocates land for 41 units which would result in a requirement for an additional 0.1FE of school places.

13.76 Current analysis indicates that there are sufficient places to meet the local population; however this may be impacted upon by an increase of dwellings in the village. Feasibility advice indicates that the existing St Paul's Walden Primary site is confined but has some expansion potential. Funding will be sought to ensure the local education infrastructure can accommodate the additional demand arising from the proposed development.

Therfield

13.77 Current analysis indicates that there are sufficient places to meet the local population; however this may be impacted upon by an increase of dwellings in the village. Feasibility advice indicates that the existing site is confined but has some expansion potential. Funding will be sought to ensure the local education infrastructure can accommodate the additional demand arising from the 12 homes proposed at site TH1.

Wallington

13.78 HCC Property (Development Services) has no comments to make.

Weston

13.79 Current analysis indicates that there are sufficient places to meet the demand from the local population; however this may impact upon by an increase of dwellings in the village. Feasibility advice indicates that some expansion potential is available at the school. Therefore funding will be sought via planning obligations to ensure the local education infrastructure can accommodate the additional demand arising from the 40 units proposed at site WE1.

Wymondley

- 13.80 The allocation of site WY1 for 300 dwellings will result in a demand for an additional 0.6FE of school places.
- 13.81 The existing village school is 0.5FE and has expansion potential to 1FE on its existing site; however expansion beyond this would require additional land or the provision of a detached playing field. HCC are currently working with the developer of WY1 around an appropriate education solution for the area. This may involve the relocation of the existing school into the new development.

SECTION FIVE – IMPLEMENTATION MONITORING AND REVIEW

14.0 Delivery

- 14.1 It is important to emphasise the need for master planning particularly where a combination of larger sites has significant infrastructure impacts. The onus should be on applicants to demonstrate how infrastructure will be provided, and the necessary funding mechanism to achieve this. The LPA should also be seeking to coordinate with their neighbours where sites are inter-related, such as north of Stevenage.

15.0 Conclusion

- 15.1 HCC Property (Development Services), together with the HCC services represented, welcome the consultation and hope that the above comments and information are helpful.

Appendix A

Hertfordshire County Council's Education Statement

Hertfordshire County Council's Education Statement for North Herts

1.0 Introduction

- 1.1 To assist with interpreting the information provided, the background to the current situation regarding school places within the District, together with a definition of the terms used throughout this document, is given below.
- 1.2 Details of the known expansion potential of existing primary schools are provided. This information is based on existing feasibility work and does not take into account the cumulative effect of school expansion. For example, where schools are in close proximity to one another the expansion of one school may be limited by the expansion potential of another.

Role of the County Council

- 1.3 Hertfordshire County Council (HCC) is the local education authority and is subject to a number of statutory duties and responsibilities including:
- Promoting high standards of education
 - Planning and commissioning school places in its local authority area
 - Extending diversity and choice
 - Co-ordinating admissions in the normal admissions round for all maintained and some academy schools
 - Resourcing the shared maintenance, improvement to, and provision of, the built school environment, and securing value for money.
- 1.4 In coming to a view about the most appropriate strategy in response to development growth proposals, HCC is looking for a solution which takes into account each of these elements.

School Planning Context

- 1.5 HCC has a duty to secure sufficient school places in its area, ensuring that every child has access to a school place. HCC fulfils these planning responsibilities by forecasting the demand for school places in order to identify an appropriate balance between supply and demand. It negotiates the right number of places on an annual basis, whilst in parallel undertaking longer term strategic planning.

Meeting the Demand

- 1.6 Hertfordshire has experienced a significant rise in the demand for primary places across the County in recent years in line with the picture nationally. The rise is not consistent across the county, with some areas experiencing substantial increases in the primary aged population, whilst in some more rural areas demand is less pressing or currently remains fairly static. More information on the rising demand is available through HCC's strategy document '*Meeting the Demand for School Places*', available at <http://www.hertsdirect.org/services/edlearn/aboutstatesch/demand/>

Forecasts

- 1.7 HCC produces regular pupil forecasts for both Reception and Year 7 demand. At a primary level, HCC publish forecast four years ahead and secondary forecasts stretch to 10 years in the future.
- 1.8 These forecasts are based on actual data of 0-5 year olds in an area, historic pupil movement as well as an assumed pupil yield from new housing developments. The secondary forecasts take account of an assumed housing growth trajectory for the longer term, based on information provided by Hertfordshire's District and Borough Councils.
- 1.9 Latest forecasts are provided within the body of this response. These project demand for admissions into Reception and Year 7 (or Reception, Years 5 and Years 9 in areas which operate a three tier system) and do not include any margin. HCC would normally plan a level of surplus across an area to allow for fluctuations in forecast demand.
- 1.10 Further information on the methodology around the pupil forecasts can be found at www.hertsdirect.org/services/edlearn/aboutstatesch/planning/.

New Schools

- 1.11 The way in which new schools are set up has undergone significant change in recent years. The County Council's role as a commissioner of places is such that where it considered there is a basic need for a new school it must:
- Seek proposals to establish an academy/free school; or (if unsuccessful)
 - Hold a statutory competition; or (if unsuccessful)
 - Publish its own proposals for a new maintained school
- 1.12 The County Council remains responsible for providing the site and meeting all associated capital and pre/post-opening costs in instances where the new school provision is meeting basic need. Therefore, the County Council continues to hold the key role in negotiating S106 contributions for, and the provision of, all school infrastructure.

Principles

Forms of Entry

- 1.13 School provision is often described in terms of 'forms of entry'. 1 form of entry (FE) equals 30 places per year group.
- 1.14 Primary schools have seven year groups from Reception through to Year 6. HCC has a preference for primary schools of 2FE or more, as this larger size provides improved opportunities for delivery of a broad education curriculum and staff development, as well as offering the ability to better manage fluctuations in demand. A 2FE primary school will have 7 year groups of 60 pupils (420 in total), plus a Nursery class where offered.

- 1.15 Secondary schools have five year groups, from Year 7 through to Year 11. With few exceptions (such as Cheshunt School), the secondary schools within Hertfordshire operate sixth forms, providing lower and upper years groups at Years 12 and 13. HCC has a preference for secondary schools of 6 to 10f.e. as this offers improved opportunities for the delivery of a broad education curriculum. A 6FE school will have 5 year groups of 180 pupils (1080 in total) plus a Sixth Form.

Pupil Yield

- 1.16 When undertaking high level school place planning related to new residential development, HCC determines child yield based on a ratio of 1FE per 500 dwellings to be 97.5% confident of not underestimating yield.
- 1.17 This is based on a study of 49 Hertfordshire developments undertaken by HCC's demographer (c.2008). This work produced a yield range of 1FE per 500 dwellings (42 children per 100 dwellings/ 97.5% confidence) to 1FE per 850 dwellings (24.7 children per 100 dwellings/50% confidence).
- 1.18 The County Council applies the upper end of the range, 1FE per 500 dwellings, in the first instance to ensure prudent planning.
- 1.19 When considering actual proposals or planning applications, the County Council uses specific development forecasting models to ascertain more tailored demographic profiles, including pupil yields.

Developer Contributions

- 1.20 The co-ordination of new infrastructure provision to ensure that all development contributes appropriately to infrastructure requirements is an approach supported by HCC. We welcome an opportunity to continue with our joint working to determine the most effective trajectory for development. This will ensure that our services are able to deliver supporting infrastructure in a timely and efficient manner.
- 1.21 HCC is currently reviewing its Planning Obligations Toolkit to support the funding of infrastructure provision through S106 but we would seek to encourage the implementation of a CIL at the earliest opportunity. The cumulative impact of smaller sites can create additional demands and burdens on existing infrastructure which must be addressed through developer contributions. Since April 2015, the ability to pool S106 planning obligations is restricted and it is increasingly difficult to fund projects which mitigate the impact of smaller developments. The implementation of a CIL is currently the most viable option of supporting the development of these sites and the provision of infrastructure, particularly strategic infrastructure such as secondary schools.
- 1.22 HCC encourage the development of masterplans for strategic sites. This assists in delivering a transparent process whereby each

stakeholder is aware of their roles and responsibilities. This is particularly important where there are cross boundary issues associated with sites bordering neighbouring authorities, for example. It may also be necessary to consider how infrastructure contributions might be passed across administrative boundaries for cross boundary sites. For example, development directly adjacent to a settlement outside of your local authority administrative area might reasonably be expected to make contributions towards service provision at a neighbouring authority.

Site Size

- 1.23 School site standards have recently changed (School Premises Regulations 2012) and provide a much less stringent approach to school site standards. The County Council is now using the site areas that refer to Building Bulletin 103 area guidelines for mainstream schools.

Detached Playing Fields

- 1.24 A school should have all of the facilities it requires, including playing fields, provided on a single site.
- 1.25 There may, however, be situations where in order to provide additional school place capacity at an existing site a detached playing field may be required. For a primary school, this facility should ideally be located within 400 metres of the main school site and be appropriate to enable delivery of the PE curriculum.

Green Belt Boundaries

- 1.26 The Proposals Map appears to indicate that all school sites have been removed from the Green Belt.

Types of School

- 1.27 There is a diverse range of schools within Hertfordshire and HCC has the statutory duty to ensure sufficient school places within its area irrespective of how education is provided.
- 1.28 HCC is only the admitting authority for Community and Voluntary Controlled schools in the county.
- 1.29 All other schools (Academies, including Free Schools, Voluntary Aided and Foundation Schools) are their own admitting authorities, determining their own admissions policies and over-subscription criteria.
- 1.30 All admitting authorities' admissions rules and policies must abide by the Admissions Code but HCC, in its role as commissioner of places rather than as a provider, has no power to direct schools that are their own admitting authority to provide additional places. Therefore, the provision of any additional places will require the support of the school at the appropriate time.

Education Planning Areas

- 1.31 For the purposes of school place planning, HCC is divided into geographical education planning areas (EPAs). There are a total of 22 secondary EPAs within the county and each of these contains one or more primary EPAs (PPAs). The forecasts are produced to planning area level, not to individual schools.

2.0 Primary School

2.1 Details of the requirements for primary school places are contained in the responses to section 13 above.

2.2 A summary of the expansion potential of primary schools throughout the District is given below in Table 1. This summary is based upon desktop analysis. Detailed technical work would be required to confirm that any potential expansion is feasible.

Table 1 Current and Potential Capacity in North Herts Primary Schools November 2016

| School Planning Area | School | Current Capacity | Expansion Capacity | Comments |
|----------------------|---|------------------|--------------------|--|
| Baldock | Ashwell Primary School, Ashwell | 1FE | 0 | No expansion potential |
| Royston | Barkway VA (C of E) First School | 0.4FE | 0 | No expansion potential on existing site. Reserve site in the village. |
| Royston | Barley C of E (VC) First School | 0.5FE | 0 | Limited expansion potential |
| | Breachwood Green JMI School | 0.5FE | 0 | Small site, no expansion potential considered possible but need to investigate further |
| Hitchin | Cockernhoe Endowed C of E Primary School, Luton | 0.5FE | 0 | No expansion potential |
| Welwyn GC | Codicote C of E Primary VC School, Codicote | 2FE | +1FE | Temporary expansion by 1FE to 2FE Sept 2016. Additional land proposed in local plan to enable permanent expansion. |
| Letchworth | Garden City Academy, Letchworth | 1FE | +1FE | Potential to expand by 1FE. |
| Letchworth | Grange Junior School, Letchworth | 2FE | +1FE | Potential to expand to 3FE, but may need a DPF. |
| Stevenage | Graveley Primary School, Graveley | PAN16 | 0 | Possible expansion potential. DPF needed to expand to 1FE. |
| Baldock | Hartsfield JMI School, Baldock | 2FE | +1FE | Potential to expand to 3FE. Site located in an Area of Archaeological Significance and designated as a Scheduled Ancient Monument. |
| Hitchin | Hexton JMI School, Hitchin | PAN10 | 0 | No expansion potential |
| Hitchin | Highbury Infant School & Nursery, Hitchin | 2FE | 0 | No expansion potential |
| Hitchin | Highover JMI & Nursery School, Hitchin | 2FE | 0 | No expansion potential. |
| Letchworth | Hillshott Infant School & Nursery, Letchworth | 2FE | 0 | No expansion potential |
| Hitchin | Ickleford Primary School, Ickleford | 1FE | 0 | No expansion potential |
| Letchworth | Icknield Infant and Nursery School, Letchworth | 3FE | 0 | No expansion potential |
| Royston | Icknield Walk First School, Royston | 2FE | +1FE | Potential expansion to 3FE, however highways constraints may restrict this potential. |
| | Kimpton Primary School, Kimpton | 1FE | 0 | No expansion potential without additional land or DPF. |
| Stevenage | Knebworth Primary and Nursery School, Knebworth | 2FE | 0 | No expansion potential without additional land or DPF. |
| Letchworth | Lordship Farm Primary School, | 2FE | 0 | No expansion potential |

*HCC Property Representations to North Herts District Council on behalf of HCC services
Regulation 19 Local Plan Consultation*

| School Planning Area | School | Current Capacity | Expansion Capacity | Comments |
|----------------------|---|------------------|--------------------|---|
| | Letchworth | | | |
| Hitchin | Mary Exton Primary School, Hitchin | 1FE | +1FE | Possible expansion potential to 2FE, but will need a DPF. |
| Letchworth | Northfields Infant & Nursery School, Letchworth | 2FE | | Potential expansion to 3FE, but challenging due to site size |
| Letchworth | Norton St Nicholas Church of England (VA) Primary | 1FE | 0 | No expansion potential |
| Hitchin | Offley Endowed Primary School, Offley | PAN20 | 0 | Limited expansion potential. PAN increased from 19 to 20 in 2015. |
| Hitchin | Oughton Primary and Nursery School, Hitchin | 1FE | +1FE | Potential to expand to 2FE. |
| Hitchin | Our Lady Catholic Primary School, Hitchin | 1FE | +1FE | Potential to expand to 2FE. |
| Hitchin | Pirton School, Pirton | PAN21 | +0.3FE | Potential to expand to 1FE. |
| Letchworth | Pixmore Junior School, Letchworth | 2FE | 0 | No expansion potential. |
| Hitchin | Preston Primary (VC) School, Preston | 0.5FE | +0.5FE | Potential to expand by up to 0.5FE, but dependent on DPF or acquisition of adjoining land. |
| Hitchin | Purwell Primary School, Hitchin | 1FE | 1FE | Possible expansion potential to 2FE, but will need a DPF. |
| Royston | Reed First School, Reed | PAN12 | 0 | Limited expansion potential |
| Royston | Roman Way First School, Royston | 2FE | 0 | No expansion potential |
| Stevenage | Round Diamond Primary School, Stevenage | 2FE | 0 | No expansion potential. |
| Hitchin | Samuel Lucas JMI School, Hitchin | 2FE | 0 | No expansion potential |
| Baldock | Sandon JMI School, Sandon | PAN14 | 0 | No expansion potential. |
| Hitchin | St Andrew's C of E VA Primary School & Nursery | 1FE | 0 | No expansion potential. |
| Hitchin | St Ippolyts C of E (Aided) Primary School | PAN20 | +0.3FE | Potential to expand to 1FE, but likely to require a DPF or acquisition of adjoining land. |
| Baldock | St John's RC Primary School, Baldock | 1FE | 0 | No expansion potential. |
| Royston | St Mary's Catholic Primary School, Royston | 1FE | +1FE | Potential to expand to 2FE. |
| Baldock | St Mary's Church of England (VC) Infant School, Baldock | 2FE | +1FE | Potential to expand to 3FE. |
| Baldock | St Mary's Church of England (VC) Junior School, Baldock | 2FE | +1FE | Potential to expand to 3FE. |
| Hitchin | St Paul's Walden Primary School, Hitchin | PAN 17 | +0.4FE | Potential to expand to 1FE |
| Letchworth | St Thomas More Catholic Primary School, Letchworth | 1FE | 0 | No expansion potential. |
| Letchworth | Stonehill School, Letchworth Garden City | 1FE | +1FE | Potential to expand subject to removal of mobile classrooms on site. |
| Hitchin | Strathmore Infant and Nursery School, Hitchin | 2FE | +1FE | Potential to expand subject to widening the access road (linked with Wilshere-Dacre Junior Academy) |
| Royston | Studlands Rise First School, Royston | 1FE | 0 | No expansion potential |
| Royston | Tannery Drift School, Royston | 2FE | 0 | No expansion potential |
| Royston | Therfield First School, Therfield | PAN11 | 0 | Limited expansion potential may need a DPF. |
| Baldock | Weston Primary School, | PAN20 | 0 | Possible expansion to 1FE, but |

*HCC Property Representations to North Herts District Council on behalf of HCC services
Regulation 19 Local Plan Consultation*

| School Planning Area | School | Current Capacity | Expansion Capacity | Comments |
|----------------------|--|------------------|--------------------|--|
| | Weston | | | challenging site |
| Hitchin | Whitehill Junior School, Hitchin | 2FE | 0 | Some expansion potential with DPF. Linked to Highbury Infs where no expansion potential |
| Letchworth | Wilbury Junior School, Letchworth | 3FE | 0 | No expansion potential |
| Hitchin | The William Ransom Primary School, Hitchin | 2FE | 0 | No expansion potential |
| Hitchin | Wilshere-Dacre Junior Academy, Hitchin | 2FE | +1FE | Possible expansion potential to 3FE, but likely to need additional playing field space. (Linked with Strathmore Infant School) |
| Hitchin | Wymondley JMI School, Little Wymondley | 0.5FE | 0.5FE | Possible expansion potential to 1FE. |

DPF = detached playing field

3.0 Secondary Schools

- 3.1 Strategic planning at secondary school level is more complex, comprising a more diverse offer of schools and with secondary aged pupils tending to often travel further for their education resulting in the need to plan over a wider geographical area.
- 3.2 The following information includes an analysis of the current position regarding secondary school places using school place planning areas.
- 3.3 There are four secondary education planning areas (SPA) within North Herts. These are:
- Baldock
 - Hitchin
 - Letchworth Garden City
 - Royston (three tier system)
- 3.4 Information on each of these areas is given below.

Baldock

Proposed Housing Numbers

- 3.5 The proposed site allocations of 3386 dwellings in Baldock (including 300 homes to be built beyond 2031), together with the additional 33 homes proposed in Ashwell and 40 dwellings proposed in Weston would yield around 7.2FE of demand.
- 3.6 It should be noted that the Local Plan period extends beyond the lifecycle of HCC pupil forecasts and therefore the demand from both the existing population (the pupils of which are not yet born) as well as new housing will continue to impact demand beyond 2026/27.

Existing Secondary Provision

- 3.7 There is currently one secondary school in Baldock SPA, Knights Templar School (KTS) which offers 7FE of secondary provision. This equates to a Published Admission Number (PAN) of 210 Year 7 places.
- 3.8 KTS is an Academy and therefore its own admitting authority and outside Local Authority control. The school has recently changed its admissions arrangements to prioritise children within its Priority Area over those siblings living outside of the Priority Area.
- 3.9 Current forecasts project a deficit of Year 7 places across Baldock, however the forecast takes account of historic migration patterns and there has historically been an inflow of pupils from Letchworth, which is likely to stem in coming years as the population within the Baldock priority area grows.

| 2.0 BALDOCK | | ACTUALS | | | FORECAST | | | | | | | | | | |
|-------------|-----------------------------------|------------------------|---------|---------|----------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| NO | SCHOOL | School admissions 2016 | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 |
| 1 | Knights Templar | 210 | 210 | 209 | | | | | | | | | | | |
| | Number of Year 7 places available | 210 | 210 | 209 | 210 | 210 | 210 | 210 | 210 | 210 | 210 | 210 | 210 | 210 | 210 |
| | Demand | | | | 216 | 215 | 217 | 245 | 246 | 263 | 277 | 285 | 269 | 267 | 266 |
| | Surplus/Shortage | | | | -6 | -5 | -7 | -35 | -36 | -53 | -67 | -75 | -59 | -57 | -56 |
| | % Surplus/Shortage | | | | -2.9% | -2.4% | -3.3% | -16.7% | -17.1% | -25.2% | -31.9% | -35.7% | -28.1% | -27.1% | -26.7% |
| | No of FE | | | | -0.2 | -0.2 | -0.2 | -1.2 | -1.2 | -1.8 | -2.2 | -2.5 | -2.0 | -1.9 | -1.9 |

3.10 Without further demand arising from new housing, the actual existing overall school aged population living in Baldock is around 7FE and therefore KTS is the right size to meet the demands of the local community.

3.11 Property feasibility work has been undertaken to establish the expansion potential of KTS. This feasibility indicates that KTS has some expansion potential, but not enough to accommodate an additional 7FE of demand.

Conclusion on Baldock Secondary

3.12 A new 6 to 8FE secondary school site within the development to the north of the railway has been sought. When this new provision will be brought forward will depend upon the timing and phasing of the new housing.

Hitchin

Proposed Housing Numbers

3.13 The total of 1009 units proposed for Hitchin Town would yield a demand for school places of around 2FE. However, it is important to note that this total does not take into account new housing proposed in Hitchin villages; areas which traditionally look to Hitchin for secondary provision. This proposed housing totals a further 1,675 dwellings (Codicote, Ickleford, Lower Stondon, Kimpton, King's Walden, Knebworth, Preston, St Ippolyts, St Paul's Walden and Wymondley), which equates to around 3.4FE of pupil yield.

Existing Secondary Provision

3.14 There are three secondary schools in Hitchin; The Priory (6FE), Hitchin Girls' School (5.5FE) and Hitchin Boys' School (5.5FE).

3.15 There is some inflow into the town which is expected as the two single sex schools have a wider priority area and therefore recruit from a wider area including Letchworth and the Hitchin villages.

3.16 Current forecasts indicate an immediate deficit of places in the area and therefore additional capacity is required to meet this demand.

| 4.0 HITCHIN | | ACTUALS | | | FORECAST | | | | | | | | | | |
|-------------|-----------------------------------|------------------------|---------|---------|----------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| NO | SCHOOL | School admissions 2016 | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 |
| 30 | Hitchin Boys | 165 | 165 | 169 | | | | | | | | | | | |
| 31 | Hitchin Girls | 165 | 172 | 170 | | | | | | | | | | | |
| 33 | Priory (The) | 210 | 179 | 212 | | | | | | | | | | | |
| | Number of Year 7 places available | 540 | 516 | 551 | 540 | 510 | 510 | 510 | 510 | 510 | 510 | 510 | 510 | 510 | 510 |
| | Demand | | | | 543 | 541 | 601 | 614 | 640 | 668 | 680 | 723 | 698 | 706 | 665 |
| | Surplus/Shortage | | | | -3 | -31 | -91 | -104 | -130 | -158 | -170 | -213 | -188 | -196 | -155 |
| | % Surplus/Shortage | | | | -0.6% | -6.1% | -17.8% | -20.4% | -25.5% | -31.0% | -33.3% | -41.8% | -36.9% | -38.4% | -30.4% |
| | No of FE | | | | -0.1 | -1.0 | -3.0 | -3.5 | -4.3 | -5.3 | -5.7 | -7.1 | -6.3 | -6.5 | -5.2 |

- 3.17 In light of the rising demand for secondary provision in Hitchin, proposals have been brought forward to expand both Hitchin Boys' School and Hitchin Girls' School by 1.5FE each from 2018 to provide an additional 3FE of permanent capacity to meet demand from the existing community. Alongside this, both schools are considering changes to their admissions arrangements in order to prioritise further children from Hitchin.
- 3.18 The proposed expansion of Hitchin Girl's and Hitchin Boy's to 7FE will utilise all identified expansion potential in these sites. The Priory School will remain the only school in Hitchin with expansion potential. Feasibility advice indicates the site has expansion potential up to 9FE (i.e. +3FE). However as a Foundation School, The Priory is its own admitting authority and as such the County Council has no authority to direct it to offer additional places. The willingness of The Priory School to expand is therefore a key consideration in the provision of sufficient places to meet future demand for secondary places in Hitchin.

Conclusion on Hitchin Secondary

- 3.19 There are current expansion proposals for the two single sex secondary schools in the town, which leaves The Priory School as the only school with expansion potential. Achieving this is dependent upon the willingness of the School to expand to offer sufficient places to meet long term need.
- 3.20 We welcome the removal of the Green Belt designation at The Priory School as it would enable a more flexible policy approach for the future.
- 3.21 However, with a total of over 5FE of additional demand possible from the proposed scale of new housing in and around Hitchin, further secondary capacity beyond that possible at The Priory School needs to be identified.

East of Luton

- 3.22 A proposal for 2100 homes to the East of Luton would generate 4.3FE of secondary school places.
- 3.23 As outlined above, there is no available capacity in the closest Hertfordshire secondary schools in Hitchin which are currently full and already implementing expansion proposals to meet local need. Discussions with Luton Borough Council confirm that it has no existing secondary capacity to meet the needs from the yield arising from any new housing proposed at East of Luton.
- 3.24 Therefore a new school site is required to meet the need from this proposed development.
- 3.25 It is requested that the area as a whole is master planned, as the appropriate delivery of sufficient secondary capacity for the

development as a whole is problematic if the individual sites are managed in isolation. The provision of an all-through school within the development could be considered as a way of managing the primary and secondary yield arising from this new housing.

- 3.26 In light of the demand arising from Hitchin, the County Council would seek a larger secondary school (of at least 6FE) to meet the needs both arising from the new development as well as the needs of surrounding Hitchin villages for whom this new secondary school would become their closest Hertfordshire school. There may be an opportunity to expand this school further should Luton Borough Council wish to address some of its secondary demand issues through the provision of additional capacity at East of Luton.

Letchworth

Proposed Housing Numbers

- 3.27 The proposed housing allocations total 1523 units which equates to 3FE of demand.

Existing Secondary Provision

- 3.28 There are two secondary schools in Letchworth – Fearnhill (5FE) and The Highfield (6FE).
- 3.29 The latest forecast indicates sufficient places to meet forecast demand in Letchworth.

| LETCHWORTH | | ACTUALS | | | | FORECAST | | | | | | | | | |
|--|------------------------|---------|---------|---------|---------|----------|---------|---------|---------|---------|---------|---------|---------|---------|--|
| SCHOOL | School admissions 2016 | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | |
| Fearnhill | 150 | 65 | 89 | | | | | | | | | | | | |
| Highfield (The) | 180 | 179 | 178 | | | | | | | | | | | | |
| Da Vinci School of Creative Enterprise | 0 | 53 | 44 | | | | | | | | | | | | |
| Number of Year 7 places available | 330 | 244 | 267 | 330 | 330 | 330 | 330 | 330 | 330 | 330 | 330 | 330 | 330 | 330 | |
| Demand | | | | 276 | 260 | 271 | 276 | 292 | 296 | 311 | 321 | 323 | 314 | 288 | |
| Surplus/Shortage | | | | 54 | 70 | 59 | 54 | 38 | 34 | 19 | 9 | 7 | 16 | 42 | |
| % Surplus/Shortage | | | | 16.4% | 21.2% | 17.9% | 16.4% | 11.5% | 10.3% | 5.8% | 2.7% | 2.1% | 4.8% | 12.7% | |
| No of FE | | | | 1.8 | 2.3 | 2.0 | 1.8 | 1.3 | 1.1 | 0.6 | 0.3 | 0.2 | 0.5 | 1.4 | |

- 3.30 Property feasibility work is being undertaken currently to establish the expansion potential of these schools.

Conclusion on Letchworth Secondary

- 3.31 There is some existing outflow to Hitchin and to Baldock for secondary provision. However, as indicated above, this is likely to change in coming years due to admissions rules changes at both Knights Templar in Baldock and Hitch Girls and Hitchin Boys' Schools. The forecast demand is likely to be impacted in future years as a result of the push back from Baldock and Hitchin as well as from the yield arising from the proposed new housing.
- 3.32 HCC would therefore seek appropriate and adequate developer contributions to provide for the infrastructure requirements arising from future housing developments in the area, and also requests policies

within the District Plan that provide the flexibility to develop existing school sites where possible and necessary.

Royston (middle and upper)

3.33 Royston and the villages operate a three-tier system of first, middle and upper schools, with four first schools and a Catholic primary school serving Royston Town, and four further first schools located in the outlying villages. Two middle schools (Roysia and Greneway) and Meridian Upper School serve the wider planning area.

3.34 The proposed housing allocations total 1049 new dwellings which equates to around 2FE of pupil yield.

Middle School Strategy

3.35 There are two middle schools in the Royston secondary EPA offering a total of 210 places, Roysia (3FE) and Greneway (4FE).

| 3.1 ROYSTON MIDDLE | | | ACTUALS | | | | FORECAST | | | | | | | | | |
|--------------------|-----------------------------------|------------------------|---------|---------|---------|---------|----------|---------|---------|---------|---------|---------|---------|---------|---------|--|
| NO | SCHOOL | School admissions 2016 | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | |
| 77 | Roysia Middle | 90 | 43 | 42 | | | | | | | | | | | | |
| 78 | Greneway (The) | 120 | 102 | 116 | | | | | | | | | | | | |
| | Number of Year 5 places available | 210 | 145 | 158 | 210 | 210 | 210 | 210 | 210 | 210 | 210 | 210 | 210 | 210 | 210 | |
| | Demand | | | | 179 | 176 | 197 | 206 | 221 | 246 | 236 | 223 | 207 | 226 | 210 | |
| | Surplus/Shortage | | | | 31 | 34 | 13 | 4 | -11 | -36 | -26 | -13 | 3 | -16 | 0 | |
| | % Surplus/Shortage | | | | 14.8% | 16.2% | 6.2% | 1.9% | -5.2% | -17.1% | -12.4% | -6.2% | 1.4% | -7.6% | 0.0% | |
| | No of FE | | | | 1.0 | 1.1 | 0.4 | 0.1 | -0.4 | -1.2 | -0.9 | -0.4 | 0.1 | -0.5 | 0.0 | |

3.36 Although there is currently around 1FE of surplus in the middle schools, the latest forecast indicates a rising demand for middle school places with a peak deficit in 2020/21 where a need for an additional 1.2FE of capacity is required. This reflects the recent rise in demand at reception and the County Council's permanent expansion proposals which increased First School places in Royston by +1FE in 2015.

3.37 The County Council is engaged with the Middle Schools in the town to explore the scale of need and possible options, should they be required to meet peak demand in 2021.

3.38 There is currently a small outflow of pupils from the Royston education planning area into Buntingford Middle Schools, mainly from families living in the southern Royston villages for whom Buntingford is their nearest school. However, as demand within Buntingford increases from both the existing population and yield from new housing, this may result in pupils living further afield no longer being able to gain a place.

3.39 It is worth noting that if the pressure in neighbouring areas results in a pushback, further capacity will be required in Royston to cater for these displaced pupils.

3.40 Assuming the existing schools are full, current forecasts indicate an additional 1FE of demand would be required to meet peak demand from 2021/22. There is also a need to identify the potential for a further +3FE of capacity across the middle school estate in Royston to ensure

sufficient capacity to meet all the potential yield arising from proposed new housing growth for the long term.

Upper School Strategy

3.41 There is one upper school in the Royston secondary EPA offering a total of 213 places, The Meridian (7.1FE).

| 3.0 ROYSTON UPPER | | ACTUALS | | | FORECAST | | | | | | | | | | |
|-------------------|-----------------------------------|------------------------|---------|---------|----------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| NO | SCHOOL | School admissions 2016 | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 |
| 79 | Meridian (The) | 213 | 129 | 114 | | | | | | | | | | | |
| | Number of Year 9 places available | 213 | 129 | 114 | 213 | 213 | 213 | 213 | 213 | 213 | 213 | 213 | 213 | 213 | 213 |
| | Demand | | | | 129 | 127 | 127 | 142 | 162 | 166 | 180 | 183 | 190 | 201 | 191 |
| | Surplus/Shortage | | | | 84 | 86 | 86 | 71 | 51 | 47 | 33 | 30 | 23 | 12 | 22 |
| | % Surplus/Shortage | | | | 39.4% | 40.4% | 40.4% | 33.3% | 23.9% | 22.1% | 15.5% | 14.1% | 10.8% | 5.6% | 10.3% |
| | No of FE | | | | 2.8 | 2.9 | 2.9 | 2.4 | 1.7 | 1.6 | 1.1 | 1.0 | 0.8 | 0.4 | 0.7 |

3.42 Current forecasts indicate there is sufficient capacity within the Upper School in the town to meet the needs arising from the existing population and some of the pupil yield from the planned new housing. Analysis of pupil dynamics confirms that currently around 1FE of pupils living in the Royston planning area travel to Buntingford for their Upper School provision.

3.43 However, with rising demand in Buntingford from its local community, this is likely to result in Royston pupils being unsuccessful in seeking a place in a Buntingford school in the future.

3.44 Taking into account current forecasts and the possible impact of Royston pupils no longer being able to access Upper School provision in Buntingford, the demand for Upper School places in Royston is anticipated to increase with the subsequent forecast surplus reducing to around 1FE.

3.45 To ensure sufficient places for the long term, the potential Upper School capacity in Royston therefore needs to be sufficient to cater for both rising demand from the local community and an anticipated pupil yield from proposed new housing.

3.46 Feasibility work is ongoing to confirm the expansion potential of the existing middle and upper school sites in Royston.

Conclusion on Royston Middle and Upper

3.47 In conclusion, our assessment based on current information indicates the need to identify:

- Potential capacity for up to an additional +3/4FE in the middle school sector
- Potential capacity for up to an additional +2/3FE in the upper school sector to meet the anticipated housing growth across the town

Appendix 1

School Expansions Process – School enlargement (prescribed alteration)

- Identification of need
 - Meeting the Demand for School Places
 - Pupil forecasts
 - Engage with local Head Teacher groups
- Analysis of need in identified areas
 - Analysis of demand
 - Property feasibility work on potential for school sites to expand
 - Work with multi-disciplinary teams to identify possible options
 - Engage with schools in area of need to explore options
- Options Recommendation and decision to consult
 - Assessment of options against the Director's Four Tests which considers whether the options:
 - Provide the right number of places in the right place to meet demand
 - Enhance capacity to raise educational standards, reduce risk of under-performance or serious weakness, and offer extended schools
 - Have acceptable implications for building design, environmental impact, and cost
 - Have acceptable transitional arrangements for affected pupils
- Statutory consultation on enlargement proposal
- Engagement with School on building design for enlargement
- Formal statutory decision taken by County Council
- Submission of town planning application for building enlargement, including external play areas and associated car parking requirements
- Project completion and additional places made available

Appendix B

Free Early Education and Childcare Provision

Free Early Education and Childcare Provision

Lead agency

Hertfordshire County Council

Evidence base

Liaison with Hertfordshire County Council

Childcare Sufficiency Report, Hertfordshire County Council April 2016

Current situation and Context

Section 6 of the Childcare Act 2006 places a duty on all local authorities to secure sufficient childcare for working parents or parent who are studying or training for employment for children aged 0 to 14 years (19 for disabled children). The County Council has also a statutory responsibility to provide universal Free Early Education (FEE) for 3 and 4 year olds. Since September 2013 HCC also has a statutory responsibility to provide 15 hours FEE to eligible vulnerable 2 year old children across Hertfordshire.

In September 2017 a new extended entitlement of an additional 15 hours free childcare will be introduced for working parents in Hertfordshire. HCC is currently working on the likely demand across Hertfordshire linked to the number of places available. Consequently demand for these services is forecast to increase, in addition to the increasing population of young children in the county. Provision for this new entitlement will be within schools, preschools, day nurseries and childminders.

In addition to FEE places, HCC also has a duty to ensure there are sufficient childcare places for 0 to 14 year old children (19 for children with S.E.N.D.) in preschools, day nurseries and out of school clubs which can run either from school locations, or other community facilities.

The local authority also has a duty to provide Children's Centres in every community, for children under 5 and their families. These provide a range of services at designated Children's Centres and community venues, such as community centres and schools.

Children's Centres work in partnership with a number of partners including schools, midwives, health visitors and GPs. They offer services to support child development; outreach and family support; parenting support; access to training and work opportunities; and child and family health services. There 82 Children's centres in Hertfordshire clustered in 29 geographical groups.

There are ten centres in the North Herts area which serve a defined geographical area. The Children's Centre Areas are numbered NH1 to NH10 and their geography is used for the purpose of planning early year's provision (the different types of early years provision including Children's Centres are more fully explained in Appendix 1).

HCC currently RAG rates the sufficiency levels for 2, 3, and 4 year olds FEE places and the 30 hour free childcare offer in all Children's Centre Areas:

The key data is measured as follows:

- Green = sufficient places available (provision largely matches family's needs)
- Amber = near sufficient places available (a gap exists which may give families difficulties in accessing provision)
- Red = insufficient places available (a gap exists which may prevent families from accessing provision)

The latest information held by HCC regarding the 10 NHDC Children's Centres is shown in the RAG table below

| Children's Centre | FEE for 2, 3 & 4 years old places available to parents 2016/2017* | 30 hours free childcare places available to parents of 3 & 4 year old children from Sept 2017 |
|---------------------------------|---|---|
| NH1 Royston and the Villages | + 204 GREEN | +30 GREEN |
| NH2 Baldock, Ashwell and Weston | +266 GREEN | +160 GREEN |
| NH3 Letchworth North | +146 GREEN | +59 GREEN |
| NH4 Letchworth North East | + 79 GREEN | -29 RED * |
| NH5 Letchworth South | -50 RED * | -110 RED * |
| NH6 Oughton and Villages | + 224 GREEN | + 111 GREEN |
| NH7 Hitchin North East | + 152 GREEN | + 42 GREEN |
| NH8 Hitchin South | + 74 GREEN | -55 RED * |
| NH9 Graveley and Great Ashby | +126 GREEN | +52 GREEN |
| NH10 Knebworth and Woolmer | +149 GREEN | +78 GREEN |
| Green | | |

FEE – Free Early Education

* Data suggests that there are insufficient places in the given area

The rating for any area can quickly change if, for example, a preschool or nursery was to reduce the number of children it could accommodate; or if a preschool or nursery were to close. Future requirements will depend on a number of factors, including changes in birth rate; level of provision; changes in regulations; and new government initiatives relating to the sector.

Identified Infrastructure Requirements

North Herts is the seventh most deprived area in the county. The number of working households is higher than other areas of the county. The demand for the new extended childcare entitlement will be high, and additional childcare provision will be required in those areas identified as insufficient or near to sufficient to support this new demand. If more private housing is developed than the demand for these places will increase further.

Current data indicates that three Children's Centre areas do not have sufficient places to meet the new entitlement from September 2017.

Two of the 10 Children's Centre areas in North Herts area fall into the 30% most disadvantaged within the county. As the 2 year old FEE scheme is only available for disadvantaged children, this indicates that the need for these places will be higher in these areas than the rest of the County.

The Local Plan Consultation indicates that a large number of houses will be built around the Letchworth, Hitchin, Royston town areas and a significant new housing North of Offley. This will impact greatly on provision in these areas and pressure will grow on both the FEE places and the new 30 hour childcare offer to parents over time. From local knowledge and data collected HCC are already aware of a pressure for places within the Letchworth area.

Appendix 1

Early Years and Types of Provision

HCC has a duty to secure sufficient free early education (FEE) and childcare places. Annually the County Council publishes a Childcare Sufficiency Report which details where places are required across the county. HCC works with the private, voluntary and independent (PVI) sector and schools to ensure adequate places. It also assists and enables the provision of day nurseries, play schemes and after school clubs, making sure there are sufficient places for parents to access across the county. The 15 hours of FEE can be provided in maintained provision (e.g. school) or the PVI

Free Early Education (FEE) is a central government funded scheme whereby all children from the term after which they are 3 years old until they reach school age are eligible for a free place for a maximum of 15 hours per week (maximum 38 weeks or a total of 570 hours per year). The free place can be offered in a state maintained school or through PVI provision such as a preschool, day nursery or childminder. Where new primary school sites are identified, early education (nursery) provision will usually be sought as part of the onsite provision. From September 2013 HCC also has a statutory responsibility to provide 15 hours early education to eligible 2 year old children across Hertfordshire.

Maintained Nursery School are funded by the state where only children aged 3 and 4 receive their FEE entitlement before attending primary school. There are 15 such schools in Hertfordshire.

Maintained nursery classes are based in primary schools where children aged 3 and 4 received their FEE entitlement until they move up to reception.

Preschool/Playgroup provision usually educates children between the ages of 2 and school age. These settings are often able to offer FEE to eligible 2 year olds as well as all 3 and 4 year olds. These settings are run by PVI providers in local communities and some children attending will be accessing their free early education place and others will be accessing additional services for which parents pay. These settings will usually be set up in community buildings or schools and will usually be open term time only.

Day Nurseries offer childcare and early education for children aged from 0 to 5 years old. These settings are used predominately by working parents for childcare purposes. They also usually offer FEE for eligible children but with most children accessing additional services for which parents pay. This provision is market led.

Childcare HCC has a statutory duty to ensure there is sufficient childcare for working parents. This duty covers 0 to 14 year olds (19 years for children with S.E.N.D.). Childcare can take place in preschools, day nurseries, childminders, and out of school provision, such as holiday clubs and after school clubs depending on the age of the child. It can take place in school

buildings or community use buildings. New schools should be designed to be able to offer FEE/childcare to children (aged 2 years upwards)

Hertfordshire Sure Start Children's Centres

Legislation about children's centres is contained in the Childcare Act 2006. The Act places a duty on local authorities to improve the well-being of young children in their area and reduce inequalities between them. Specifically they must:

- ensure there are sufficient children's centres to meet local need
- ensure each children's centre is within the remit of an Advisory Board
- ensure there is consultation before any significant changes are made to children's centre provision in their area
- ensure that the local authority, local commissioners of health services and Jobcentre Plus jointly consider whether the early childhood services they provide should be provided through children's centres in the area
- ensure that after receiving a report from Ofsted following the inspection of a children's centre an action plan is prepared and published.

The core purpose of Children's Centres, as defined by the Department for Education (DfE), is to improve outcomes for young children and their families, with a particular focus on those families in greatest need of support. Centres are expected to support:

- **Child development and school readiness** - supporting personal, social and emotional development, physical development and communication and language from pre-birth to age 5, so children develop as confident and curious learners and are able to take full advantage of the learning opportunities presented to them in school.
- **Parenting aspirations and parenting skills** - building on strengths and supporting aspirations, so that parents and carers are able to give their child the best start in life.
- **Child and family health and life chances** - promoting good physical and mental health for both children and their family; safeguarding; supporting parents to improve the skills that enable them to access education, training and employment; and addressing risk factors, so that children and their families are safe, free from poverty and able to improve both their immediate wellbeing and their future life chances.

Number of Hertfordshire Centres

There are 82 Children's Centres in the county, of which 10 are located in North Herts. The centres were developed in three phases between 2004 and 2010. At that time, each centre covered a geographical area containing an average of 800 children aged 0 to 4 years (0 to 4s means all children under the age of 5).

Population The population of children aged 0 to 4 in Hertfordshire is 74,492 (Mid Year Estimate 2011). 81% of children aged 0 to 4 are currently registered with a Children's Centre. The population of 0 to 4's has increased by 10,000

children from 2005 when the programme of centres was being planned. As population has grown, the average catchment for each Children Centre area is now 1000 children.

Children's Centre Premises There are 73 Children's Centre buildings which received DfE capital funding for extensions/refurbishment. The terms of the DfE grant mean that the premises must be used for delivery of Children's Centre/early years services and that DfE reserves a right to claw back the capital funding if the premises are no longer used for these purposes. Some provision is delivered through shared use of community buildings where no dedicated location was identified. All Children's Centre utilise some community buildings to deliver their wide range of services and make them accessible to the whole community.

How Centre Services Are Delivered

All centres are commissioned. Contracts are in place between Hertfordshire County Council (HCC) and 50 lead agencies to manage the centres.

Children's centres offer access to a range of early childhood services aimed at supporting parents-to-be, young children aged under five and their families. These include;

- Activities (e.g. stay and play sessions, toddler groups) and information (e.g. early education and childcare, pre-schools, day nurseries) for families
- Outreach and family support
- Evidence-based parenting programmes (Family Links Nurturing Programme is delivered by some centres in Hertfordshire)
- Access to adult learning and employment support (this may include language, literacy and numeracy support, family learning, access to apprenticeships and volunteering opportunities as steps toward employment and links to Jobcentre Plus)
- Child and family health services (delivered by community midwives and health visitors).

Children's centres aim to meet the needs of their local families so services offered by centres will vary according to the population served by the centre.

Appendix C

Youth Connexions Hertfordshire

Background to Youth Connexions Hertfordshire

Legislation^[1] requires that local authorities have a “responsibility to ensure young people have access to sufficient educational leisure-time activities which are for the improvement of their well-being and personal and social development, and sufficient facilities for such activities; that activities are publicised; and that young people are placed at the heart of decision making regarding the youth work/positive activity provision.” To clarify the Government’s expectations of local authorities, the Department of Education published the Statutory Guidance for Local Authorities on Services and Activities to Improve Young People’s Well-Being (June 2012).

The focus of HCC Youth Connexions (YCH) is prevention and early intervention. It supports young people by providing high quality informal education opportunities to promote young people’s personal and social development, enabling them to make informed decisions, have a place in their community and ultimately, to reach their potential and make a successful transition to adulthood. This will enable young people to:

- Make informed decisions based on the information which is available to them, thereby avoiding risky behaviour.
- Be confident that they can present their views, including those of others, and influence decisions.
- Develop resilience by knowing how they can help themselves and others.
- Recognise when they need support and where they can go to access it.
- Be able to recognise and develop healthy relationships thereby being less vulnerable to CSE.
- Develop a sense of purpose and self-belief, and recognise what they contribute to society thus ensuring a sense of emotional well-being and positive mental health.

All HCC Youth Connexions youth work is delivered through planned curriculum programmes which are based on identified need resulting in recordable personal and social development outcomes. Needs are identified in a variety of ways: through the planning and evaluation process; coproduction with young people; through consultation with stakeholders, elected Members and the local 11-19 Youth Strategy Groups. Outcomes are identified and a programme of work is designed and delivered. Delivery can be through a variety of media depending on the needs and interests of the young people, e.g. through sports, music, drama, art, peer mentoring, outdoor education etc. The outcomes, however, will be linked to at least one of the key curriculum areas: drugs and smoking, alcohol, sexual health and relationships emotional wellbeing including bullying and cyber bullying, youth engagement including youth councils, forums, UKYP, Herts1125, decision making, volunteering, preparation for education, training or work, youth crime and personal safety, ethnicity, diversity and culture, health and fitness, resilience.

Once a piece of work is completed, it is evaluated by young people and staff. The results of the evaluation are used in the development of future work.

Whilst Youth Connexions youth work provision is accessible to all young people aged 13 to 19 (up to 25 for young people with learning disabilities and up to 21 for those leaving care) resources are limited, therefore, YCH targets those young people with greatest needs, in areas of deprivation, those who are most vulnerable, and those engaging or likely to engage in risky behaviours.

Youth Connexions operates in a variety of settings including Youth Connexions Centres, schools, colleges, community centres, youth projects, One Stop Shops, training provisions and detached locations such as parks and streets.

^[1] The Education and Inspections Act 2006, Part 1 Section 6: Education Act 1996, Section 205B

Appendix D

**Health and Community Services
North Herts Housing Needs Response
Housing Needs for Vulnerable People**

OLDER PEOPLE

Residential Care

Our aim is to increasingly use residential care beds to facilitate hospital discharges and allow people to return to their own home through intermediate care and enablement models. HCC predict that across ENHCCG, there will be a requirement for an extra 1200.3 residential beds, of which 40.4 additional residential care home rooms will be required in the North Herts district by 2025.

Nursing Care

There is a current shortage of capacity (particularly nursing dementia/older people with complex mental health issues) that is available for health and social care funded placements. HCS predict a significant gap in supply of nursing beds between 2016 and 2020, with supply for people with dementia/complex mental health issues experiencing the greatest shortage. The capacity issue partly relates to bed numbers, but also relates to affordability of beds that can be accessed.

Across the whole market in the ENHCCG area, there will be a requirement for an extra 622.3 nursing beds. HCC predict that in North Herts district across the whole market there will be a need for an additional 278.5 nursing beds by 2025. HCC predict that they will need to purchase an additional 44 beds of the total market capacity in North Herts for Health and Social care funded beds. HPFT will also require an extra 65 nursing beds by 2025 across Hertfordshire as they continue their transformation programme. Continuing health care teams in the CCG predict a rise in their demand for beds, but this has not yet been quantified.

Extra Care/Flexicare

The Housing Learning and Improvement Network's guidance for developing a housing strategy for accommodation with care for older people set an aspirational target of 25 units of extra care (flexicare) per 1,000 people aged over 75. Achieving this target in North Herts would require an increase of 29.5 flats by 2020, and 84.6 flats by 2025.

LEARNING DISABILITY

Accommodation for Independence

HCC have a target to convert up to 50% of residential care placements to supported living by the end of 2019/20. HCC have identified more than 40 residential schemes countywide that could be converted and are identifying where new supported living accommodation might be developed, such as new build general needs housing schemes.

Supported Living and Residential Accommodation

HCC lacks specialist services for complex needs and wants to increase community living accommodation provision, including bespoke property solutions e.g. individual, detached properties, for people with specific needs.

This accommodation should ideally be provided in clusters of six to eight 1 bedroom flats that meet the adaptable dwelling standard in Part M4(2) of the Building Regulations and the Lifetime Homes Standard. They would need to be in locations within walking distance of local amenities, such as shops, doctor's surgery and public transport. They would need to be let at affordable rents or possibly even offered on a shared ownership basis. These types of units are currently absent in most requirements for affordable homes within new developments.

Transition Services

In 2016-17 130 young people will move into adult social care countywide and HCC are looking to develop a comprehensive exit strategy for moving into adulthood to ensure suitable provision to provide young people with the care and accommodation they need.

Short Breaks

HCC are looking to commission a specialist short break unit for individuals with autism and challenging behaviour to meet this current gap in the market.

PHYSICAL DISABILITY/SENSORY IMPAIRMENT

Residential

The number of adults aged 18-64 with a moderate/serious physical disability is expected to increase by 10% to nearly 78,000 by 2025. Whilst still needed for some specific care needs, HCC want to move away from 'traditional' residential services and instead develop alternative housing options with various types of tenures to promote independence. This includes developing more integrated community services and supported living, and making better use of existing stock in the private rented sector by securing affordable and sustainable tenancies.

General Housing

HCC is reviewing all current housing stock with partners and district councils to design future projects including identifying/developing 1 or 2 bedroom specialist, wheelchair adapted properties. HCC also wants to work to make best use of existing housing stock and reduce the number of adaptations installed by matching service users' needs with the identification of available housing stock.

In 2016 130 young people are due to move into adult social care and HCC wants to stimulate the market to encourage more properties to be owner occupied.

Specialist Provision

HCC has a gap in specialist provision to meet specific needs, including longer term placements for people who have a neuro rehab need, and placements for individuals with alcohol induced Acquired Brain Injury (ABI)/Korsakoff syndrome.

MENTAL HEALTH

HPFT directly provide inpatient services for people with dementia who meet NHS Continuing Care eligibility and will be looking to the market to provide approximately 80 of these beds.

Residential Care

Dementia diagnoses are projected to increase 15% by 2020 and 34% by 2025, and mental health prevalence is set to increase at an estimated 6% over the next 10 years. HCC wants to reduce use of traditional residential care/ group home settings for people with mental health conditions, and increase alternative housing and support options, including working with the private rented sector to secure affordable and sustainable tenancies.

Recovery Services

HCC wants to stimulate the market to encourage more properties suitable for people with a mental health condition, focusing on the recovery model; this includes accommodation settings for rehabilitation, residential and supported living settings. These placements will not be a home for life but part of a pathway designed to equip individuals with skills they need to move on from these settings to independent living.

Move-on Accommodation

HPFT have recently reviewed people accessing mental health placements and found the following requirements countywide for move-on accommodation for individuals with a well-managed mental health diagnosis: 30 people who require supported living; 50 people currently in supported living who are ready for general needs/independent housing; 20 older adults who would benefit from sheltered accommodation. The particular demand across the county is for one bedroom flats/studios or self-contained provision.

Market position statements, their strategies and plans, these can be found at <http://www.hertfordshire.gov.uk/your-council/hcc/healthcomservices/hscic/suporcarehe1/>

Appendix 1m



HERTFORDSHIRE PROPERTY
Hertfordshire County Council
County Hall
Hertford SG13 8DE

Telephone 01992 588104
Minicom 01992 556611
E.Mail: Jacqueline.nixon
@hertfordshire.gov.uk

Contact:

My ref:

Your ref:

Date 17th October 2016

Dear Nigel

The emergent Local Plan and secondary education

Thank you for your email dated 16th September.

Officers at HCC are wholly aware of the importance of submitting robust evidence of service and infrastructure needs to support plan making and in a timely fashion. I hope you will agree that there is plenty of evidence that our two authorities have worked hard to build a relationship around that objective over the last few years, as has HCC with the rest of Hertfordshire. HCC's evidence has been submitted to a number of local plan consultations across the county, has been largely understood and agreed but where occasionally this has not been the case, has been placed in front of Inspectors at examination. And at examination Inspectors have always been supportive of the representations which we have made, the methodology employed and they have to date always agreed with our conclusions.

I am afraid it's not clear to me why you consider there is not need for a new secondary school at north east Stevenage(Great Ashby), when the approach to education provision taken in this case is no different to that used across the rest of the district (or even the county). And HCC has previously clearly stated on several occasions, the need for a minimum 6fe secondary school at this location. HCC has also previously proved that a site at Great Ashby was deliverable, having secured planning permission for a (BSF) scheme in 2010. As a result of HCC becoming aware that NHDC were taking a view not to identify a secondary school here Vincent and Gorbings (V&G) consultants were commissioned to undertake a site search to search for suitable locations for a school.



On 24th May 2016 HCC property officers met with NHDC planning officers at your offices on another matter. However, at that meeting HCC raised concern regarding the secondary school site issue. North Herts advised that the District Council were instead considering an alternative approach including two 4FE all through school sites as part of larger developments, one to be provided at Great Ashby with a second at Knebworth. The rationale for this approach was not explained and is not understood by HCC.

On 15 July 2016 the secondary school site search work was presented to officers from East Herts DC, North Herts DC, Stevenage BC and Welwyn Hatfield BC. HCC officers from Property (Development Services) and Children's Services (School Place Planning) were also in attendance. At that meeting V&G identified the preferred site for a new secondary school as being at NH6/NH7 (now referred to as GA2 in the emerging local plan) as this is best placed to serve the identified educational need at Great Ashby and the St Nicholas area of Stevenage. This was endorsed by Children's Services who explained that the identified need for secondary school places in Stevenage would not be met through the provision of two 4FE schools in Great Ashby and Knebworth. Notwithstanding the question of the sustainability of a secondary school in a village location, our analysis suggests new secondary provision in Knebworth would have minimal impact on the forecast demand arising from Stevenage, with demographic data supporting new provision to the north of Stevenage and Great Ashby.

At the meeting HCC stated that, as a result of the V&G site search, and confirmation from Children's Services of a need for an 8FE secondary school in the Great Ashby/St Nicholas area, they would need to consider making representations, to the North Herts Local Plan process regarding the proposed 4ha of education land included at site GA2. The representations might, seek the allocation of additional land adjacent to site GA2 to enable the expansion of the proposed education land to accommodate an 8FE secondary school to involve further allocation to create a site of 12-15ha in total if proved feasible.

Notwithstanding the above I'm aware that the Strategic Policies and Communities sections of the local plan include Policy SP18 which refers to the inclusion of up to 4ha of land for education purposes to include a minimum of 2FE primary-age provision at site GA2. Policy KB4 in the Communities section refers to the inclusion of up to 4ha of land for education purposes in Knebworth. It's not understood how these zones might be developed to offer sustainable or sufficient secondary school places.

After the July meeting, in early August, HCC asked NHDC for a further meeting and for more information regarding site GA2. Instead, NHDC asked the promoter of site GA2 (Keymer Cavendish Assocs) to get in touch with HCC and a meeting between the two parties was then held on 8 September. The parties agreed that as a result of them both undertaking separate highways assessments it was considered highly unlikely that site GA2 could offer provision of housing as well as both a primary and secondary school,



even if this was in the form of a smaller all-through school. As things stand therefore it appears that the Local Plan is unable to provide sufficient secondary provision to meet the needs of the local plan in this area.

Ideally the plan should identify a location for a school which has no prospect of having high alternative value, in order that it can be acquired at an affordable price. Identification of site GA2 for residential development in the Local Plan effectively means that the site becomes unaffordable to purchase for education purposes, if HCC were to seek to acquire knowing that it could be a deliverable school site. In any event, I wonder if NHDC are likely to support such an approach. HCC are therefore struggling to understand why NHDC has not concluded discussions and feasibility work in order to secure a sustainable secondary school site to serve north east Stevenage and the wider area.

As a result of the above, HCC must now consider next steps. It is inevitable that further work (involving commissioning specialist consultants) must be done to look for a suitable site north east of Stevenage, if one can be found, as well as considering what alternative approaches might exist. I imagine that you would be interested in learning the outcome of such additional reports as part of your preparation for local plan examination and HCC will therefore continue to inform you of the work which is undertaken, so that robust evidence can be maintained.

Yours sincerely,

Jacqueline Nixon
Head of Development Services
Property

Appendix 1n



Ruth Gray

From: Jacqueline Nixon <Jacqueline.Nixon@hertfordshire.gov.uk>
Sent: 17 October 2016 17:35
To: Nigel Smith
Cc: Andrea Gilmour; Dick Bowler; Kate Ma; Simon Ellis; Louise Symes; Ian Fullstone
Subject: RE: Secondary education need at north east Stevenage
Attachments: letter NHDC N Smith 171016.doc

Dear Nigel

Please see the attached letter. Whilst this might repeat some of the points already made, it summarises HCCs position more clearly than the emails exchanged to date as well as setting out steps to be now taken going forwards.

regards

Jacqueline Nixon

Head of Development Services
Property
Postal point CHO 313
Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN
Tel 01992 588104 **Comnet / Internal:** 28104

From: Nigel Smith [mailto:Nigel.Smith@north-herts.gov.uk]
Sent: 28 September 2016 09:33
To: Jacqueline Nixon
Cc: Andrea Gilmour; Dick Bowler; Kate Ma; Simon Ellis; Louise Symes; Ian Fullstone
Subject: RE: Secondary education need at north east Stevenage

Jacqueline,

Thanks for your email and for providing some feedback from your meeting with Keymer Cavendish.

As you will be aware, NHDC has requested on a number of occasions over recent years that HCC provide robust evidence to justify its position in terms of both calculations of future educational need and potential solutions to meet that need. We also consistently emphasised the need for that evidence to be provided in a timely fashion to coincide with the steps NHDC needed to take to produce a draft Local Plan.

Although HCC has continued to assert a requirement for additional, large-scale secondary education provision to the north-east of Stevenage, NHDC officers continue to hold the opinion that this position has not been supported by sufficient evidence such as to justify the inclusion of an educational allocation in this area / the Green Belt, particularly given the implications such an allocation might have had on other elements of our proposed plan.

Notwithstanding these concerns, NHDC's emerging local plan does include policy requirements that would be capable of meeting HCC's purported secondary education requirements, subject to robust and up-to-date assessments of need. It is noted that HCC have already informally expressed their dissatisfaction at both the location and format of education provision that would arise from this.

On Monday, our Cabinet met and approved the proposed submission local plan – including the strategy alluded to above - for public consultation. We anticipate that this consultation will commence on 19 October for six weeks. It is now for HCC to formally determine their position in relation to this plan and associated evidence base and submit whatever representations, evidence, modelling etc. considered necessary to support that position.

As per my previous email to Andrea, given the nature of the response we might expect to receive from HCC and the other parties with land and other interests in this area, I have significant reservations about meeting prior to the submission of any representations that HCC may now make - I don't want to be in a position where we (may be perceived to) either pre-judge our response to a consultation event that is yet to occur or ongoing and / or be 'coaching' HCC as to the nature of the representations or information we might expect to receive.

There is clearly a need for on-going discussion as the plan progresses towards submission (anticipated Spring 2017) and through any examination (Summer / Autumn 2017), including consideration of any modifications that may be deemed appropriate should an Inspector conclude that any plan, as submitted, would be 'unsound'. NHDC is fully committed to on-going discussions with the County Council to attempt to reach an agreed position. For now, I think it is best to let the existing processes that are already in train run their course and we can convene in the light of any representations that HCC formally submit to NHDC for consideration.

Notwithstanding all of the above, if you think there are issues we can address at this point in time without prejudice to either party please let us know and we will see what we can arrange.

Regards
Nigel

Nigel Smith
Principal Strategic Planning Officer

Direct Dial: 01462 474847
North Hertfordshire District Council
Council Offices, Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

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From: Jacqueline Nixon [<mailto:Jacqueline.Nixon@hertfordshire.gov.uk>]

→ **Sent:** 16 September 2016 13:04

To: Nigel Smith

Cc: Andrea Gilmour; Dick Bowler; Kate Ma; Simon Ellis; Louise Symes

Subject: Secondary education need at north east Stevenage

Importance: High

Dear Nigel

Further to correspondence between us (your email of 18th August to Andrea Gilmour and preceding exchanges) I write to advise of a recent meeting between HCC Property and Keymer Cavendish Ltd(KCL) to discuss the site now known as GA2 and the prospect of using additional land for education purposes. The meeting took place on 7th September at county hall.

Your email helpfully provided some information comprising concept plans and representations made by KCL. The following points made in the representations document are noted:-

- As regards the specific access arrangements, highways consultants have already confirmed that that there is sufficient capacity in the local highway network to accommodate 500 additional homes, plus a 1FE primary school.
- The viability will be assisted by increasing the site boundaries to facilitate the delivery of a 1FE school site with 555 homes or a 2FE school site with 695 homes, and this can be achieved with acceptable landscape implications.

Mr Keymer advised us, from his extensive knowledge and experience that he thought it would not be possible from a highway perspective to achieve additional education development at the site.

As you are aware, HCC has undertaken a site search for a secondary school , the findings of which were presented at a meeting on 15th July to your authority, plus Stevenage and East Herts. The report identified site GA2 as the preferred site for a secondary school. The site search work was supported by highways assessments undertaken by Pell Frischman consultants. They considered development comprising a 8FE school, a 1or 2 FE primary school and housing. They have indicated that the prospect of securing this amount of development from a highway perspective to be very difficult and uncertain for which significant additional analysis and modelling is required to prove whether or not it is possible. Given the above, it cannot be assumed that a secondary school can be delivered at this location and in my opinion it looks unlikely to be achievable.

It is my view that further discussions are required urgently with the local planning authority to determine how the need for 8 FE of secondary provision can be met, going forwards, in order that the Local Plan can adequately mitigate housing development .

I look forward to hearing from you.

Regards

Jacqueline Nixon

Head of Development Services

Property

Postal point CHO 313

Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN

Tel 01992 588104 **Comnet / Internal:** 28104

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Appendix 1o



Ruth Gray

From: Jacqueline Nixon <Jacqueline.Nixon@hertfordshire.gov.uk>
Sent: 17 October 2016 17:35
To: Nigel Smith
Cc: Andrea Gilmour; Dick Bowler; Kate Ma; Simon Ellis; Louise Symes; Ian Fullstone
Subject: RE: Secondary education need at north east Stevenage
Attachments: letter NHDC N Smith 171016.doc

Dear Nigel

Please see the attached letter. Whilst this might repeat some of the points already made, it summarises HCCs position more clearly than the emails exchanged to date as well as setting out steps to be now taken going forwards.

regards

Jacqueline Nixon

Head of Development Services
Property
Postal point CHO 313
Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN
Tel 01992 588104 **Comnet / Internal:** 28104

From: Nigel Smith [mailto:Nigel.Smith@north-herts.gov.uk]
Sent: 28 September 2016 09:33
To: Jacqueline Nixon
Cc: Andrea Gilmour; Dick Bowler; Kate Ma; Simon Ellis; Louise Symes; Ian Fullstone
Subject: RE: Secondary education need at north east Stevenage

Jacqueline,

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Notwithstanding these concerns, NHDC's emerging local plan does include policy requirements that would be capable of meeting HCC's purported secondary education requirements, subject to robust and up-to-date assessments of need. It is noted that HCC have already informally expressed their dissatisfaction at both the location and format of education provision that would arise from this.

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As per my previous email to Andrea, given the nature of the response we might expect to receive from HCC and the other parties with land and other interests in this area, I have significant reservations about meeting prior to the submission of any representations that HCC may now make - I don't want to be in a position where we (may be perceived to) either pre-judge our response to a consultation event that is yet to occur or ongoing and / or be 'coaching' HCC as to the nature of the representations or information we might expect to receive.

There is clearly a need for on-going discussion as the plan progresses towards submission (anticipated Spring 2017) and through any examination (Summer / Autumn 2017), including consideration of any modifications that may be deemed appropriate should an Inspector conclude that any plan, as submitted, would be 'unsound'. NHDC is fully committed to on-going discussions with the County Council to attempt to reach an agreed position. For now, I think it is best to let the existing processes that are already in train run their course and we can convene in the light of any representations that HCC formally submit to NHDC for consideration.

Notwithstanding all of the above, if you think there are issues we can address at this point in time without prejudice to either party please let us know and we will see what we can arrange.

Regards
Nigel

Nigel Smith
Principal Strategic Planning Officer

Direct Dial: 01462 474847
North Hertfordshire District Council
Council Offices, Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

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From: Jacqueline Nixon [<mailto:Jacqueline.Nixon@hertfordshire.gov.uk>]

→ **Sent:** 16 September 2016 13:04

To: Nigel Smith

Cc: Andrea Gilmour; Dick Bowler; Kate Ma; Simon Ellis; Louise Symes

Subject: Secondary education need at north east Stevenage

Importance: High

Dear Nigel

Further to correspondence between us (your email of 18th August to Andrea Gilmour and preceding exchanges) I write to advise of a recent meeting between HCC Property and Keymer Cavendish Ltd(KCL) to discuss the site now known as GA2 and the prospect of using additional land for education purposes. The meeting took place on 7th September at county hall.

Your email helpfully provided some information comprising concept plans and representations made by KCL. The following points made in the representations document are noted:-

- As regards the specific access arrangements, highways consultants have already confirmed that there is sufficient capacity in the local highway network to accommodate 500 additional homes, plus a 1FE primary school.
- The viability will be assisted by increasing the site boundaries to facilitate the delivery of a 1FE school site with 555 homes or a 2FE school site with 695 homes, and this can be achieved with acceptable landscape implications.

Mr Keymer advised us, from his extensive knowledge and experience that he thought it would not be possible from a highway perspective to achieve additional education development at the site.

As you are aware, HCC has undertaken a site search for a secondary school , the findings of which were presented at a meeting on 15th July to your authority, plus Stevenage and East Herts. The report identified site GA2 as the preferred site for a secondary school. The site search work was supported by highways assessments undertaken by Pell Frischman consultants. They considered development comprising a 8FE school, a 1or 2 FE primary school and housing. They have indicated that the prospect of securing this amount of development from a highway perspective to be very difficult and uncertain for which significant additional analysis and modelling is required to prove whether or not it is possible. Given the above, it cannot be assumed that a secondary school can be delivered at this location and in my opinion it looks unlikely to be achievable.

It is my view that further discussions are required urgently with the local planning authority to determine how the need for 8 FE of secondary provision can be met, going forwards, in order that the Local Plan can adequately mitigate housing development .

I look forward to hearing from you.

Regards

Jacqueline Nixon

Head of Development Services

Property

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Appendix 1p



Ruth Gray

From: Andrea Gilmour <Andrea.Gilmour@hertfordshire.gov.uk>
Sent: 19 October 2017 13:36
To: Ruth Gray
Subject: FW: Meeting regarding secondary school sites
Attachments: Concept plan.pdf; Concept plan2.pdf; Representations.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Ruth
Copy of email as requested.
Thanks
Andrea

Andrea Gilmour
Interim Head of Development Services
Property, Resources
Postal Point CHO313
Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN
Tel: 01992 556477 Comnet/Internal: 26477

→ **From:** Nigel Smith [mailto:Nigel.Smith@north-herts.gov.uk]
Sent: 18 August 2016 14:55
To: Andrea Gilmour
Subject: RE: Meeting regarding secondary school sites

Hi Andrea,

Further to previous email and your request for information on GA2, I've attached the representations and concept plans we received from the landowner relating to this site in response to the Preferred Options consultation. Their contact details are on the front cover if you need to contact them directly.

Our supporting evidence base for the local plan can be accessed through the link below. This includes, among other things, assessments relating to housing, Green Belt, landscape etc. <http://www.north-herts.gov.uk/home/planning/planning-policy/emerging-local-plan/proposed-submission-local-plan-2011-2031>

Thanks
Nigel

Nigel Smith
Principal Strategic Planning Officer

Direct Dial: 01462 474847
North Hertfordshire District Council
Council Offices, Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

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From: Andrea Gilmour [mailto:Andrea.Gilmour@hertfordshire.gov.uk]
Sent: 05 August 2016 09:55
To: Nigel Smith

Cc: Kate Ma; Alice Carrington; Jacqueline Nixon; Samantha Young2 (Schools Planning); David Hill; Louise Symes
Subject: RE: Meeting regarding secondary school sites

Hi Nigel

Thank you for your message. I understand your position regarding a meeting prior to the publication of the North Herts Local Plan.

I agree that it would be useful to meet after the consultation has closed later this year.

However, I thought it would be useful to set out HCCs position following the conclusion of the recent secondary school site search work.

HCC Property Officers met with NHDC planning officers on 24 May 2016 at NHDC offices. At that meeting North Herts officers mentioned that the District Council were considering including two 4FE all through school sites within the local plan, one to be provided at Great Ashby with a second at Knebworth. This meeting was held prior to the conclusion of the secondary school site search in July 2016.

On 15 July 2016 the secondary school site search work was presented to officers from East Herts DC, North Herts DC, Stevenage BC and Welwyn Hatfield BC by Vincent and Goring (V&G) at their offices in Stevenage. HCC officers from Property (Development Services) and Children's Services (School Place Planning) were also in attendance.

At that meeting V&G identified the preferred site for a new secondary school as being at NH6/NH7 (now referred to as GA2 in the emerging local plan) as this is best placed to serve the identified educational need at Great Ashby and the St Nicholas area of Stevenage. This was supported at the meeting by Children's Services who explained that the identified need for secondary school places in Stevenage would not be met through the provision of two 4FE schools in Great Ashby and Knebworth. Notwithstanding the question of the sustainability of a secondary school in a village location, our analysis suggests new secondary provision in Knebworth would have minimal impact on the forecast demand arising from Stevenage, with demographic data supporting new provision to the north of Stevenage and Great Ashby.

At the meeting HCC (Development Services) stated that, as a result of the V&G site search, and confirmation from Children's Services of a need for an 8FE secondary school in the Great Ashby/St Nicholas area, they would need to consider making representations at appropriate points, to the North Herts Local Plan process regarding the proposed 4ha of education land included at site GA2. The representations would most likely be seeking the allocation of additional land adjacent to site GA2 to enable the expansion of the proposed education land to accommodate an 8FE secondary school. This is likely to involve further allocation to create a site of 12-15ha in total.

In order to commence this work it would be helpful if could you provide HCC with any information you hold on site GA2.

Thank you.

Andrea

Andrea Gilmour
Principal Planning Officer, Development Services
Property, Resources
Postal Point CHO313
Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN
Tel: 01992 556477 Comnet/Internal: 26477

From: Nigel Smith [<mailto:Nigel.Smith@north-herts.gov.uk>]
Sent: 28 July 2016 09:54
To: Andrea Gilmour

Cc: Kate Ma; Alice Carrington; Jacqueline Nixon; Samantha Young2 (Schools Planning); David Hill; Louise Symes
Subject: Re: Meeting regarding secondary school sites

Hi Andrea,

Thanks for your call (apologies for not being able to get back to you on Monday) and message.

Before proceeding, could I ask what issues you foresee a meeting covering at this point in time?

As you will be aware, the strategic policies and site allocations of North Herts' draft local plan were endorsed last week at Full Council. We are now under instruction to finalise the draft Local Plan for formal approval by Cabinet in September ahead of a 6-week pre-submission consultation, probably commencing in October. At this point we would expect HCC and any other interested parties to make their formal representations to the draft plan.

Following Council, our scope to make changes to the endorsed strategy is limited to finalisation of detailed wording etc. At the meeting at V&G on 15 July, HCC made clear that they are likely to be pursuing a more substantive alteration to the proposed draft plan, viz a larger secondary school beyond the existing development at Great Ashby. This goes beyond the scope of changes we can make at this time and HCC will need to formally pursue this, or any other, position through the consultation.

In this context, and given there will be other parties with an interest in this matter, I don't want to be in a position where we (may be perceived to) either pre-judge our response to a consultation event that is yet to occur and / or be 'coaching' HCC as to the nature of the representations we might expect to receive against our own draft plan.

There is clearly a need for on-going discussion as the plan progresses towards submission (anticipated Spring 2017) and through examination (Summer / Autumn 2017), including consideration of any modifications that may be deemed appropriate. For now, I think it is best to let the existing processes that are already in train run their course and we can reconvene in the light of any representations that HCC formally submit to NHDC for consideration.

Notwithstanding all of the above, if you think there are issues we can address at this point in time without prejudice to either party – including any 'non-Great Ashby' issues - please let us know and we will see what we can arrange.

Thanks
Nigel

Nigel Smith
Principal Strategic Planning Officer

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Council Offices, Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

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From: Andrea Gilmour [<mailto:Andrea.Gilmour@hertfordshire.gov.uk>]

Sent: 26 July 2016 15:30

To: Nigel Smith

Cc: Kate Ma; Alice Carrington; Jacqueline Nixon; Samantha Young2 (Schools Planning); David Hill

Subject: Meeting regarding secondary school sites

Hi Nigel

Following the recent meeting regarding the secondary school site search and the approval at North Herts Full Council meeting of the Communities and Strategic Policies of the emerging local plan for consultation, I would like to set up a meeting at your offices to discuss secondary education.

Please could you advise on your availability over the next two to three weeks?

Thank you.

Andrea

Andrea Gilmour
Principal Planning Officer, Development Services
Property, Resources
Postal Point CHO313
Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN
Tel: 01992 556477 **Comnet/Internal: 26477**

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Appendix 1q

From: Andrea Gilmour
To: ["Nigel Smith"](#)
Cc: [Kate Ma](#); [Alice Carrington](#); [Jacqueline Nixon](#); [Samantha Young2 \(Schools Planning\)](#); ["David Hill"](#); ["Louise Symes"](#)
Subject: RE: Meeting regarding secondary school sites

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In order to commence this work it would be helpful if could you provide HCC with any information you hold on site GA2.

Thank you.

Andrea

Andrea Gilmour
Principal Planning Officer, Development Services
Property, Resources
Postal Point CHO313
Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN
Tel: 01992 556477 **Comnet/Internal:** 26477

From: Nigel Smith [mailto:Nigel.Smith@north-herts.gov.uk]
Sent: 28 July 2016 09:54
To: Andrea Gilmour
Cc: Kate Ma; Alice Carrington; Jacqueline Nixon; Samantha Young2 (Schools Planning); David Hill; Louise Symes
Subject: Re: Meeting regarding secondary school sites

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Notwithstanding all of the above, if you think there are issues we can address at this point in time without prejudice to either party – including any 'non-Great Ashby' issues -

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Thanks
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Nigel Smith
Principal Strategic Planning Officer

Direct Dial: 01462 474847
North Hertfordshire District Council
Council Offices, Gernon Road
Letchworth Garden City
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Sent: 26 July 2016 15:30
To: Nigel Smith
Cc: Kate Ma; Alice Carrington; Jacqueline Nixon; Samantha Young2 (Schools Planning); David Hill
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Appendix 1r



Andrea

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Principal Planning Officer, Development Services
Property, Resources
Postal Point CHO313
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Appendix 1s



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Nigel Smith
Principal Strategic Planning Officer

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Appendix 1t



Ruth Gray

From: Nigel Smith <Nigel.Smith@north-herts.gov.uk>
Sent: 18 August 2016 14:55
To: Andrea Gilmour
Subject: RE: Meeting regarding secondary school sites
Attachments: Concept plan.pdf; Concept plan2.pdf; Representations.pdf

Hi Andrea,

Further to previous email and your request for information on GA2, I've attached the representations and concept plans we received from the landowner relating to this site in response to the Preferred Options consultation. Their contact details are on the front cover if you need to contact them directly.

Our supporting evidence base for the local plan can be accessed through the link below. This includes, among other things, assessments relating to housing, Green Belt, landscape etc. <http://www.north-herts.gov.uk/home/planning/planning-policy/emerging-local-plan/proposed-submission-local-plan-2011-2031>

Thanks
Nigel

Nigel Smith
Principal Strategic Planning Officer

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From: Andrea Gilmour [mailto:Andrea.Gilmour@hertfordshire.gov.uk]
Sent: 05 August 2016 09:55
To: Nigel Smith
Cc: Kate Ma; Alice Carrington; Jacqueline Nixon; Samantha Young2 (Schools Planning); David Hill; Louise Symes
Subject: RE: Meeting regarding secondary school sites

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From: Nigel Smith [mailto:Nigel.Smith@north-herts.gov.uk]

Sent: 28 July 2016 09:54

To: Andrea Gilmour

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Appendix 1u



RESPONSE TO LOCAL PLAN SITE TESTING MAY 2016

NORTH HERTFORDSHIRE DISTRICT COUNCIL

June 2016

Andrea Gilmour
Principal Planning Officer
Development Services
Property
Hertfordshire County Council

Introduction

This paper has been prepared by Hertfordshire County Council (HCC) Development Services team in the response to the information provided by North Herts District Council (NHDC) regarding housing sites to be included in their emerging local plan. The information provided relates to the impact of the proposed housing allocations on school places.

The site information provided by NHDC has been checked against the information contained in the current HCC Children's Services (CS) school place forecast with regard to developments with planning permission. Small differences were found for Baldock, Codicote and Hitchin. An adjustment number has been included for those settlements and this is shown on the relevant settlement table.

Settlement Information

This response is set out in alphabetical order by settlement.

Ashwell

| Ref | Site | Dwellings |
|----------------------------------|----------------------------|-----------|
| AS1 | Land west of Claybush Road | 33 |
| Total dwellings 2011-2031 | | 33 |

Education requirement

Total dwellings 2011 to 2031

0.6FE

Funding will be sought to ensure the local education infrastructure can accommodate the additional demand arising from Site AS1.

Baldock

| Ref | Site | Dwellings |
|---|---|-------------|
| Units with planning permission not currently in CS forecast | | 12 |
| BA1 | Land north of Baldock | 2800 |
| BA2 | Land off Clothall Road, Baldock (Clothall parish) | 200 |
| BA3 | South of Clothall Common, Baldock (Clothall parish) | 200 |
| BA4 | East of Clothall Common | 95 |
| BA5 | Land off Yeomanry Drive | 25 |
| BA6 | Land at Icknield Way | 26 |
| BA7 | Rear of Clare Crescent | 20 |
| BA8/BA9 | Works, Station Road/ Adjoining Raban Court | 50 |
| New Site | Deans Yard, South Road | 20 |
| Total dwellings 2011-2031 (incl. New Sites) | | 3448 |

Education requirement

Total dwellings 2011 to 2031

7FE

Breakdown

Site BA1 (2800 dwellings)

5.6FE

Sites BA2 to BA9 including new site and units not in forecast (648 dwellings)

1.3FE

In considering the total scale of development proposed in Baldock the education infrastructure requirement would include:

- A pattern of new primary school sites to accommodate up to 8FE of primary provision, suitably located within the development to serve the new communities north and south of the railway.
- 1 x 7FE secondary school site to the north of the railway, which could include all through education provision.

The exact configuration of the above education infrastructure is still to be finalised and will need to be included in any masterplan. Some expansion of Knights Templar School is possible and could be considered in this exercise. This means that the proposals for schools shown on the illustrative masterplan drawings already submitted as representations are indicative only.

Barkway

| Ref | Site | Dwellings |
|----------------------------------|--|------------------|
| BK1 | Land east of Cambridge Road | 13 |
| BK2 | Land North of Windmill Close | 20 |
| New site | Land between Cambridge Road & Royston Road | 140 |
| Total dwellings 2011-2031 | | 173 |

Education requirement

Total dwellings 2011 to 2031

0.35FE

A total of 173 dwellings are proposed for Barkway providing a pupil yield on 0.35FE. The existing school site is quite constrained and is considered difficult to expand. It would be prudent that the reserve site allocation in the current Local Plan is carried forward into the new Local Plan.

Codicote

| Ref | Site | Dwellings |
|---|----------------------------|------------------|
| Units with planning permission not currently in CS forecast | | 28 |
| CD1 | Land south of Cowards Lane | 73 |
| CD2 | Codicote Garden Centre | 54 |
| CD3 | Land NE of The Close | 48 |
| New Site | Land south of Heath Road | 140 |
| Total dwellings 2011-2031 | | 343 |

Education requirement

Total dwellings 2011 to 2031

0.7FE

The existing 1FE Codicote school site is constrained and current forecasts indicate a shortage of places from the existing community without any additional housing development. Expansion of the existing primary school is required; however there appear to be highway/site constraint issues.

It is requested that land adjoining the site, which is not in HCC ownership, be allocated to facilitate the expansion and potentially provide a new access to the school. Without this the school cannot support any new housing in the village.

HCC would expect the developer of the Land south of Heath Road to provide the necessary additional school land/access as part of their scheme – a master planning approach would appear appropriate.

Graveley

| Ref | Site | Dwellings |
|----------------------------------|------------------------------|------------|
| NS1 | North of Stevenage | 900 |
| GR1 | Land at Milksey Lane (north) | 8 |
| Total dwellings 2011-2031 | | 908 |

Education requirement

Total dwellings 2011 to 2031

1.8FE

NS1 (Stevenage North) should be delivered jointly through a masterplan to be prepared with Stevenage Borough Council, which controls the adjoining land to the south.

The proposed 908 dwellings equates to 1.8FE. On this basis HCC would seek a 2FE primary school within the NHDC land to the north of Stevenage, with any development adjacent to this within Stevenage having its own primary provision.

The pupil yield from the remaining 8 new dwellings which are located within the village of Graveley itself could be accommodated within the existing primary school.

Great Ashby/Weston

| Ref | Site | Dwellings |
|----------------------------------|---------------------------------|------------|
| GA1 | Roundwood, North East Stevenage | 330 |
| GA2 | Land off Mendip Way | 600 |
| Total dwellings 2011-2031 | | 930 |

Education requirement

Total dwellings 2011 to 2031

1.9FE

HCC would be seeking a new 2fe primary school in this area to serve the yield arising from the new developments.

NOTE - Site GA1 has already come forward as a planning application and contributions have been sought from this development towards the expansion of The Leys Primary School as this is the closest school currently to the development with expansion potential. However, even with this development coming forward in advance, HCC would still seek a new 2FE primary school site as a result of the remaining housing sites and other sites coming forward in the northern Stevenage area.

New secondary school at Great Ashby – site of secondary school granted planning permission April 2010 (site GA2) should be designated as an education zone/allocation

within the Local Plan to provide flexibility and ensure sufficient land is available to meet educational need.

Hitchin

| Ref | Site | Dwellings |
|---|--|-------------|
| Units with planning permission not currently in CS forecast | | 35 |
| HT1 | Highover Farm, Stofold Road | 700 |
| HT2 | Land north of Pound Farm, London Road (St Ippolyts parish) | 84 |
| HT3 | Land south of Oughtonhead Lane | 46 |
| HT4 | Land at Lucas Lane | 27 |
| HT5 | Land at junction of Grays Lane &, Lucas Lane | 16 |
| HT6 | Land at junction of Grays Lane and, Crow Furlong | 53 |
| HT8 | Cooks Way | 50 |
| HT9 | Centre for the Arts, Willian Road | 85 |
| New Site | Priory Field | 300 |
| New Site | Former B&Q | 60 |
| Total dwellings 2011-2031 | | 1456 |

Education requirement

Total dwellings 2011 to 2031

2.9FE

There is very limited capacity in existing schools across the town for expansion, therefore prudent planning indicates the need for a new 2fe primary school site to ensure sufficient provision to meet demand across Hitchin. In terms of where larger strategic sites are being proposed, the provision of a new 2fe primary school would be well met to the east of the town where significant new housing is proposed (around Highover Farm).

Bearton Green is a reserve school site in the current Local Plan. From September 2016 Bearton Green will be used as a detached playing field by William Ransom Primary which is being permanently expanded to 2fe. It would therefore be prudent that the reserve site allocation is carried forward into the new Local Plan as it would provide flexibility in that if needed, the land could be used to facilitate expansion of other existing schools by providing detached playing fields.

Some expansion of the existing secondary schools is considered feasible although capacity is limited and we would therefore seek appropriate planning policies, as indicated previously, to support the physical expansion of school sites to accommodate local demand. In this respect, removal of the Priory School from the Green Belt would be welcomed.

HCC has current proposals to expand secondary capacity across Hitchin to meet existing demand. It is worth noting that the development at Highover Farm is closer to Letchworth Garden City for secondary provision, so pupil yield from this development may look to Letchworth Garden City for secondary education.

Ickleford

| Ref | Site | Dwellings |
|----------------------------------|------------------------------|------------|
| IC1 | Land off, Duncots Close | 9 |
| IC2 | Burford Garage, Bedford road | 40 |
| New Site | Arnolds Farm, Chambers Lane | 12 |
| New Site | Land at Ramerick | 120 |
| New Site | Land at Bedford Road | 150 |
| Total dwellings 2011-2031 | | 331 |

Education requirement

Total dwellings 2011 to 2031

0.7FE

The proposed new sites would generate a requirement of 0.7FE. Ickleford primary school is a 1FE school on a confined site. A site for a 2FE Primary School would be required and the relocation of the existing school.

The new site on land at Ramerick directly adjoins the Central Bedfordshire Council boundary. Therefore the nearest schools to this development would be in Lower Stondon, as Ickleford is approximately 2 miles to the south. Central Bedfordshire Council advises that there may be some expansion potential at either Derwent Lower or Stondon Lower School, so perhaps we would seek S106 contributions to be used in Central Bedfordshire from this particular development.

The remaining sites proposed in Ickleford total approximately 211 dwellings, around 0.4fe, which is not ideal in terms of expansion of the existing school.

Kimpton

| Ref | Site | Dwellings |
|----------------------------------|---------------------------|-----------|
| KM3 | Land North of High Street | 13 |
| Total dwellings 2011-2031 | | 13 |

Education requirement

Total dwellings 2011 to 2031

0.03FE

Funding will be sought to ensure the local education infrastructure can accommodate the additional demand arising from Site KM3.

Kings Walden

| Ref | Site | Dwellings |
|----------------------------------|--|-----------|
| KW1 | Allotments west of The Heath, Breachwood Green | 16 |
| New Site | Allotments south of Colemans Green | 20 |
| Total dwellings 2011-2031 | | 36 |

Education requirement

Total dwellings 2011 to 2031

0.07FE

Funding will be sought to ensure the local education infrastructure can accommodate the additional demand arising from the proposed sites in Kings Walden.

Knebworth

| Ref | Site | Dwellings |
|--|------------------------|------------|
| KB1 | Land at Deards End | 240 |
| KB2 | Land at Gypsy Lane | 184 |
| New Site | Chas Lowe, London Road | 14 |
| New Site | Land east of Knebworth | 200 |
| Total dwellings 2011-2031 (incl. New Sites) | | 638 |

Education requirement

Total dwellings 2011 to 2031

1.3FE

The existing primary school in Knebworth is full and has no expansion capacity. There is a requirement for a new 2FE primary school site on the west of the town. It would be preferable if the large sites could be phased to come forward together to support the delivery of additional primary places.

The closest secondary schools to Knebworth are in south Stevenage. Long term proposed housing development and population growth suggests insufficient capacity within the existing secondary schools in Stevenage to accommodate future forecast demand. Therefore, as indicated above, it would be prudent to reserve a secondary school site at Great Ashby and NE Stevenage to plan for future population pressures.

Letchworth

| Ref | Site | Dwellings |
|----------------------------------|---|-------------|
| LG1 | Letchworth North | 900 |
| LG3 | Land east of Kristiansand Way | 120 |
| LG4 | Land north of former Norton School, Norton Road | 68 |
| LG5 | Land at Birds Hill | 86 |
| LG6 | Land off Radburn Way | 35 |
| LG8 | Pixmore Industrial estate | 80 |
| LG9 | Former Lannock School | 45 |
| LG10 | Former playing field, Croft Lane | 37 |
| LG11 | Garden Square Shopping Centre | 45 |
| New Site | Glebe Road industrial estate | 10 |
| New Site | Nursery, Icknield Way | 8 |
| New Site | Garages, Icknield Way | 25 |
| New Site | Foundation House | 47 |
| New Site | Hamonite | 30 |
| New Site | Former Depot, Icknield Way | 55 |
| Total dwellings 2011-2031 | | 1591 |

Education requirement

Total dwellings 2011 to 2031

3.2FE

Site LG1 (900 dwellings) 1.8FE - Additional school places would be required. To be provided through provision of a new 2FE primary school site as part of a masterplan for this area.

Sites LG2 - LG11 and new sites (691 dwellings) 1.4FE - Additional school places would be required. To be provided through expansion of existing schools (financial contributions required), however, it would be prudent if the reserve school site allocation at Southern Way, which is on the proposals map of the current local plan, is carried forward into the new local plan and excluded from the Green Belt.

Feasibility work is required to establish if the existing secondary schools have sufficient expansion potential to meet the demand from the scale of development, particularly in light of the additional development at Highover Farm, Hitchin for 700 dwellings. The nearest secondary schools to this site would be in Letchworth.

East of Luton

| Ref | Site | Dwellings |
|----------------------------------|--------------------------|-------------|
| EL1 | East of Luton (west) | 1050 |
| EL2 | East of Luton (east) | 350 |
| EL3 | Land north east of Luton | 700 |
| Total dwellings 2011-2031 | | 2100 |

Education requirement

Total dwellings 2011 to 2031

4.2FE

The nearest Hertfordshire secondary schools to this proposed development are in Hitchin, approximately 6 miles from the site. This site falls mainly within the Hitchin priority area for admissions purposes. The secondary schools in Hitchin are all full at year of admission and current forecasts indicate a need for additional places to meet rising demand from the existing community.

There are closer secondary schools in Luton. However, Luton Borough Council is also experiencing increased demand for secondary provision across their area and there is therefore no existing surplus capacity available in Luton schools to accommodate the yield from this development.

In light of this, the County Council requests this development is master-planned with the Crown Estates land to bring forward a sustainable development capable of delivering new primary and secondary schooling for those new local communities.

It would be prudent to seek 4FE of new primary school provision and a new secondary school site within the heart of the new larger development to serve the needs of the development as a whole. The secondary school could be sized to accommodate Hertfordshire pupils, for whom it would be their nearest school, thereby reducing pressure in Hitchin.

Pirton

| Ref | Site | Dwellings |
|----------------------------------|--------------------------|------------|
| PT1 | Land east of Priors Hill | 58 |
| PT2 | Holwell Turn, West Lane | 70 |
| Total dwellings 2011-2031 | | 128 |

Education requirement

Total dwellings 2011 to 2031

0.3FE

Funding will be sought to ensure the local education infrastructure can accommodate the additional demand arising from Sites PT1 and PT2

Reed

| Ref | Site | Dwellings |
|----------------------------------|--------------------------|-----------|
| RD1 | Land at Blacksmiths Lane | 22 |
| Total dwellings 2011-2031 | | 22 |

Education requirement

Total dwellings 2011 to 2031

0.04FE

Funding will be sought to ensure the local education infrastructure can accommodate the additional demand arising from Site RD1.

Royston

| Ref | Site | Dwellings |
|----------------------------------|--------------------------------------|-------------|
| RY1 | Land west of Ivy Farm, Baldock Road | 279 |
| RY2 | Land north of Newmarket Road (north) | 330 |
| RY4 | Land north of Lindsay Close | 40 |
| RY5 | Agricultural supplier, Garden Walk | 25 |
| RY7 | Anglian Business Park | 48 |
| RY8 | Land at Lumen Road | 14 |
| New Site | Land south of Newmarket Road | 300 |
| Total dwellings 2011-2031 | | 1036 |

Education requirement

Total dwellings 2011 to 2031

2.07FE

The primary population in Royston is increasing and, to ensure sufficient local places, HCC has provided an additional 1FE of permanent capacity within the First Schools in the town. All First schools are currently full and feasibility work suggests that there is no further expansion capacity available. It would therefore be prudent to allocate a new 2FE First School site to ensure the future population and yield arising from the new housing can access a local school place.

St Ippolyts

| Ref | Site | Dwellings |
|----------------------------------|------------------------------|-----------|
| SI1 | Land south of Waterdell Lane | 40 |
| SI2 | Land south of Stevenage Road | 12 |
| Total dwellings 2011-2031 | | 62 |

Education requirement

Total dwellings 2011 to 2031

0.1FE

Current analysis indicates that there are sufficient places to meet the local population, however an increase of dwellings in the village may impact upon this and the additional yield may be difficult to accommodate at this school. St Ippolyts C of E (Aided) Primary has a PAN of 20. It is likely that additional classrooms would be required to expand the school to 1FE, although it should be noted that feasibility advice indicates this would be difficult to achieve on the current site.

St Paul's Walden

| Ref | Site | Dwellings |
|----------------------------------|---|-----------|
| SP1 | Land south of High Street, Whitwell | 40 |
| New Site | Land between Horn Hill and Bendish Lane, Whitwell | 41 |
| Total dwellings 2011-2031 | | 81 |

Education requirement

Total dwellings 2011 to 2031

0.16FE

Current analysis indicates that there are sufficient places to meet the local population; however this may be impacted upon by an increase of dwellings in the village. Feasibility advice indicates that the existing St Paul's Walden Primary (PAN 17) site is confined but could expand up to 1FE at most. It could therefore expand to accommodate pupils from this development. Funding will be sought to ensure the local education infrastructure can accommodate the additional demand arising from the proposed sites.

Therfield

| Ref | Site | Dwellings |
|----------------------------------|-----------------------------|-----------|
| TH1 | Land west of Police Row | 12 |
| TH2 | Land south of Kelshall Road | 12 |
| Total dwellings 2011-2031 | | 24 |

Education requirement

Total dwellings 2011 to 2031

0.05FE

Funding will be sought to ensure the local education infrastructure can accommodate the additional demand arising from Sites TH1 and TH2.

Weston

| Ref | Site | Dwellings |
|----------------------------------|-----------------------|------------------|
| WE1 | Land off Hitchin Road | 40 |
| Total dwellings 2011-2031 | | 40 |

Education requirement

Total dwellings 2011 to 2031

0.08FE

Current analysis indicates that there are sufficient places to meet the demand from the local population; however an increase of dwellings in the village may impact upon this. Feasibility advice indicates that some expansion potential is available at the school. Therefore funding will be sought to ensure the local education infrastructure can accommodate the additional demand arising from site WE1.

Wymondley

| Ref | Site | Dwellings |
|----------------------------------|--------------------------------|------------------|
| WY1 | Land south of Little Wymondley | 300 |
| Total dwellings 2011-2031 | | 300 |

Education requirement

Total dwellings 2011 to 2031

0.6FE

The existing village school is 0.5FE and has expansion potential to 1FE on its existing site; however expansion beyond this would require additional land or provision of a detached playing field.

Wymondley pupils in the main look to Hitchin for their secondary schooling. With rising demand for secondary places in Hitchin, although some expansion of the existing secondary schools is considered feasible, capacity is limited and we would therefore seek appropriate planning policies, as previously indicated, to support the physical expansion of school sites to accommodate local demand.

Appendix One – Educational Context

1.0 Introduction

- 1.1 To assist with interpreting the information provided, the background to the current situation regarding school places within the District, together with a definition of the terms used throughout this document, is given below.

Role of the County Council

- 1.2 Hertfordshire County Council (HCC) is the local education authority and is subject to a number of statutory duties and responsibilities including:
- Promoting high standards of education
 - Planning and commissioning school places in its local authority area
 - Extending diversity and choice
 - Co-ordinating admissions for all maintained schools
 - Co-ordinating admissions for Academies and Free Schools – where requested to do so
 - Resourcing the shared maintenance, improvement to, and provision of, the built school environment, and securing value for money.
- 1.3 In coming to a view about the most appropriate strategy in response to development growth proposals, HCC is looking for a solution which takes into account each of these elements.

School Planning Context

- 1.4 HCC has a duty to secure sufficient school places in its area, ensuring that every child has access to a school place. HCC fulfils these planning responsibilities by forecasting the demand for school places in order to identify an appropriate balance between supply and demand. It negotiates the right number of places on an annual basis, whilst in parallel undertaking longer term strategic planning.

Rising Demand

- 1.5 Hertfordshire has experienced a significant rise in the demand for primary places across the County in recent years in line with the picture nationally. The rise is not consistent across the county, with some areas experiencing substantial increases in the primary aged population, whilst in some more rural areas demand is less pressing or currently remains fairly static. More information on the rising demand is available through HCC's strategy document '*Meeting the Rising Demand for School Places*', available at the link given below
<http://www.hertsdirect.org/services/edlearn/aboutstatesch/planning/>

Forecasts

- 1.6 HCC produces pupil forecasts every six months for both Reception and Year 7 demand. At a primary level, HCC forecast 5 years ahead and secondary forecasts stretch to 10 years in the future.
- 1.7 These forecasts are based on actual date of 0-5 year olds in an area, historic pupil movement as well as an assumed pupil yield from new housing developments. The forecasts have taken account of an assumed housing growth trajectory for the longer term, as provided by Hertfordshire's District and Borough Councils.
- 1.8 Latest forecasts are provided within the body of this response. These project demand for admissions into Reception and Year 7 and do not include any margin.

HCC would normally plan a surplus of 5 to 10% across an area to allow for fluctuations in forecast demand.

Further information on the methodology around the pupil forecasts can be found at <http://www.hertsdirect.org/services/edlearn/aboutstatesch/planning/>.

New Schools

- 1.9 The way in which new schools are set up has undergone significant change in recent years. The County Council's role as a commissioner of places is such that where it considered there is a basic need for a new school it must:
- Seek proposals to establish an academy/free school; or (if unsuccessful)
 - Hold a statutory competition; or (if unsuccessful)
 - Publish its own proposals for a new maintained school
- 1.10 The County Council remains responsible for providing the site and meeting all associated capital and pre/post-opening costs, in instances where the new school provision is meeting basic need. Therefore, the County Council continues to hold the key role in negotiating S106 contributions for, and the provision of, all school infrastructure.

Principles

Forms of Entry

- 1.11 School provision is often described in terms of 'forms of entry'. 1 form of entry (FE) equals 30 places per year group.
- 1.12 Primary schools have seven year groups from Reception through to Year 6. HCC has a preference for primary schools of 2FE or more, as this larger size provides improved opportunities for delivery of a broad education curriculum and staff development, as well as offering the ability to better manage fluctuations in demand. A 2FE primary school will have 7 year groups of 60 pupils (420 in total), plus a Nursery class where offered.
- 1.13 Secondary schools have five year groups, from Year 7 through to Year 11, and Sixth Forms with lower and upper year groups. HCC has a preference for secondary schools of 6 to 10FE as this offers improved opportunities for the delivery of a broad education curriculum. A 6FE school will have 5 year groups of 180 pupils (1080 in total) plus a Sixth Form.

Pupil Yield

- 1.14 When undertaking high level school place planning related to new residential development, HCC determines child yield based on a ratio of 1FE per 500 dwellings to be 97.5% confident of not underestimating yield.
- 1.15 This is based on a study of 49 Hertfordshire developments undertaken by HCC's demographer (c. 2008). This work produced a yield range of 1FE per 500 dwellings (42 children per 100 dwellings / 97.5% confidence) to 1FE per 850 dwellings (24.7 children per 100 dwellings/50% confidence).
- 1.16 The County Council applies the upper end of the range, 1FE.per 500 dwellings, in the first instance to ensure prudent planning.

- 1.17 When considering actual proposals or planning applications, the County Council uses specific development forecasting models to ascertain more tailored demographic profiles, including pupil yields.

Developer Contributions

- 1.18 The co-ordination of new infrastructure provision to ensure that all development contributes appropriately to infrastructure requirements is an approach supported by HCC. We welcome an opportunity to continue with our joint working to determine the most effective trajectory for development. This will ensure that our services are able to deliver supporting infrastructure in a timely and efficient manner.
- 1.19 HCC is currently reviewing its Planning Obligations Toolkit to support the funding of infrastructure provision through S106 but we would seek to encourage the implementation of a CIL at the earliest opportunity. The cumulative impact of smaller sites can create additional demands and burdens on existing infrastructure which must be addressed through developer contributions. Since April 2015, the ability to pool S106 planning obligations is restricted and it is increasingly difficult to fund projects which mitigate the impact of smaller developments. The implementation of a CIL is currently the most viable option of supporting the development of these sites and the provision of infrastructure, particularly strategic infrastructure such as secondary schools.
- 1.20 HCC encourage the development of masterplans for strategic sites. This assists in delivering a transparent process whereby each stakeholder is aware of their roles and responsibilities. This is particularly important where there are cross boundary issues associated with sites bordering neighbouring authorities, for example. It may also be necessary to consider how infrastructure contributions might be passed across administrative boundaries for cross boundary sites. For example, development directly adjacent to a settlement outside of your local authority administrative area might reasonably be expected to make contributions towards service provision at a neighbouring authority.

Site Size

- 1.21 School site standards have recently changed (School Premises Regulations, 2012) and provide a much less stringent approach to school site standards. The County Council is now using the site areas that refer to Building Bulletin 103 area guidelines for mainstream schools.

Detached Playing Fields

- 1.22 A school should have all of the facilities it requires, including playing fields, provided on a single site.
- 1.23 There may, however, be situations where in order to provide additional school place capacity at an existing site a detached playing field may be required. For a primary school, this facility should ideally be located within 400 metres of the main school site and be appropriate to enable delivery of the PE curriculum.

Green Belt Boundaries

- 1.24 HCC seek a flexible approach to Green Belt boundaries which continue to fall within school sites. The inclusion of school sites within the Green Belt can lead to potential difficulties in expanding these schools, and it is considered that a more

flexible approach with regards to Green Belt policy and schools is required for the long term.

Types of School

- 1.25 There is a diverse range of schools within Hertfordshire, and HCC has the statutory duty to ensure sufficient school places within its area irrespective of how education is provided. HCC is only the admitting authority for Community and Voluntary Controlled schools in the county. All other schools (Academies, including Free Schools, Voluntary Aided and Foundation Schools) are their own admitting authorities, determining their own admissions policies and over-subscription criteria.
- 1.26 All admitting authorities' admissions rules and policies must abide by the Admissions Code but HCC, in its role as commissioner of places rather than a provider has no power to direct schools that are their own admitting authority to provide additional places.

Education Planning Areas

- 1.27 For the purposes of school place planning, HCC is divided into geographical education planning areas (epas). There are a total of 22 secondary epas within the county and each of these contains one or more primary epas. The forecasts are produced to planning area level, not to individual schools.

Appendix 1v



**Resources & Performance
Property**



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HERTFORDSHIRE PROPERTY
Hertfordshire County Council
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Telephone 01992 588104
Minicom 01992 556611
Email: jacqueline.nixon@hertfordshire.gov.uk
Contact: Jacqueline Nixon
My ref:
Date 6 April 2016

Dear Louise

2011 Census Update and HCC Pupil Yield Models

You may be aware that the County Council has considered the 2011 Census now that specific information from it has become available to use. The information is being used to update the Planning Obligations Toolkit model which predicts child yield in new developments and to help to inform the Childrens Services pupil forecasts. We have asked the County Council's demographer to also advise how this information affects the standard 1FE:500 dwellings ratio (i.e. derived from a previous study of developments in Hertfordshire), (where 1 form of entry (FE) comprises 30 children per year group) used to plan school places in the context of preparing Local Plans. The work undertaken to date is now being tested, however it is considered sufficient confidence exists for some information to be released now, and we are aware that you may be particularly interested in it for plan making purposes

Where development is proposed for the construction of habitable dwellings it is, in most instances, likely to result in a yielded number of children. The County Council has a statutory obligation to ensure sufficient provision of places (including child care and education) for the children of Hertfordshire and therefore seeks to ensure that where appropriate, local plans provide sites for new schools and planning obligations are sought from developers in order to mitigate the impact of new development. The scale of the requirement is dependent upon the number of children projected to arise from development. In relation to planning obligations this has historically been based upon a mathematical model which utilised customised 2001 census data outputs sourced from the Office for National Statistics (ONS). However, over the last decade or so a rise in the number of births, in conjunction with an associated increase in age specific fertility rates, has been observed which was indicative that education obligations sought from developers on the basis of the 2001 model outputs may be inadequate. The 2011 census provided the opportunity to update the pupil yield model with bedroom size specific, type and tenure data likely to reflect current housing and demographic statistics within the boundaries of Hertfordshire. Subsequent to the model data update

**Resources & Performance
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an example development of 1,000 dwellings utilising 2011 census based bedroom size, type and tenure mix and with a seven year build trajectory, determined that 1.01FE would arise from 500 dwellings. This has in fact further endorsed research previously conducted by the County Councils demographer which indicated that a ratio of 1:500 was relevant.

The County Council will therefore continue to seek 1FE :500 dwellings in relation to local plan making for the foreseeable future. With regards to planning obligations, as mentioned above, the updated Toolkit model is being tested at present. We are currently considering when to begin using it and will advise further. In addition, we are also reviewing the Planning Obligations Toolkit document and expect the update to be available later this year.

Yours sincerely

pp Andrea Gilmore

Jacqueline Nixon B.A.(Hons) M.A. MRTPI.
Head of Development Services
Property

Appendix 1w



Ruth Gray

From: Ailsa Davis <Ailsa.Davis@hertfordshire.gov.uk>
Sent: 14 April 2016 10:57
To: 'Nigel Smith'
Cc: David Hill; Simon Ellis; 'Louise.Symes@north-herts.gov.uk'; Andrea Gilmour; Jacqueline Nixon; Sarah McLaughlin
Subject: Education provision in North Herts / Local Plan
Attachments: NHDC letter to head of planning policy.pdf

Hi Nigel

I'm not sure whether this letter has found its way to you, but the attached was sent out a couple of weeks back to all the Districts updating them on HCC's latest position regarding calculating child yield from housing developments. Due to the evidence coming out of the 2011 census, as stated in the letter, HCC will continue to work on the basis of 1FE per 500 houses.

With regards to your comment in your original email dated 11 February that the latest Government projections do not tally with this, you stated that the source of this data is the 2012-SNPP / Household Projections. I have been advised by HCC's demographer that these projections are based on a cohort component type model which takes into account demographic characteristics prevalent around the time of the projection (e.g. births, deaths etc) and specifically does not account for any local/LAD based "political or other" factors which could make an area more attractive to a populace e.g. tax breaks for business, housing developments and so forth. Therefore, these projections give a less accurate picture than the census data, which is currently being used to update the HCC Property s106 toolkit and Childrens' Services forecast model.

Going forwards, and based on this evidence from the 2011 census, the education infrastructure requirements at both primary and secondary level identified in HCC Property representations to NHDC in relation to the planned housing growth in the Local Plan still stand.

Regards

Ailsa Davis
Senior Planning Officer, Development Services
Hertfordshire Property
Postal Point CHO313
Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN
Tel: 01992 588275 **Comnet/Internal:** 28275
Working days: Tuesday, Wednesday and Thursday

From: Ailsa Davis
Sent: 22 March 2016 15:36
To: 'Nigel Smith'
Cc: Jacqueline Nixon; Sarah McLaughlin; Andrea Gilmour
Subject: Education provision in North Herts / Local Plan

Nigel

Further to your email of 11 Feb (copied below), we have now had an internal meeting to discuss the points you raise regarding child yield and the 1FE:500 homes ratio. Please treat this email as a holding response pending the issue of

further information/evidence to you relating to an update of the HCC Property s106 toolkit model incorporating 2011 census data, which endorses the peak yield of 1FE per 500 dwellings.

More specifically, in relation to your comments below:

- Work is underway to monitor the original piece of research (county wide survey) in terms of reviewing completed developments to establish whether the 1FE:500 ratio is borne out in reality;
- As stated above, an update of the HCC Property s106 toolkit and Childrens' Services forecasting models has been undertaken to incorporate 2011 census data and is currently being written up to share;
- Can you advise what is the source of the 'latest Government population projections' you refer to? Is it the SNPP 2012 or Interim 2011?
- Site search work for a new secondary school site to serve Stevenage and North Herts has been commissioned and is due to be completed by the end of June. The results of this will be shared with you and will be submitted with the HCC Property representations to your next LP consultation.

As soon as the above information is available to share, I will forward it to you.

Regards

Ailsa Davis
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Tel: 01992 588275 Comnet/Internal: 28275
Working days: Tuesday, Wednesday and Thursday

From: Nigel Smith [<mailto:Nigel.Smith@north-herts.gov.uk>]
Sent: 11 February 2016 14:27
To: Ailsa Davis
Cc: David Hill; Simon Ellis; Clare Skeels
Subject: Education provision in North Herts / Local Plan

Hi Ailsa,

Good to meet you this morning and put a face to the name. Following up, I said I would drop you a line regarding the outstanding issues and concerns we have regarding education provision and our emerging Local Plan. As mentioned, we anticipate that the allocation (or otherwise) of sites through the plan are likely to be subject to particular scrutiny and we will need to satisfy all the relevant tests at examination.

Broadly speaking, the issues fall into three interrelated categories which are set out below. I'd be grateful if you could give these consideration. We will need to develop a position in consultation with one another over the next few months. However, if you have any initial thoughts or concerns, please get in touch.

I've deliberately left East of Luton of this list as, with the planning applications already in / anticipated, this is already a ship that is sailing its own course.

As mentioned, we are facing a particularly tight turnaround to meet the milestones set out in our recently adopted Local Development Scheme. We are broadly working to the following timetable:

- March – Finalise analysis of new sites promoted since the 'Preferred Options' consultation
- April – Identification of a 'preferred development scenario' for testing
- May / June – Testing implications of preferred development scenario with key service providers
- July – Approval of draft Local Plan by NHDC
- August to October – Consultation on draft Local Plan

I appreciate that there will be some substantial work associated with the below. However, a number of these issues have been around for some time now and we are increasingly under pressure to progress our Local Plan. I hope we can work co-operatively with each other to work through these matters and develop a solution for North Hertfordshire.

Issue 1: Justification of 1FE:500 homes ratio for additional provision

We have concerns around the overall justification for additional education requests and the evidence behind it.

With particular regard to the existing evidence behind the 1:500 ratio:

- It appears to have been generated from a relatively small county-wide survey;
- That survey was conducted some time ago and does not appear to have been subject to on-going monitoring; while
- A large amount of the requirement is derived from a 'statistical adjustment' from the survey average.

Although I appreciate the need for prudence in advance planning, the implications of setting requirements at (for example) 1:600, 1:700...etc needs to be understood. This could be the difference between additional schools, or the expansion of existing premises, being required or not. There needs to be an acceptable balance between the level of risk to which HCC are exposed and the impacts on development in terms of site yields, financial viability etc.

Linked to this is the fact that all additional future demand is effectively calculated on the basis it will happen simultaneously. There needs to be further consideration of how demand is profiled over time, how changes in living patterns (declining household sizes etc.) may change demand from within the existing stock etc.

As a high-level example, applying the 1:500 ratio to our anticipated housing target figure of 14,400 homes for North Herts would suggest a total 28.8FE of additional provision over the period 2011-2031. This equates to around ~6,000 additional places at primary school level (28.8×30 [class size] $\times 7$ [reception to Y6]). By way of contrast, the latest Government population projections ~ which broadly align with our proposed housing numbers ~ only anticipate a maximum increase of ~2,500 primary-aged children over the plan period.

Justification for the selection of the GA2 site at Great Ashby

Should the above still lead to an identified requirement for additional provision, we require further evidence on the site-selection process which has led to the identification of this site as the preferred location for additional secondary school provision for the Stevenage School Planning area. We are obliged to consider 'reasonable alternatives' before settling on a final strategy.

As well as looking at alternate locations in / immediately around Stevenage, these alternatives may include some more 'out of the box' options – such as the concept of modest 'all through' provision at Knebworth mentioned this morning (see below), thereby relieving pressure / releasing capacity elsewhere.

Settlement-wide solutions

Finally, we need to come to a series of solutions that work at settlement / school planning area level in consultation with yourselves and relevant landowners and promoters.

I'm aware that HCC hold a number of reserve sites that may could provide additional capacity in the education system. Presumably there is also some scope for the expansion of existing schools – either from within existing landholdings or with the acquisition of adjoining land.

As per above, the 'missing link' in the land to the east of Knebworth has now been promoted to us and we would be interested in exploring whether there is scope for a more comprehensive / holistic approach here that could realise some wider benefits – notably the concept of secondary school provision, either as an 'all-through' school linked to the existing Primary School or as a standalone proposition.

Similarly we have had, for example, additional sites promoted at Barkway and Codicote where the relocation and expansion (respectively) of existing schools could facilitate a comprehensive solution.

This process will need to be replicated across other towns and villages.

The other end of this equation is that, utilising some of these reserve sites could release some existing school premises for redevelopment over the plan period. On the presumption that HCC would seek to maximise value of these assets, any such sites should be promoted to NHDC for potential allocation / redevelopment asap, although I appreciate there may be a degree of circular logic here!

I currently envisage / suggest that we aim to set up a series of sessions in the second half of March or early April where we can work through these on an area-by-area basis to inform the 'preferred development scenario' identified above. This will ensure there aren't any unwanted surprises when we reach the testing stage.

Apologies for the length of the email, but I think it is helpful to be clear as to the additional work we consider is required. Feel free to forward this on within your organisation to those who may need to be involved.

Thanks
Nigel

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Appendix 1x



RESPONSE TO ADDITIONAL SITES

NORTH HERTFORDSHIRE DISTRICT COUNCIL

December 2015

Ailsa Davis
Senior Planning Officer
Development Services
Hertfordshire County Council

Areas with additional new sites

Ashwell

| Ref | Site | Dwellings |
|--|---|------------|
| AS1 | Land west of, Claybush Road | 33 |
| Total dwellings 2011-2031 | | 33 |
| New Site | Land at junction of Cow Lane and Springhead | 4 |
| New Site | Land at The Ruddery (west), Ashwell Street | 3 |
| New Site | Land at The Ruddery (east), Ashwell Street | 3 |
| New Site | Land north of Ashwell Street and south of Lucas Lane | 29 |
| New Site | Ashridge Farm Caravan Club, Ashwell Street | 66 |
| New Site | Land west of Station Road and north of Ashwell Street | 12 |
| Total dwellings 2011-2031 (incl. New Sites) | | 149 |

Education requirement:

| | |
|---|---------------|
| Total dwellings 2011-2031 | 0.01FE |
| Total dwellings 2011-2031 (incl. New Sites) | 0.3FE |

It was previously reported that funding would be sought to accommodate demand arising from Site AS1 (33 dwellings). 117 additional houses are proposed for Ashwell, this together with the 33 dwellings equates to a requirement 0.3FE. Ashwell Primary School (PAN of 38) is located on a confined site and already requires detached playing fields. The existing school has no potential to expand and has inadequate hard play. A new 2FE site would therefore be required and the existing school relocated to accommodate the proposed housing.

No additional housing beyond what currently is the Draft Preferred Options Consultation could therefore be accommodated.

Baldock

| Ref | Site | Dwellings |
|--|--|-------------|
| BA1 | Land north of Baldock | 2800 |
| BA2 | Land off, Clothall Road, Baldock (Clothall parish) | 260 |
| BA3 | South of, Clothall Common, Baldock (Clothall parish) | 214 |
| BA4 | East of, Clothall Common | 85 |
| BA5 | Land off, Yeomanry Drive | 15 |
| BA6 | Land at, Icknield Way | 14 |
| BA7 | r/o, Clare Crescent | 9 |
| BA8 | Works, station Road | 11 |
| BA9 | Adjoining Raban Court | 6 |
| Small sites allowance | | 52 |
| Total dwellings 2011-2031 | | 3466 |
| New Site | Deans Yard, South Road | 13 |
| Total dwellings 2011-2031 (incl. New Sites) | | 3479 |

Education requirement:

| | |
|---|------------|
| Total dwellings 2011-2031 | 7FE |
| Total dwellings 2011-2031 (incl. New Sites) | 7FE |

Breakdown:

| | |
|---|--------------|
| Site BA1 (2800 dwellings) | 5.6FE |
| Sites BA2-BA9 (679 dwellings) including small sites and new sites | 1.3FE |

The addition of a new site for 13 dwellings does not alter our earlier comments on sites BA1-BA9. In our earlier response we noted that in considering the scale in totality, the education infrastructure requirement would include:

- A pattern of new primary school sites to accommodate up to 8FE of primary provision, suitably located within the development to serve the new communities north and south of the railway
- 1 x 7FE secondary school site to the north of the railway, which could include all through education provision

The exact configuration of the above education infrastructure is still to be finalised and will need to be included in any masterplan. Some expansion of Knights Templar School is possible and could be considered in this exercise. This means that the proposals for schools shown on the illustrative masterplan drawings already submitted as representations are indicative only.

Barkway

| Ref | Site | Dwellings |
|--|-------------------------------|------------|
| BK1 | Land east of, Cambridge Road | 13 |
| BK2 | Land North of, Windmill Close | 18 |
| Total dwellings 2011-2031 | | 31 |
| New Site 308 | Barkway Golf Club | 128 |
| Total dwellings 2011-2031 (incl. New Sites) | | 159 |

Education requirement:

| | |
|---|---------------|
| Total dwellings 2011-2031 | 0.06FE |
| Total dwellings 2011-2031 (incl. New Sites) | 0.3FE |

In our February 2015 representations for 31 dwellings (BK1 and BK2) we advised that the existing school site is quite constrained and is considered difficult to expand should it ever be required to do so and although the scale of housing proposed is minimal it would be prudent that the reserve site allocation in the current Local Plan is carried forward into the new Local Plan.

This current document considers a site of 128 dwellings at Barkway Golf Club. The pupil yield from this site coupled with sites BK1 and BK2 would equate to (159 dwellings – around 0.3fe).

As before we would therefore request that it is prudent for the reserve school site to be carried forward into the new Local Plan.

Barley

| Ref | | Dwellings |
|----------------------------------|----------------------|-----------|
| New Site 309 | Land r/o High Street | 6 |
| Total dwellings 2011-2031 | | 6 |

Education requirement:

Total dwellings 2011-2031 (incl. New Sites) **0.01FE**

Previously there have been no site allocations, therefore no infrastructure requirements sought. 6 additional dwellings (site 308). Funding will be sought to ensure the local education infrastructure can accommodate the additional demand.

Bygrave

| Ref | | Dwellings |
|----------------------------------|-------------------------------------|-----------|
| New Site 310 | Land south of Bygrave Road, Baldock | 6 |
| Total dwellings 2011-2031 | | 6 |

Education requirement:

Total dwellings 2011-2031 (incl. New Sites) **0.01FE**

Previously there have been no site allocations, therefore no infrastructure requirements sought. This site (310) for 6 dwellings, whilst located in Bygrave, is directly adjacent to Baldock and therefore as per the Baldock comments above, there would be no change to our comments made in February 2015.

Codicote

| Ref | Site | Dwellings |
|--|--|------------|
| CD1 | Land south of, Cowards Lane | 73 |
| CD2 | Codicote Garden Centre | 58 |
| CD3 | Land NE of, The Close | 48 |
| Total dwellings 2011-2031 | | 179 |
| New Site 311 | Land at Pottersheath Road, Welwyn | 10 |
| New Site 313 | Land south of Heath Road | 237 |
| New Site 312 | Former Codicote Storm Overflow Tank, Rabley Heath Road | 31 |
| New Site 314 | Mansells Farm (A) | 50 |
| New Site 315 | Mansells Farm (B) | 36 |
| New Site 316 | Mansells Farm (C) | 37 |
| New Site 317 | Mansells Farm (D) | 44 |
| New Site 318 | Hollands Farm | 210 |
| Total dwellings 2011-2031 (incl. New Sites) | | 655 |

Education requirement:

| | |
|---|--------------|
| Total dwellings 2011-2031 | 0.4FE |
| Total dwellings 2011-2031 (incl. New Sites) | 1.3FE |

In our February 2015 reps we stated that the existing 1FE Codicote school site is constrained and current forecasts indicate a shortage of places from the existing community without any additional housing development. Expansion of the existing primary school is required; however there appear to be highway/site constraint issues.

It is requested that land adjoining the site be allocated to facilitate the expansion and potentially provide a new access to the site. The school cannot support any new housing in the village without this.

Should Land south of Heath Road (237 dwellings) be taken forward HCC would expect the developer to provide the necessary additional school land/access as part of their scheme – a masterplanning approach would appear appropriate.

Given that the existing school is 1FE and the additional land would facilitate expansion to 2FE, the maximum number of additional houses in the village that it can support is 500 (1FE = 500 houses). Therefore, not all of the new sites listed above could be supported.

Graveley

| Ref | Site | Dwellings |
|--|--------------------------------|-------------|
| NS1 | North of Stevenage | 1000 |
| Total dwellings 2011-2031 | | 1000 |
| New Site | Land at Chesfield Park (north) | 35 |
| New Site | Land at Chesfield Park (west) | 208 |
| New Site | Land at Chesfield Park (south) | 251 |
| New Site | NW of Chesfield | 37 |
| Total dwellings 2011-2031 (incl. New Sites) | | 1531 |

Education requirement:

| | |
|---|------------|
| Total dwellings 2011-2031 | 2FE |
| Total dwellings 2011-2031 (incl. New Sites) | 3FE |

We provided comments in May 2015 with regards to sites 319, 320 and 321 – land at Chesfield Park north, west and south. These comments were provided under the heading ‘Stevenage North’ in this paper and is adjacent to NS1.

In our previous response we stated that NS1 should be delivered jointly through a masterplan to be prepared with Stevenage Borough Council, which controls the adjoining land to the south, any additional sites should be considered as part of this exercise.

The proposed additional development of 531 dwellings equates to around 1fe. On this basis similar to our previous comments we would now be seeking a 3fe primary school within the NHDC land to the north of Stevenage, with any development adjacent to this within Stevenage having its own primary provision:

- 1 x 3fe primary school (NS1 and other new sites) and 1 x 1fe primary school (SBC adjoining land) with 1fe reserve expansion capacity.

The additional site (322) for 37 dwellings could be accommodated through the above new primary provision.

Great Ashby/Weston

| Ref | Site | Dwellings |
|--|---------------------------------|-------------|
| GA1 | Roundwood, North East Stevenage | 357 |
| GA2 | Land off Mendip Way | 500 |
| Total dwellings 2011-2031 | | 857 |
| New Site | Land north east of Great Ashby | 195 |
| Total dwellings 2011-2031 (incl. New Sites) | | 1052 |

Education requirement:

| | |
|---|--------------|
| Total dwellings 2011-2031 | 1.7FE |
| Total dwellings 2011-2031 (incl. New Sites) | 2.1FE |

We responded to site 323 in our May 2015 comments under the heading 'Great Ashby and NE Stevenage'.

With the additional site proposing a further 195 dwellings bringing the total to 1052, a new 2fe primary school would be sought in this area. The new school would take account of GA1, GA2 and the new site, although they are geographically separate, there would be movement/shift in the area in terms of access to primary school places and admissions.

Previously we had said GA1 could be accommodated within an existing primary school (The Leys), however recent and emerging development proposals on Wedgewood Way, Stevenage will look to either The Leys or Martinswood. In summary we would be seeking a new 2fe primary school in this area to serve the yield arising from the new developments.

NOTE - Site GA1 has already come forward as a planning application and contributions have been sought from this development towards the expansion of The Leys Primary School as this is the closest school currently to the development with expansion potential. However even with this development coming forward in advance, we would still seek a new 2fe primary school site as a result of the remaining housing sites and other sites coming forward in the northern Stevenage area.

New secondary school at Great Ashby – site of secondary school granted planning permission April 2010 (site GA2) should be designated as an education zone/allocation within the Local Plan to provide flexibility and ensure sufficient land is available to meet educational need.

Hitchin

| Ref | Site | Dwellings |
|--|--|-------------|
| HT1 | Highover Farm, Stotfold Road | 484 |
| HT2 | Land north of Pound Farm, London Road (St Ippolyts parish) | 67 |
| HT3 | Land south of, Oughtonhead Lane | 37 |
| HT4 | Land at, Lucas Lane | 26 |
| HT5 | Land at junction of Grays Lane &, Lucas Lane | 12 |
| HT6 | Land at junction of Grays Lane and, Crow Furlong | 41 |
| HT7 | Neighbourhood centre and adjoining properties, John Barker Place | 33 |
| HT8 | Cooks Way | 29 |
| HT9 | Centre for the Arts, Willian Road | 41 |
| Small sites allowance | | 172 |
| Total dwellings 2011-2031 | | 942 |
| New Site | Land at Ickleford Bury, Old Hale Way | 12 |
| New Site | North of Highover Farm | 254 |
| Total dwellings 2011-2031 (incl. New Sites) | | 1208 |

Education requirement:

Total dwellings 2011-2031

1.9FE

Total dwellings 2011-2031 (incl. New Sites)

2.4FE

In our May 2015 comments, we stated that the addition of a further 12 dwellings (site 325) is not considered to change our earlier comments. It would be prudent planning to identify a new 2fe primary school site to ensure sufficient provision to meet demand across Hitchin (from 954 new dwellings).

Bearton Green is a reserve school site in the current Local Plan and it would be prudent that the reserve site allocation is carried forward into the new Local Plan as this would provide flexibility in that if needed, the land could be used to facilitate expansion of an existing school by providing detached playing fields.

A further site allocation at North of Highover Farm (254 dwellings) could not be accommodated, as it tips the need from new dwellings over 2fe (around 1208 new homes) and there is very limited if any capacity in existing schools in that part of the town.

Some expansion of the existing secondary schools is considered feasible although capacity is limited and we would therefore seek appropriate planning policies, as indicated previously, to support the physical expansion of school sites to accommodate local demand. In this respect, removal of the Priory School from the Green Belt would be welcomed.

Holwell

| Ref | Site | Dwellings |
|----------------------------------|--------------|-----------|
| New Site | Bedford Road | 5 |
| Total dwellings 2011-2031 | | 5 |

Education requirement:

Total dwellings 2011-2031 (incl. New Sites)

0.01FE

Previously there were no site allocations therefore no education infrastructure requirements. Site 327 for 5 dwellings – we would seek education contributions from the development; the closest schools being either Pirton, Ickleford or across the border into Central Bedfordshire.

Ickleford

| Ref | Site | Dwellings |
|--|--|------------|
| IC1 | Land off, Duncots Close | 9 |
| IC2 | Buford Garage, Bedford road | 48 |
| Total dwellings 2011-2031 | | 57 |
| New Site | Land at Bedford Road | 180 |
| New Site | Land at Ickleford Manor, Turnpike Lane | 9 |
| New Site | Arnolds Farm, Chambers Lane | 12 |
| New Site | Land at Ramerick | 141 |
| Total dwellings 2011-2031 (incl. New Sites) | | 399 |

Education requirement:

Total dwellings 2011-2031

0.1FE

Total dwellings 2011-2031 (incl. New Sites)

0.8FE

Our earlier response noted that funding would be sought to ensure that local education infrastructure can accommodate the additional demand. The proposed new sites would generate a requirement of 0.8FE. Ickleford primary school is a 1FE school on a confined site. A site for a 2FE Primary School would be required and the relocation of the existing school.

Kings Walden

| Ref | Site | Dwellings |
|--|--|-----------|
| KW1 | Allotments west of The Heath, Breachwood Green | 16 |
| Total dwellings 2011-2031 | | 16 |
| New Site | Land at Colemans Green | 2 |
| New Site | Land east of Brownings Cottage, Colemans Road | 22 |
| Total dwellings 2011-2031 (incl. New Sites) | | 39 |

Education requirement:

Total dwellings 2011-2031

0.03FE

Total dwellings 2011-2031 (incl. New Sites)

0.07FE

Our recent response stated that funding will be sought to ensure the local education infrastructure can accommodate the additional demand. Although the additional sites double the number of dwellings in Kings Walden it is still under 0.1FE of requirement and our previous comments still stand.

Knebworth

| Ref | Site | Dwellings |
|--|---------------------------------------|-----------|
| KB1 | Land at, Deards End | 227 |
| KB2 | Land at, Gypsy Lane | 184 |
| Total dwellings 2011-2031 | | 433 |
| New Site | Land rear of Redwood, Deards End Lane | 14 |
| New Site | Land east of Old Lane | 55 |
| New Site | Cnebba's Field, Old Knebworth | 10 |
| Total dwellings 2011-2031 (incl. New Sites) | | 513 |

Education requirement:

Total dwellings 2011-2031

0.8FE

Total dwellings 2011-2031 (incl. New Sites)

1FE

Our earlier response stated that additional school places would be required. The requirement for a new 1 FE primary school site on the west of the town remains with the additional sites. It would be preferable if the large sites could be phased to come forward together to support the delivery of additional primary places.

The closest secondary schools to Knebworth are in south Stevenage. Long term proposed housing development and population growth suggests insufficient capacity within the existing secondary schools in Stevenage to accommodate future forecast demand. Therefore, as indicated above, it would be prudent to reserve a secondary school site at Great Ashby & NE Stevenage to plan for future population pressures.

Letchworth

| Ref | Site | Dwellings |
|--|---|-----------|
| LG1 | North of Letchworth | 1000 |
| LG2 | George W King Site, Blackhorse Road | 159 |
| LG3 | Land east of Talbot Way | 112 |
| LG4 | Land north of former Norton School, Norton Road | 56 |
| LG5 | Land at Birds Hill | 50 |
| LG6 | Land off Radburn Way | 27 |
| LG7 | Garage, Station Road | 24 |
| LG8 | Pixmore Industrial estate | 16 |
| LG9 | Former Lannock School | 11 |
| LG10 | Former playing field, Croft Lane | 37 |
| LG11 | Garden Square Shopping Centre | 45 |
| Small sites allowance | | 172 |
| Total dwellings 2011-2031 | | 1709 |
| New Site | Freeman House, Radburn Way | 6 |
| New Site | Foundation House | 31 |
| New Site | Glebe Road industrial estate | 5 |
| Total dwellings 2011-2031 (incl. New Sites) | | 1751 |

Education requirement:

Total dwellings 2011-2031

3.4FE

| | |
|--|--------------|
| Total dwellings 2011-2031 (incl. New Sites) | 3.5FE |
| Site LG1 (1000 dwellings) Current Planning Application | 2FE |
| Site LG2-LG11 including small sites allowance and new site (715 dwellings) | 1.4FE |

Three additional sites have been identified for 42 dwellings, it is considered that this will not change the response submitted in February 2015, summarised as follows:

Site LG1 (1000 dwellings) 2FE - Additional school places would be required. To be provided through provision of a new 2FE primary school site as part of a masterplan for this area. Feasibility work is required to establish if the existing secondary schools have sufficient expansion potential to meet the demand from the scale of development.

Sites LG2 - LG11 and incl. small site allowance and new site (715 dwellings) 1.4FE - Additional school places would be required. To be provided through expansion of existing schools (financial contributions required), however, it would be prudent if the reserve school site allocation at Southern Way, which is on the proposals map of the current local plan, is carried forward into the new local plan and excluded from the Green Belt.

Site LG6 – Land off Radburn Way – LG6 is identified for 27 dwellings. The site of Freeman House (New site, 6 dwellings) is owned by HCC and directly adjoins Site LG6

Offley

| Ref | Site | Dwellings |
|--|----------------------------------|------------|
| New Site | Land east of Selsey Drive, Luton | 228 |
| New Site | Dancote, Cockernhoe Green | 11 |
| New Site | Bakers Close | 42 |
| Total dwellings 2011-2031 (incl. New Sites) | | 281 |

Education requirement:

| | |
|---------------------------|--|
| Total dwellings 2011-2031 | 0.5FE (HCC) |
| | 0.9FE (Luton 305 dwellings = 1FE) |

Site 341 (228 dwellings) is on the District boundary and is in close proximity to Putteridge Junior School within Luton.

Site 340 (11 dwellings) is located within the village of Cockernhoe and is surrounded by the current site allocation for 'East of Luton'. It would be anticipated that the yield from this site could be provided for within any new primary provision proposed as part of the larger East of Luton development. This may be required to be master planned as part of that development.

Site 342 (42 dwellings) – our February 2015 representations noted that funding would be required to ensure the local education infrastructure can accommodate the additional demand from the proposed 62 dwellings (of which this site has already come forward as a planning application and is being built out). It would be expected that any yield from this development could be accommodated through expansion of the local school.

Pirton

| Ref | Site | Dwellings |
|--|-----------------------------|------------|
| PT1 | Land east of, Priors Hill | 88 |
| PT2 | Holwell Turn, West Lane | 47 |
| Total dwellings 2011-2031 | | 135 |
| New Site | Land at Burge End | 1 |
| New Site | Land north of Hambridge Way | 45 |
| Total dwellings 2011-2031 (incl. New Sites) | | 181 |

Education requirement:

Total dwellings 2011-2031

0.3FE

Total dwellings (incl. New sites)

0.4FE

The village can accommodate PT1 and PT2, but no additional sites as we now know that the primary school cannot expand beyond 1FE. Therefore sites 343 and 344 cannot be accommodated.

Royston

| Ref | Site | Dwellings |
|--|---------------------------------------|-------------|
| RY1 | land west of Ivy Farm, Baldock Road | 311 |
| RY2 | Land north of, Newmarket Road (north) | 300 |
| RY3 | Land north of, Betjeman Road | 124 |
| RY4 | Land north of, Lindsay Close | 100 |
| RY5 | Agricultural supplier, Garden Walk | 37 |
| RY6 | Royston FC, Garden Walk | 44 |
| RY7 | Anglian Business Park | 42 |
| RY8 | Land at, Lumen Road | 15 |
| Small sites allowance | | 84 |
| Total dwellings 2011-2031 | | 1057 |
| New Site | Land south of Newmarket Road | 285 |
| Total dwellings 2011-2031 (incl. New Sites) | | 1342 |

Education requirement:

Total dwellings 2011-2031

2.1FE

Total dwellings 2011-2031 (incl. New Sites)

2.7FE

An additional 285 dwellings are proposed for Royston. Additional school places would be required. The primary population in Royston is increasing and, to ensure sufficient local places, the county council is considering proposals for an additional 1FE of permanent capacity within the First Schools in the town. All First schools are currently full and feasibility work suggests that beyond this current permanent expansion phase, there is no further expansion capacity available. It would therefore be prudent to allocate a new 2FE First School site to ensure the future population and yield arising from the new housing can access a local school place.

St Ippolyts

| Ref | Site | Dwellings |
|--|-------------------------------|-----------|
| SI1 | Land south of Waterdell Lane | 72 |
| SI2 | Land south of, Stevenage Road | 24 |
| Total dwellings 2011-2031 | | 96 |
| New Site | Land east of London Road | 37 |
| Total dwellings 2011-2031 (incl. New Sites) | | 133 |

Education requirement:

Total dwellings 2011-2031

0.2FE

Total dwellings 2011-2031 (incl. New Sites)

0.3FE

As per our May 2015 comments, the addition of the new site (37 dwellings) increases the yield from new housing by 0.1fe to 0.3fe. Current analysis indicates that there are sufficient places to meet the local population, however an increase of dwellings in the village may impact upon this and the additional yield may be difficult to accommodate at this school. St Ippolyts C of E (Aided) Primary had a PAN of 20 and would likely require additional classrooms to expand the school up to 1fe, although it should be noted that feasibility advice indicates this would be difficult to achieve on the current site.

St Paul's Walden

| Ref | Site | Dwellings |
|--|---|-----------|
| SP1 | Land south of, High Street, Whitwell | 44 |
| Total dwellings 2011-2031 | | 44 |
| New Site | Land between Horn Hill and Bendish Lane, Whitwell | 60 |
| New Site | Rose Farm | 6 |
| Total dwellings 2011-2031 (incl. New Sites) | | 110 |

Education requirement:

Total dwellings 2011-2031

0.01FE

Total dwellings 2011-2031 (incl. New Sites)

0.2FE

Our May 2015 comments referred to site 348 Land between Horn Hill and Bendish Lane, Whitwell accommodating 119 dwellings which increased the yield from housing sites to 0.3fe.

This current consultation indicates this site would propose 60 additional dwellings and a further site at Rose Farm for 6 dwellings. This thereby halves the original additional dwellings proposed at site 348.

Current analysis indicates that there are sufficient places to meet the local population; however an increase of dwellings in the village may impact upon this. Feasibility advice indicates that the existing St Paul's Walden Primary (PAN 17) site is confined but could expand up to 1fe at most and could therefore expand to accommodate pupils from this development.

We are aware that there is a current planning application for 60 dwellings on land between Horn Hill and Bendish Lane, instead of 119 as originally advised. This site is located directly adjacent to the existing primary school site.

Weston

| Ref | Site | Dwellings |
|--|---------------------------------|-----------|
| WE1 | Land off Hitchin Road | 25 |
| Total dwellings 2011-2031 | | 25 |
| New Site | Land off Hitchin Road | 16 |
| New Site | Rear of Town Farm, Hitchin Road | 37 |
| Total dwellings 2011-2031 (incl. New Sites) | | 78 |

Education requirement:

Total dwellings 2011-2031

0.05FE

Total dwellings 2011-2031 (incl. New Sites)

0.2FE

As per our May 2015 comments, the addition of the new sites (53 dwellings) increases the requirement to 0.2fe. Current analysis indicates that there are sufficient places to meet the demand from the local population, however an increase of dwellings in the village may impact upon this and the additional yield may be difficult to accommodate at this school. Further feasibility required to establish the expansion options in this area.

Appendix One – Educational Context

1.0 Introduction

- 1.1 To assist with interpreting the information provided, the background to the current situation regarding school places within the District, together with a definition of the terms used throughout this document, is given below.

Role of the County Council

- 1.2 Hertfordshire County Council (HCC) is the local education authority and is subject to a number of statutory duties and responsibilities including:
- Promoting high standards of education
 - Planning and commissioning school places in its local authority area
 - Extending diversity and choice
 - Co-ordinating admissions for all maintained schools
 - Co-ordinating admissions for Academies and Free Schools – where requested to do so
 - Resourcing the shared maintenance, improvement to, and provision of, the built school environment, and securing value for money.
- 1.3 In coming to a view about the most appropriate strategy in response to development growth proposals, HCC is looking for a solution which takes into account each of these elements.

School Planning Context

- 1.4 HCC has a duty to secure sufficient school places in its area, ensuring that every child has access to a school place. HCC fulfils these planning responsibilities by forecasting the demand for school places in order to identify an appropriate balance between supply and demand. It negotiates the right number of places on an annual basis, whilst in parallel undertaking longer term strategic planning.

Rising Demand

- 1.5 Hertfordshire has experienced a significant rise in the demand for primary places across the County in recent years in line with the picture nationally. The rise is not consistent across the county, with some areas experiencing substantial increases in the primary aged population, whilst in some more rural areas demand is less pressing or currently remains fairly static. More information on the rising demand is available through HCC's strategy document '*Meeting the Rising Demand for School Places*', available at <http://www.hertsdirect.org/services/edlearn/aboutstatesch/planning/>

Forecasts

- 1.6 HCC produces pupil forecasts every six months for both Reception and Year 7 demand. At a primary level, HCC forecast 5 years ahead and secondary forecasts stretch to 10 years in the future.
- 1.7 These forecasts are based on actual date of 0-5 year olds in an area, historic pupil movement as well as an assumed pupil yield from new housing developments. The forecasts have taken account of an assumed housing growth trajectory for the longer term, as provided by Hertfordshire's District and Borough Councils.
- 1.8 Latest forecasts are provided within the body of this response. These project demand for admissions into Reception and Year 7 and do not include any margin. HCC would normally plan a surplus of 5 to 10% across an area to allow for fluctuations in forecast demand.
- 1.9 Further information on the methodology around the pupil forecasts can be found at <http://www.hertsdirect.org/services/edlearn/aboutstatesch/planning/>.

New Schools

- 1.10 The way in which new schools are set up has undergone significant change in recent years. The County Council's role as a commissioner of places is such that where it considered there is a basic need for a new school it must:
- Seek proposals to establish an academy/free school; or (if unsuccessful)
 - Hold a statutory competition; or (if unsuccessful)
 - Publish its own proposals for a new maintained school
- 1.11 The County Council remains responsible for providing the site and meeting all associated capital and pre/post-opening costs, in instances where the new school provision is meeting basic need. Therefore, the County Council continues to hold the key role in negotiating S106 contributions for, and the provision of, all school infrastructure.

Principles

Forms of Entry

- 1.12 School provision is often described in terms of 'forms of entry'. 1 form of entry (f.e.) equals 30 places per year group.
- 1.13 Primary schools have seven year groups from Reception through to Year 6. HCC has a preference for primary schools of 2 f.e. or more, as this larger size provides improved opportunities for delivery of a broad education curriculum and staff development, as well as offering the ability to better manage fluctuations in demand. A 2fe primary school will have 7 year groups of 60 pupils (420 in total), plus a Nursery class where offered.
- 1.14 Secondary schools have five year groups, from Year 7 through to Year 11, and Sixth Forms with lower and upper year groups. HCC has a preference for secondary schools of 6 to 10f.e. as this offers improved opportunities for the delivery of a broad education curriculum. A 6fe school will have 5 year groups of 180 pupils (1080 in total) plus a Sixth Form.

Pupil Yield

- 1.15 When undertaking high level school place planning related to new residential development, HCC determines child yield based on a ratio of 1f.e. per 500 dwellings to be 97.5% confident of not underestimating yield.
- 1.16 This is based on a study of 49 Hertfordshire developments undertaken by HCC's demographer (c. 2008). This work produced a yield range of 1f.e. per 500 dwellings (42 children per 100 dwellings / 97.5% confidence) to 1f.e. per 850 dwellings (24.7 children per 100 dwellings/50% confidence).
- 1.17 This range is referred to throughout this document. The County Council applies the upper end of the range, 1f.e.per 500 dwellings, in the first instance to ensure prudent planning.
- 1.18 When considering actual proposals or planning applications, the County Council uses specific development forecasting models to ascertain more tailored demographic profiles, including pupil yields.

Developer Contributions

- 1.19 When planning for new education infrastructure arising through development growth, HCC works to a number of consistent principles:
- That developer contributions will fund the relevant school infrastructure requirements arising from housing growth, in conjunction with an assessment of local circumstances
 - That strategic housing sites will provide appropriate school infrastructure that is sufficient to meet the demand generated by the development, and that this should be through both the provision of school site(s) and the funding for school builds
 - That in general, any current capacity is there for the existing community and the normal fluctuations in demand – HCC will seek contributions of some form from all developments for the purpose of prudent planning.

Site Size

- 1.20 School site standards have recently changed (School Premises Regulations, 2012) and provide a much less stringent approach to school site standards. The County Council has previously agreed to continue using the site areas that refer to Building Bulletin 98 (secondary) and 99 (primary) guidance, as these are deemed a suitable standard for school premises. In light of the new BB103 guidance however, the County Council is in the process of reviewing its current position. Until this review is complete it will continue to refer to BB98/99.

Appendix 1y



RESPONSE TO ADDITIONAL SITES

NORTH HERTFORDSHIRE DISTRICT COUNCIL

29 May 2015

Matthew Wilson
Senior Planning Officer
Development Services
Hertfordshire County Council

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Areas with additional new sites

Ashwell

| Ref | Site | Dwellings |
|--|---|------------|
| AS1 | Land west of, Claybush Road | 33 |
| Total dwellings 2011-2031 | | 33 |
| New Site | Land at junction of Cow Lane and Springhead | 4 |
| New Site | Land at The Ruddery (west), Ashwell Street | 3 |
| New Site | Land at The Ruddery (east), Ashwell Street | 3 |
| New Site | Land north of Ashwell Street and south of Lucas Lane | 29 |
| New Site | Ashridge Farm Caravan Club, Ashwell Street | 66 |
| New Site | Land west of Station Road and north of Ashwell Street | 12 |
| Total dwellings 2011-2031 (incl. New Sites) | | 149 |

Education requirement:

| | |
|---|---------------|
| Total dwellings 2011-2031 | 0.01FE |
| Total dwellings 2011-2031 (incl. New Sites) | 0.3FE |

It was previously report that funding would be sought to accommodate demand arising from Site AS1 (33 dwellings). 117 additional sites are proposed for Ashwell, this together with the 33 dwellings equates to a requirement 0.3FE. Ashwell Primary School (PAN of 38) is located on a confined site and already requires detached playing fields. A new 2FE site would be required and the existing school be relocated.

Baldock

| Ref | Site | Dwellings |
|--|--|-------------|
| BA1 | Land north of Baldock | 2800 |
| BA2 | Land off, Clothall Road, Baldock (Clothall parish) | 260 |
| BA3 | South of, Clothall Common, Baldock (Clothall parish) | 214 |
| BA4 | East of, Clothall Common | 85 |
| BA5 | Land off, Yeomanry Drive | 15 |
| BA6 | Land at, Icknield Way | 14 |
| BA7 | r/o, Clare Crescent | 9 |
| BA8 | Works, station Road | 11 |
| BA9 | Adjoining Raban Court | 6 |
| Small sites allowance | | 52 |
| Total dwellings 2011-2031 | | 3466 |
| New Site | Deans Yard, South Road | 13 |
| Total dwellings 2011-2031 (incl. New Sites) | | 3479 |

Education requirement:

Total dwellings 2011-2031 **7FE**

Total dwellings 2011-2031 (incl. New Sites) **7FE**

Comprising of:

Site BA1 (2800 dwellings) **5.6FE**

Sites BA2-BA9 (679 dwellings) including small sites and new sites **1.3FE**

The addition of a new site for 13 dwellings does not alter our earlier comments on sites BA1-BA9. In our earlier response we noted that in considering the scale in totality, the education infrastructure requirement would include:

- A pattern of new primary school sites to accommodate up to 8FE of primary provision, suitably located within the development to serve the new communities north and south of the railway
- 1 x 7FE secondary school site to the north of the railway, which could include all through education provision

The exact configuration of the above education infrastructure is still to be finalised and will need to be included in any masterplan. Some expansion of Knights Templar School is possible and could be considered in this exercise. This means that the proposals for schools shown on the illustrative masterplan drawings already submitted as representations are indicative only.

Codicote

| Ref | Site | Dwellings |
|--|--|------------|
| CD1 | Land south of, Cowards Lane | 73 |
| CD2 | Codicote Garden Centre | 58 |
| CD3 | Land NE of, The Close | 48 |
| Total dwellings 2011-2031 | | 179 |
| New Site | Land at Pottersheath Road, Welwyn | 10 |
| New Site | Land south of Heath Road | 237 |
| New Site | Former Codicote Storm Overflow Tank, Rabley Heath Road | 31 |
| Total dwellings 2011-2031 (incl. New Sites) | | 457 |

Education requirement:

Total dwellings 2011-2031

0.4FE

Total dwellings 2011-2031 (incl. New Sites)

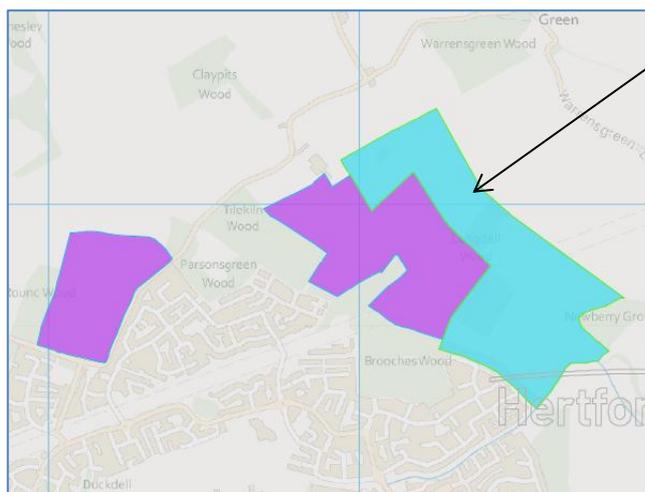
0.9FE

In our February 2015 reps we stated that the existing 1FE Codicote school site is constrained and current forecasts indicate a shortage of places from the existing community without any additional housing development. Expansion of the existing primary school is likely to be required albeit there appear to be highway/site constraint issues. HCC requested that land adjoining the site be allocated to facilitate the expansion and potentially provide a new access to the site.

Should the additional housing on Land south of Heath Road (237 dwellings) be taken forward HCC would expect the developer to provide the necessary additional school land/access as part of their scheme – a masterplanning approach would appear appropriate.

The higher level of housing in Codiate would better support the scale of any enlargement of the school in educational terms.

Great Ashby & NE Stevenage



Land north east of Great Ashby

| Ref | Site | Dwellings |
|--|---------------------------------|-------------|
| GA1 | Roundwood, North East Stevenage | 357 |
| GA2 | Land off Mendip Way | 500 |
| Total dwellings 2011-2031 | | 857 |
| New Site | Land north east of Great Ashby | 195 |
| Total dwellings 2011-2031 (incl. New Sites) | | 1052 |

Education requirement:

Total dwellings 2011-2031

1.7FE

Total dwellings 2011-2031 (incl. New Sites)

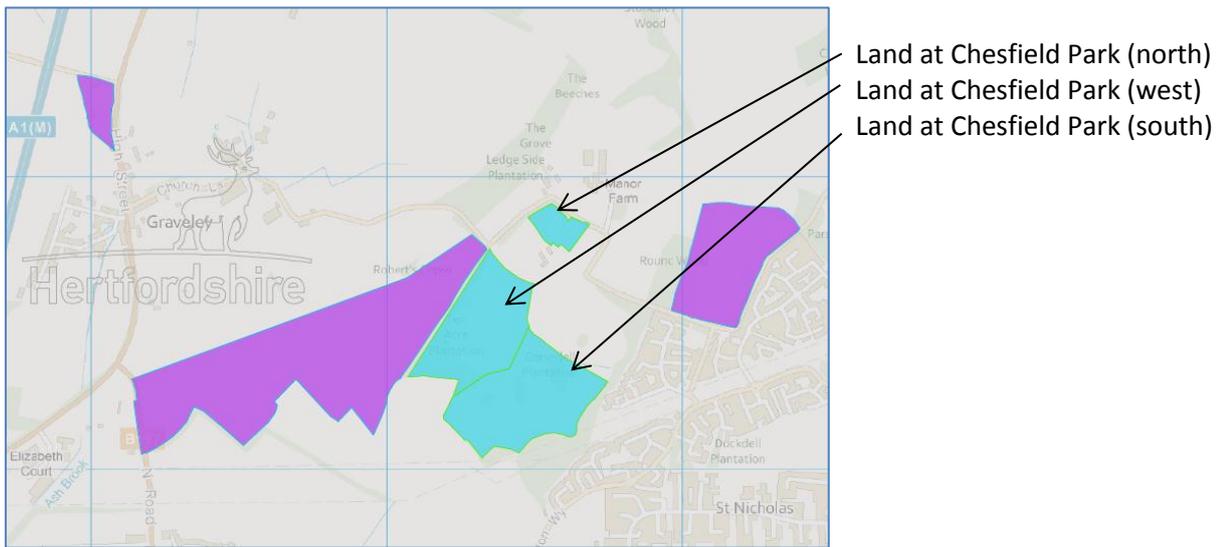
2.1FE

With the additional site proposing a further 195 dwellings bringing the total to 1052, a new 2FE primary school would be sought in this area. The new school would take account of GA1, GA2 and the new site, although they are geographically separate, there would be movement/shift in the area in terms of access to primary school places and admissions.

Previously we had said GA1 could be accommodated within an existing primary school (The Leys), however recent and emerging development proposals on Wedgewood Way, Stevenage will look to either The Leys or Martinswood. In summary we would be seeking a new 2fe primary school in this area to serve the yield arising from the new developments.

Stevenage Borough Council is also proposing housing within their boundary to the north of the settlement. Any strategic housing site that spans both North Herts and Stevenage should be treated in a holistic manner in terms of infrastructure provision.

Stevenage North



| Ref | Site | Dwellings |
|--|--------------------------------|-------------|
| NS1 | North of Stevenage | 1000 |
| Total dwellings 2011-2031 | | 1000 |
| New Site | Land at Chesfield Park (north) | 35 |
| New Site | Land at Chesfield Park (west) | 208 |
| New Site | Land at Chesfield Park (south) | 251 |
| Total dwellings 2011-2031 (incl. New Sites) | | 1494 |

Education requirement:

Total dwellings 2011-2031

2FE

Total dwellings 2011-2031 (incl. New Sites)

3FE

In our previous response we stated that NS1 should be delivered jointly through a masterplan to be prepared with Stevenage Borough Council, which controls the adjoining land to the south, any additional sites should be considered as part of this exercise.

The proposed additional development of 494 dwellings equates to around 1FE. On this basis similar to our previous comments we would now be seeking a 3fe primary school within the NHDC land to the north of Stevenage, with any development adjacent to this within Stevenage having its own primary provision:

- 1 x 3fe primary school (NS1 and other new sites) and 1 x 1fe primary school (SBC adjoining land) with 1FE reserve expansion capacity.
- New secondary school at Great Ashby – site of secondary school granted planning permission April 2010 should be designated as an education zone/allocation within the Local Plan to provide flexibility and ensure sufficient land is available to meet educational need.

Hitchin

| Ref | Site | Dwellings |
|--|--|------------|
| HT1 | Highover Farm, Stotfold Road | 484 |
| HT2 | Land north of Pound Farm, London Road (St Ippolyts parish) | 67 |
| HT3 | Land south of, Oughtonhead Lane | 37 |
| HT4 | Land at, Lucas Lane | 26 |
| HT5 | Land at junction of Grays Lane &, Lucas Lane | 12 |
| HT6 | Land at junction of Grays Lane and, Crow Furlong | 41 |
| HT7 | Neighbourhood centre and adjoining properties, John Barker Place | 33 |
| HT8 | Cooks Way | 29 |
| HT9 | Centre for the Arts, Willian Road | 41 |
| Small sites allowance | | 172 |
| Total dwellings 2011-2031 | | 942 |
| New Site | Land at Ickleford Bury, Old Hale Way | 12 |
| Total dwellings 2011-2031 (incl. New Sites) | | 954 |

Education requirement:

Total dwellings 2011-2031

1.9FE

Total dwellings 2011-2031 (incl. New Sites)

1.9FE

The addition of a further 12 dwelling within Hitchin is not considered to change our earlier comments. It would be prudent planning to identify of a new 2FE primary school site to ensure sufficient provision to meet demand across Hitchin. Bearton Green is a reserve school site in the current Local Plan and it would be prudent that the reserve site allocation is carried forward into the new Local Plan as this would provide flexibility in that is needed, the land could be used to facilitate expansion of an existing school by providing detached playing fields.

Some expansion of the existing secondary schools is considered feasible although capacity is limited and we would therefore seek appropriate planning policies, as indicated previously, to support the physical expansion of school sites to accommodate local demand. In this respect, removal of the Priory School from the Green Belt would be welcomed.

Ickleford

| Ref | Site | Dwellings |
|--|--|------------|
| IC1 | Land off, Duncots Close | 9 |
| IC2 | Buford Garage, Bedford road | 48 |
| Total dwellings 2011-2031 | | 57 |
| New Site | Land at Bedford Road | 180 |
| New Site | Land at Ickleford Manor, Turnpike Lane | 9 |
| New Site | Arnolds Farm, Chambers Lane | 12 |
| New Site | Land at Ramerick | 141 |
| Total dwellings 2011-2031 (incl. New Sites) | | 399 |

Education requirement:

Total dwellings 2011-2031

0.1FE

Total dwellings 2011-2031 (incl. New Sites)

0.8FE

Our earlier response noted that funding would be sought to ensure that local education infrastructure can accommodate the additional demand. The proposed new sites would generate a requirement of 0.8FE. Ickleford primary school is a 1FE school on a confined site. A site for a 2FE Primary School would be required and the relocation of the existing school.

Kings Walden

| Ref | Site | Dwellings |
|--|--|-----------|
| KW1 | Allotments west of The Heath, Breachwood Green | 16 |
| Total dwellings 2011-2031 | | 16 |
| New Site | Land at Colemans Green | 2 |
| New Site | Land east of Brownings Cottage, Colemans Road | 22 |
| Total dwellings 2011-2031 (incl. New Sites) | | 39 |

Education requirement:

Total dwellings 2011-2031

0.03FE

Total dwellings 2011-2031 (incl. New Sites)

0.07FE

Our recent response stated that funding will be sought to ensure the local education infrastructure can accommodate the additional demand. Although the additional sites double the number of dwellings in Kings Walden it is still under 0.1FE of requirement and our previous comments still stand.

Knebworth

| Ref | Site | Dwellings |
|--|---------------------------------------|-----------|
| KB1 | Land at, Deards End | 227 |
| KB2 | Land at, Gypsy Lane | 184 |
| Total dwellings 2011-2031 | | 433 |
| New Site | Land rear of Redwood, Deards End Lane | 14 |
| New Site | Land east of Old Lane | 55 |
| Total dwellings 2011-2031 (incl. New Sites) | | 503 |

Education requirement:

Total dwellings 2011-2031

0.8FE

Total dwellings 2011-2031 (incl. New Sites)

1FE

Our earlier response stated that additional school places would be required. The requirement for a new 1 FE primary school site on the west of the town remains with the additional sites. It would be preferable if the large sites could be phased to come forward together to support the delivery of additional primary places.

The closest secondary schools to Knebworth are in south Stevenage. Long term proposed housing development and population growth suggests insufficient capacity within the existing secondary schools in Stevenage to accommodate future forecast demand. Therefore, as indicated above, it would be prudent to reserve a secondary school site at Great Ashby & NE Stevenage to plan for future population pressures.

Letchworth

| Ref | Site | Dwellings |
|--|---|-----------|
| LG1 | North of Letchworth | 1000 |
| LG2 | George W King Site, Blackhorse Road | 159 |
| LG3 | Land east of Talbot Way | 112 |
| LG4 | Land north of former Norton School, Norton Road | 56 |
| LG5 | Land at Birds Hill | 50 |
| LG6 | Land off Radburn Way | 27 |
| LG7 | Garage, Station Road | 24 |
| LG8 | Pixmore Industrial estate | 16 |
| LG9 | Former Lannock School | 11 |
| LG10 | Former playing field, Croft Lane | 37 |
| LG11 | Garden Square Shopping Centre | 45 |
| Small sites allowance | | 172 |
| Total dwellings 2011-2031 | | 1709 |
| New Site | Freeman House, Radburn Way | 6 |
| Total dwellings 2011-2031 (incl. New Sites) | | 1715 |

Education requirement:

| | |
|---|--------------|
| Total dwellings 2011-2031 | 3.4FE |
| Total dwellings 2011-2031 (incl. New Sites) | 3.4FE |

| | |
|--|--------------|
| Site LG1 (1000 dwellings) Current Planning Application | 2FE |
| Site LG2-LG11 including small sites allowance and new site (715 dwellings) | 1.4FE |

One additional site has been identified for 6 dwellings, it is considered that this will not change the response submitted in February 2015, summarised as follows:

Site LG1 (1000 dwellings) 2FE - Additional school places would be required. To be provided through provision of a new 2FE primary school site as part of a masterplan for this area. Feasibility work is required to establish if the existing secondary schools have sufficient expansion potential to meet the demand from the scale of development.

Sites LG2 - LG11 and incl. small site allowance and new site (715 dwellings) 1.4FE - Additional school places would be required. To be provided through expansion of existing schools (financial contributions required), however, it would be prudent if the reserve school site allocation at Southern Way, which is on the proposals map of the current local plan, is carried forward into the new local plan and excluded from the Green Belt.

Site LG6 – Land off Radburn Way – LG6 is identified for 27 dwellings. The site of Freeman House (New site, 6 dwellings) is owned by HCC and directly adjoins Site LG6

Putteridge Park (within the parish of Offley)

| Ref | Site | Dwellings |
|--|----------------------------------|------------------|
| New Site | Land east of Selsey Drive, Luton | 228 |
| Total dwellings 2011-2031 (incl. New Sites) | | 228 |

Education requirement:

Total dwellings 2011-2031

0.5FE to 0.3FE (HCC)

0.8FE (Luton 305 dwellings = 1FE)

The additional site is on the District boundary and is in close proximity to Putteridge Junior School within Luton.

Royston

| Ref | Site | Dwellings |
|--|---------------------------------------|-----------|
| RY1 | land west of Ivy Farm, Baldock Road | 311 |
| RY2 | Land north of, Newmarket Road (north) | 300 |
| RY3 | Land north of, Betjeman Road | 124 |
| RY4 | Land north of, Lindsay Close | 100 |
| RY5 | Agricultural supplier, Garden Walk | 37 |
| RY6 | Royston FC, Garden Walk | 44 |
| RY7 | Anglian Business Park | 42 |
| RY8 | Land at, Lumen Road | 15 |
| Small sites allowance | | 84 |
| Total dwellings 2011-2031 | | 1057 |
| New Site | Land south of Newmarket Road | 285 |
| Total dwellings 2011-2031 (incl. New Sites) | | 1342 |

Education requirement:

Total dwellings 2011-2031

2.1FE

Total dwellings 2011-2031 (incl. New Sites)

2.7FE

An additional 285 dwellings are proposed for Royston. Additional school places would be required. The primary population in Royston is increasing and, to ensure sufficient local places, the county council is considering proposals for an additional 1FE of permanent capacity within the First Schools in the town. All primary schools are currently full and feasibility work suggests that beyond this current permanent expansion phase, there is no further expansion capacity available within the schools. It would therefore be prudent to allocate a new 2FE First School site to ensure the future population and yield arising from the new housing can access a local school place.

St Ippolyts

| Ref | Site | Dwellings |
|--|-------------------------------|-----------|
| SI1 | Land south of Waterdell Lane | 72 |
| SI2 | Land south of, Stevenage Road | 24 |
| Total dwellings 2011-2031 | | 96 |
| New Site | Land east of London Road | 37 |
| Total dwellings 2011-2031 (incl. New Sites) | | 133 |

Education requirement:

Total dwellings 2011-2031

0.2FE

Total dwellings 2011-2031 (incl. New Sites)

0.3FE

The addition of the new site (37 dwellings) increases the requirement by 0.1FE to 0.3FE. Current analysis indicates that there are sufficient places to meet the local population, however an increase of dwellings in the village may impact upon this and the additional yield may be difficult to accommodate at this school. St Ippolyts C of E (Aided) Primary has a PAN of 20 and would likely require additional classrooms to take the school up to 1FE. Further feasibility required to establish the expansion options in this area.

St Paul's Walden

| Ref | Site | Dwellings |
|--|---|-----------|
| SP1 | Land south of, High Street, Whitwell | 44 |
| Total dwellings 2011-2031 | | 44 |
| New Site | Land between Horn Hill and Bendish Lane, Whitwell | 119 |
| Total dwellings 2011-2031 (incl. New Sites) | | 163 |

Education requirement:

Total dwellings 2011-2031

0.01FE

Total dwellings 2011-2031 (incl. New Sites)

0.3FE

The addition of the new site (119 dwellings) increases the requirement to 0.3FE. Current analysis indicates that there are sufficient places to meet the local population, however an increase of dwellings in the village may impact upon this and the additional yield may be difficult to accommodate at this school. Further feasibility required to establish the expansion options in this area.

Weston

| Ref | Site | Dwellings |
|--|---------------------------------|-----------|
| WE1 | Land off Hitchin Road | 25 |
| Total dwellings 2011-2031 | | 25 |
| New Site | Land off Hitchin Road | 16 |
| New Site | Rear of Town Farm, Hitchin Road | 37 |
| Total dwellings 2011-2031 (incl. New Sites) | | 78 |

Education requirement:

Total dwellings 2011-2031

0.05FE

Total dwellings 2011-2031 (incl. New Sites)

0.2FE

The addition of the new sites (53 dwellings) increases the requirement to 0.2FE. Current analysis indicates that there are sufficient places to meet the local population, however an increase of dwellings in the village may impact upon this and the additional yield may be difficult to accommodate at this school. Further feasibility required to establish the expansion options in this area.

Areas with no additional new sites

Wymondley

| Ref | Site | Dwellings |
|----------------------------------|--------------------------------|------------------|
| WY1 | Land south of Little Wymondley | 300 |
| Total dwellings 2011-2031 | | 300 |

Education requirement:

Total dwellings 2011-2031

0.6FE

No additional sites are proposed for Wymondley and therefore our earlier comments remain. In February 2015 we stated that additional school places would be required. The existing village school is 0.5FE and has expansion potential to 1FE on its existing site; however expansion beyond this would require additional land or provision of a detached playing field.

Wymondley pupils in the main look to Hitchin for their secondary schooling. With rising demand for secondary places in Hitchin, although some expansion of the existing secondary schools is considered feasible, capacity is limited and we would therefore seek appropriate planning policies, as indicated previously, to support the physical expansion of school sites to accommodate local demand.

Therfield

| Ref | Site | Dwellings |
|----------------------------------|------------------------------|-----------|
| TH1 | Land west of Police Row | 26 |
| TH2 | Land south of, Kelshall Road | 12 |
| Total dwellings 2011-2031 | | 41 |

Education requirement:

Total dwellings 2011-2031

0.07FE

No additional sites are proposed for Therfield and therefore our earlier comments remain, in that funding sought to ensure the local education infrastructure can accommodate the additional demand.

Pirton

| Ref | Site | Dwellings |
|----------------------------------|---------------------------|------------------|
| PT1 | Land east of, Priors Hill | 88 |
| PT2 | Holwell Turn, West Lane | 47 |
| Total dwellings 2011-2031 | | 135 |

Education requirement:

Total dwellings 2011-2031

0.3FE

No further sites are proposed within Pirton and therefore the comments from February 2015 remain. Current analysis indicates that there are sufficient places to meet the local population, however an increase of dwellings in the village may impact upon this and the additional yield may be difficult to accommodate at this school. Further feasibility required to establish the expansion options in this area.

Preston

| Ref | Site | Dwellings |
|----------------------------------|------------------------|------------------|
| PR1 | Land off Templars Lane | 20 |
| Total dwellings 2011-2031 | | 20 |

Education requirement:

Total dwellings 2011-2031

0.04FE

No further sites are proposed within Preston and therefore the comments from February 2015 remain. Funding sought to ensure the local education infrastructure can accommodate the additional demand.

Reed

| Ref | Site | Dwellings |
|----------------------------------|---------------------------|------------------|
| RD1 | Land at, Blacksmiths Lane | 21 |
| RD2 | Farmyard, Brickyard Lane | 10 |
| Total dwellings 2011-2031 | | 31 |

Education requirement:

Total dwellings 2011-2031

0.06FE

No further sites are proposed within Reed and therefore the comments from February 2015 remain. Funding sought to ensure the local education infrastructure can accommodate the additional demand.

Barkway

| Ref | Site | Dwellings |
|----------------------------------|-------------------------------|-----------|
| BK1 | Land east of, Cambridge Road | 13 |
| BK2 | Land North of, Windmill Close | 18 |
| Total dwellings 2011-2031 | | 31 |

Education requirement:

Total dwellings 2011-2031

0.06FE

There are no additional sites proposed with Barkway. In our earlier response we noted that the existing school site is quite constrained and is considered difficult to expand should it ever be required to do so. Although the scale of new housing is minimal, it would be prudent that the reserve site allocation in the current Local Plan is carried forward into the new Local Plan.

Kimpton

| Ref | Site | Dwellings |
|----------------------------------|----------------------------|-----------|
| KM1 | Land at, Hall Lane | 53 |
| KM2 | Land off Lloyd Way | 30 |
| KM3 | Land north of, High Street | 13 |
| Total dwellings 2011-2031 | | 96 |

Education requirement:

Total dwellings 2011-2031

0.2FE

No additional sites are proposed with Kimpton. The comments submitted in February 2015 remain, in that, current analysis indicates that there are sufficient places to meet the local population, however an increase of dwellings in the village may impact upon this and the additional yield may be difficult to accommodate at this school. Further feasibility required to establish the expansion options in this area.

Offley

| Ref | Site | Dwellings |
|--|-------------------------------|-----------|
| OF1 | Allotment Gardens, Luton Road | 62 |
| Total dwellings 2011-2031 (incl. New Sites) | | 62 |

Education requirement:

Total dwellings 2011-2031

0.1FE

Our earlier response noted that funding would be required to ensure the local education infrastructure can accommodate the additional demand.

East of Luton

| Ref | Site | Dwellings |
|----------------------------------|--------------------------|-------------|
| EL1&EL2 | East of Luton | 1400 |
| EL3 | Land north east of Luton | 700 |
| Total dwellings 2011-2031 | | 2100 |

Education requirement:

Total dwellings 2011-2031

4.2FE (HCC)

6.9FE (Luton 305 dwellings = 1FE)

Our comments in response to the 2,100 dwellings within the Cockernhoe and East of Luton market area was as follows:

The nearest Hertfordshire secondary schools to this proposed development are in Hitchin, approximately 6 miles from the site. This site falls mainly within the Hitchin priority area for admissions purposes. The secondary schools in Hitchin are all full at year of admission and current forecasts indicate a need for additional places to meet rising demand from the existing community.

There are closer secondary schools in Luton. However, Luton Borough Council is also experiencing increased demand for secondary provision across their area and there is therefore no existing surplus capacity available in Luton schools to accommodate the yield from this development.

In light of this, the County Council requests this development is master-planned with the Crown Estates land to bring forward a sustainable development capable of delivering new primary and secondary schooling for those new local communities.

It would be prudent to seek 4FE of new primary school provision and a new secondary school site within the heart of the new larger development to serve the needs of the development as a whole.

Reserved site for future needs - West of the A1(M) at Stevenage

| Ref | Site | Dwellings |
|----------------------------------|----------------------------|------------------|
| WS1 | West of AL(M) at Stevenage | 3100 |
| Total dwellings 2011-2031 | | 3100 |

Education requirement:

Total dwellings 2011-2031

6.2FE

Our comments in response to the 3,100 dwellings reserve site remain. We stated that 6FE of primary provision within this development was required, (3 x 2FE new primary schools);

Graveley (Village)

| Ref | Site | Dwellings |
|----------------------------------|----------------------|-----------|
| GR1 | Land at Milksey Lane | 8 |
| Total dwellings 2011-2031 | | 8 |

Education requirement:

Total dwellings 2011-2031

0.01FE

At 8 dwellings no additional infrastructure was to be sought. The additional sites are closer to Stevenage than the village of Graveley. The nearest primary school is The Leys Primary and Nursery School which is being considered for PEP5. The additional site creates a requirement for 1FE. Three additional sites have been proposed for the Parish of Gravley however these have been included as part of North Stevenage.

Appendix One – Educational Context

1.0 Introduction

- 1.1 To assist with interpreting the information provided, the background to the current situation regarding school places within the District, together with a definition of the terms used throughout this document, is given below.

Role of the County Council

- 1.2 Hertfordshire County Council (HCC) is the local education authority and is subject to a number of statutory duties and responsibilities including:
- Promoting high standards of education
 - Planning and commissioning school places in its local authority area
 - Extending diversity and choice
 - Co-ordinating admissions for all maintained schools
 - Co-ordinating admissions for Academies and Free Schools – where requested to do so
 - Resourcing the shared maintenance, improvement to, and provision of, the built school environment, and securing value for money.
- 1.3 In coming to a view about the most appropriate strategy in response to development growth proposals, HCC is looking for a solution which takes into account each of these elements.

School Planning Context

- 1.4 HCC has a duty to secure sufficient school places in its area, ensuring that every child has access to a school place. HCC fulfils these planning responsibilities by forecasting the demand for school places in order to identify an appropriate balance between supply and demand. It negotiates the right number of places on an annual basis, whilst in parallel undertaking longer term strategic planning.

Rising Demand

- 1.5 Hertfordshire has experienced a significant rise in the demand for primary places across the County in recent years in line with the picture nationally. The rise is not consistent across the county, with some areas experiencing substantial increases in the primary aged population, whilst in some more rural areas demand is less pressing or currently remains fairly static. More information on the rising demand is available through HCC's strategy document '*Meeting the Rising Demand for School Places*', available at <http://www.hertsdirect.org/services/edlearn/aboutstatesch/planning/>

Forecasts

- 1.6 HCC produces pupil forecasts every six months for both Reception and Year 7 demand. At a primary level, HCC forecast 5 years ahead and secondary forecasts stretch to 10 years in the future.
- 1.7 These forecasts are based on actual date of 0-5 year olds in an area, historic pupil movement as well as an assumed pupil yield from new housing developments. The forecasts have taken account of an assumed housing growth trajectory for the longer term, as provided by Hertfordshire's District and Borough Councils.
- 1.8 Latest forecasts are provided within the body of this response. These project demand for admissions into Reception and Year 7 and do not include any margin. HCC would normally plan a surplus of 5 to 10% across an area to allow for fluctuations in forecast demand.
- 1.9 Further information on the methodology around the pupil forecasts can be found at <http://www.hertsdirect.org/services/edlearn/aboutstatesch/planning/>.

New Schools

- 1.10 The way in which new schools are set up has undergone significant change in recent years. The County Council's role as a commissioner of places is such that where it considered there is a basic need for a new school it must:
- Seek proposals to establish an academy/free school; or (if unsuccessful)
 - Hold a statutory competition; or (if unsuccessful)
 - Publish its own proposals for a new maintained school
- 1.11 The County Council remains responsible for providing the site and meeting all associated capital and pre/post-opening costs, in instances where the new school provision is meeting basic need. Therefore, the County Council continues to hold the key role in negotiating S106 contributions for, and the provision of, all school infrastructure.

Principles

Forms of Entry

- 1.12 School provision is often described in terms of 'forms of entry'. 1 form of entry (f.e.) equals 30 places per year group.
- 1.13 Primary schools have seven year groups from Reception through to Year 6. HCC has a preference for primary schools of 2 f.e. or more, as this larger size provides improved opportunities for delivery of a broad education curriculum and staff development, as well as offering the ability to better manage fluctuations in demand. A 2fe primary school will have 7 year groups of 60 pupils (420 in total), plus a Nursery class where offered.
- 1.14 Secondary schools have five year groups, from Year 7 through to Year 11, and Sixth Forms with lower and upper year groups. HCC has a preference for secondary schools of 6 to 10f.e. as this offers improved opportunities for the delivery of a broad education curriculum. A 6fe school will have 5 year groups of 180 pupils (1080 in total) plus a Sixth Form.

Pupil Yield

- 1.15 When undertaking high level school place planning related to new residential development, HCC determines child yield based on a ratio of 1f.e. per 500 dwellings to be 97.5% confident of not underestimating yield.
- 1.16 This is based on a study of 49 Hertfordshire developments undertaken by HCC's demographer (c. 2008). This work produced a yield range of 1f.e. per 500 dwellings (42 children per 100 dwellings / 97.5% confidence) to 1f.e. per 850 dwellings (24.7 children per 100 dwellings/50% confidence).
- 1.17 This range is referred to throughout this document. The County Council applies the upper end of the range, 1f.e.per 500 dwellings, in the first instance to ensure prudent planning.
- 1.18 When considering actual proposals or planning applications, the County Council uses specific development forecasting models to ascertain more tailored demographic profiles, including pupil yields.

Developer Contributions

- 1.19 When planning for new education infrastructure arising through development growth, HCC works to a number of consistent principles:
- That developer contributions will fund the relevant school infrastructure requirements arising from housing growth, in conjunction with an assessment of local circumstances
 - That strategic housing sites will provide appropriate school infrastructure that is sufficient to meet the demand generated by the development, and that this should be through both the provision of school site(s) and the funding for school builds
 - That in general, any current capacity is there for the existing community and the normal fluctuations in demand – HCC will seek contributions of some form from all developments for the purpose of prudent planning.

Site Size

- 1.20 School site standards have recently changed (School Premises Regulations, 2012) and provide a much less stringent approach to school site standards. The County Council has previously agreed to continue using the site areas that refer to Building Bulletin 98 (secondary) and 99 (primary) guidance, as these are deemed a suitable standard for school premises. In light of the new BB103 guidance however, the County Council is in the process of reviewing its current position. Until this review is complete it will continue to refer to BB98/99.

Appendix 1z



Education / Planning meeting

Hertfordshire County Council (HCC) / North Hertfordshire District Council (NHDC) / Stevenage Borough Council (SBC)

12 February 2015

County Hall, Hertford

Dick Bowler (DB)

Alice Carrington (AC)

Bob Chapman (BC)

Karen Corkery (KC)

Kate Ma (KM)

Peter Oddy (PO)

Catherine Taylor (CT) – All HCC

Caroline Danby (CD)

Nigel Smith (NS) – both SBC

Chris Carter (CC)

David Hill (DH) – both NHDC

Note: fe = form of entry. 1fe = 30 pupils

- Introductions were made around the table.
- NS had circulated notes of previous meeting between SBC and HCC and a suggested agenda. No additional comments
- NS provided update on SBC plan. Confirmed versions will be taken to Executive in June (Housing nos / Green Belt) and October (Publication draft).
- SBC have commissioned HDH Planning and Aecom to conduct Whole Plan Viability Study, including reconsideration of CIL and identification of funding / delivery strategy for Infrastructure Delivery Plan.
- CC provided update on NHDC plan. 1,700 representations logged to date with a 'big pile' still left. Officers will report to Members after the elections.
- It was agreed to address the matters arising from the last meeting as they came up on the relevant agenda items.

Demographic basis for forecasts

- NS set out SBC's position regarding the demographic forecasting used to define future requirements:
 - 1:500 standard ratio (along with existing schemes that have been implemented) results in request for approx. 3,000 additional primary school places in the Borough over the plan period 2011-2031.
 - This compares to requirement for approx. 2,000 places if historic HCC unit-size yields (acknowledging these are considered outdated) while 2012-based population projections suggest 1,500 additional primary school children over same period.
 - Current calculations effectively assume:
 - i. Peak demand from all new sites occurs simultaneously rather than phased over time; and
 - ii. Demand from within existing town remains at current levels across plan period
- KM confirmed that the 1:500 yield is a standard response to Local Plan consultations that is used on a countywide basis. It is based on a study of yields from a range of sample schemes across the County.
- This work is currently being updated – HCC are pulling together updated yields and other historic information to determine if existing forecast systems need updating.

- There is a strong impetus to complete this work, particularly arising from local plans in the east of the County.
- BC confirmed that the current approach provides a consistent basis for Local Plan reps. The work referred to by KM was not far from completion and HCC had hoped to have it available for the meeting.
- NS confirmed that it need not be a huge issue for the Local Plan as policies could be worded appropriately but SBC were also moving toward more detailed (pre-app) discussions with some sites where greater certainty would be required.
- KM noted that, for primary schools, it is only possible to forecast to a four-year horizon using actual children and HCC need to look at methods for longer term forecasts.
- DB noted that the *Building Schools for the Future* programme had required a 10-year forecast and the DfE had accepted HCCs approach

North of Stevenage

- BC confirmed that HCCs representations to NHDC Local Plan had maintained stance of need for 2x2fe schools to serve the two 'halves' of the development in SBC and NHDC respectively, but were open to negotiation on this matter.
- NS reiterated concerns raised at previous meeting regards viability, loss of housing numbers etc.

North-east Stevenage

- CC acknowledged the representations provided by HCC to the NHDC plan requesting the use of this site for education but considered a supplementary paper was required to help inform a decision.
- This should set out, in more detail, the justification for an education use, details of any site search or sequential testing, proposed delivery mechanisms etc.
- In response to a query from KM, CC requested this be provided in the next month so it could be reported as part of the feedback from the recent Local Plan consultation.
- DB queried whether any further progress had been made on the land ownership / availability issue. CC confirmed NHDC are in ongoing talks with the landowner.
- DB questioned whether both homes and education uses could be provided.
- CC confirmed it was a case of one or the other. Providing both would trigger the need for a Northern Relief Road.
- DB questioned how this site might be taken forward. A school would be unaffordable at residential land values. Any attempt to CPO could likely trigger an application for a Section 17 Certificate (Alternative Appropriate Development) from the landowner.
- KM to consider these issues in supplementary paper, NHDC to give consideration to this and most appropriate course of action in response.

West of Stevenage

- No new issues were identified.

Knebworth / Codicote

- HCC response to NHDC local plan had reconfirmed issues previously identified.
- *As all sites in which NHDC had an interest had been discussed, CC & DH left the meeting at this point*

South-east Stevenage

- KM identified that, in absence of on-site provision, nearest school for some would be Datchworth while schools in Stevenage approx. 2km from the site.

- NS questioned whether HCC had any adopted standards for distance to school. KM made reference to indicators in the LTP but confirmed these weren't standards.
- SBC reiterated position at previous meeting, whereby removing land for school provision brings housing numbers well below threshold for on-site provision.
- Acknowledge distance is an issue but, viewed town-wide, this site would be an exception.
- KC confirmed HCC remain 'uncomfortable' with concept of using existing schools.
- CT referred to use of Mosaic and other administrative data and that more information on this would be available at the end of March.

Town Centre

- BC confirmed there was not an 'in principle' objection to the concept of an urban school to serve the town centre. The Leisure Park remained the preferred location to secure additional provision and that HCC's own landholdings in the town centre were too small to accommodate a school.
- KC showed indicative plans demonstrating a school could be accommodated on 0.4-0.5ha if using a MUGA, no grass and 22 on-site parking spaces (half the normal amount). However, no part of the Leisure Park would be within 400m of an off-site playing field.
- NS questioned whether the 400m requirement was statutory. KC confirmed not and that a site of approx. 0.7ha would be required to accommodate a pitch onsite (with no parking).
- DB queried the option of providing play areas on the roof.
- CT reiterated a point made at the last meeting, questioning how a compact / urban school might fit with the aspirations of those seeking to move to a regenerated town centre.
- KM clarified that the plans were solely from an estates perspective and School Effectiveness Team would need to be consulted.
- CT queried the timescales and unit mix for development in the town centre.
- CD confirmed that schemes at Six Hills House and Brickdale house were proceeding based on Prior Approvals. The current application on the Matalan site was currently considered unlikely to proceed. The Leisure Park was seeking to re-provide leisure facilities first and homes later.
- NS queried how school places arising from Prior Approval schemes, which are exempted from Section 106 contributions, would be funded.
- KM confirmed that Basic Need Grant is the only funding stream for new places available other than s106. There can be short-term grant programmes.

Key outcomes / actions

- **HCC to finalise review of yields and forecasting methods and notify NHDC / SBC once complete;**
- **HCC to provide supplementary representations to NHDC to inform future consideration of land to the north-east of Stevenage by mid March;**
- **Most appropriate and deliverable solution for south-east Stevenage to be considered further;**
- **SBC to provide HCC with further information on proposed unit sizes / phasing of town centre schemes, including details of those which are Prior Approvals.**

Appendix 1ai



By e-mail

Hertfordshire County Council
County Hall
Hertford SG13 8DE

Tel: 01992 588116
Email: bob.chapman@hertfordshire.gov.uk
Contact: Bob Chapman

Date 6 February 2015

Dear Ms Skeels

**NORTH HERTFORDSHIRE DISTRICT COUNCIL – LOCAL PLAN PREFERRED OPTIONS
2011-2031**

Thank you for your letter dated 16 December 2014 consulting Hertfordshire County Council on the above document;

This response is made by Hertfordshire Property as landowner and on behalf of Children's Services, Health and Community Services, Youth, Fire and Rescue Services, Gypsy Section and also on behalf of the Waste Disposal Authority (the infrastructure requirements for Early Years and Childcare are to follow).

We continue to positively welcome the ongoing opportunity being provided to engage in discussions with the Local Planning Authority (LPA) to identify the implications, where possible, for the services and service delivery. In this response we have sought to identify how the proposed housing growth level and location of new housing within North Hertfordshire could impact upon service requirements and the need for additional sites from a spatial planning perspective.

These representations should be read in conjunction with the HCC representations dated August 2013 submitted in response to your previous Local Plan consultation regarding housing growth levels and directions (enclosed).

In this response I have followed the format of the Preferred Options document so I first deal with the relevant policies and then the individual communities. For the latter, I have set out HCC's infrastructure requirements and, where appropriate, I comment upon certain site allocations that HCC has a particular interest in. I have also provided copies of certain documents that are referred to in this response (see list of enclosures on last page).

Polices

Policy CGB1: Green Belt

The County Council supports the amendment of the Green belt boundary on the northern side of Hitchin as this excludes the Priory secondary school site from the Green Belt and

thereby facilitates its future expansion, which is likely to be required as a result of planned housing growth.

Policy HDS1: Housing Targets 2011-2031

The policy indicates that over the plan period sufficient land will be released for development to enable the delivery of at least 14,200. Of this number 12,100 dwellings are to meet North Hertfordshire's own objectively assessed need and the remaining 2,100 dwellings are an allowance to contribute to the unmet need for housing arising from Luton. We note that in the event of an unmet need from Stevenage, land west of the A1 (M) may be used for up to 3,100 dwellings but these are not counted as part of the 14,200 target.

The supporting text identifies three areas on the edge of Stevenage as having the capacity for significant urban extensions: West, North and North-East of the town. With regard to the North, it is noted that Stevenage's emerging plans include development immediately south of this site within the borough and that the supporting text says it would make sense for the whole area to be planned together. The County Council supports this approach and the masterplanning of this area, particularly having regard to the need for new schools to serve this development – HCC infrastructure needs are set out below.

With regard to the North–East, we note it is considered that there is “scope for a modest amount of development adjoining Great Ashby”, however, the land was previously the subject of planning permission for a new secondary school (the relocation of Thomas Alleyne School). Although that permission has now lapsed, we consider that it would be prudent to plan for future secondary needs given the combined level of development at North and North-East Stevenage – we evidence this need by reference to the planned housing growth for these areas (see response under Communities section below). Furthermore, although the former Collenswood Secondary school site within Stevenage is retained by the County Council to meet future needs, it is not best located to serve the community at the northern end of Stevenage. We would therefore request the allocation of land for an Education zone, which should be held in reserve pending the future demand for school places.

Policy HC2: Green space

Policy NE2: Green infrastructure

It would appear that development proposals on many school sites (playing fields) would fall to be considered against these policies. In the past few years the County Council has undertaken a programme of primary and secondary school expansions in order to meet the growing demand for school places; this programme of expansions is likely to continue. While the need to protect public and private green spaces is understood, this must be balanced against the need to provide additional school places, particularly as this need may arise directly from the planned housing growth. As such, it is considered that a flexible approach should be taken towards development proposals that may, of necessity, affect school sites including their playing fields. It would be helpful if the relevant policies could be couched in terms that are positive towards the provision of essential school development (including those school sites in the Green Belt).

Policy NE6: Reducing Flood Risk

The policy states that “Proposals within flood zone 1, over 1 hectare and all types

of development within flood zone 2 & 3 will need to submit a Flood Risk Assessment in accordance with the criteria in the NPPF.” It is not clear whether the requirement for a Flood Risk Assessment is triggered by a proposed development that is itself over 1ha in size or that the proposed development (which might itself be significantly less than 1ha in size) is on a site over 1ha. An example of the latter could be a small school extension of 200sqm in size but on a school site over 1ha. Clarification should be provided for the benefit of applicants.

Chapter 11 - Infrastructure and Delivery

Policy ID1: Infrastructure requirements and developer contribution

The commitment to co-ordinate the delivery of new infrastructure with development and to ensure that all development contributes appropriately to infrastructure requirements is supported. Hertfordshire County Council (HCC) encourages the continuation of co-operative working. Previous requirements outlined by HCC were based on an earlier version of the plan. In line with paragraph 11.5, we would seek to ensure that the Infrastructure Delivery Plan (IDP) is revised to indicate the more detailed infrastructure requirements now identified to support this version of the Local Plan.

As indicated in paragraph 11.10, we would welcome an update to the Planning Obligations Supplementary Planning Document (SPD) so that the Community Infrastructure Levy (CIL) Regulations 2010 (as amended) can be reflected in an appropriate format. Hertfordshire County Council is currently reviewing its own Toolkit in this respect. It should be noted that footnote 12 of Chapter 11 may require restructuring for clarity and references to a ‘Section 123 List’ should be amended to ‘Regulation 123 List’ to provide the most common terminology and avoid confusion.

It is suggested in paragraph 11.11 that North Hertfordshire District Council is considering the development of a CIL. We would seek to encourage the implementation of a CIL at the earliest opportunity. As stated in paragraph 11.18, the cumulative impact of many smaller sites can ‘create additional demands and burdens on existing infrastructure’. This must be addressed through developer contributions. From April 2015, the ability to pool s106 planning obligations is restricted and it will become increasingly difficult to fund projects which mitigate the impact of smaller developments. The implementation of a CIL is currently the most viable option of supporting the development of these sites.

While thoughts are still emerging, current thinking from a HCC service provision perspective is that developments of 500 + dwellings can best deliver infrastructure needs, including land, via Section 106 Agreements. Care must be taken to ensure that developments of 500 + are not sub-divided thereby frustrating the ability to address infrastructure requirements via future Section 106 Agreements. The Planning Obligations team in Development Services would be happy to assist further on these points as well as contributing to the dialogue around the update of the IDP, as set out above.

We would also welcome the opportunity to continue with our joint working to determine the most effective trajectory for development. This will ensure that our services are able to deliver supporting infrastructure in a timely and efficient manner. We would reiterate the need to review the IDP as outlined in paragraph 11.25 to ensure that it is able to reflect the most up to date information available. This will be an iterative process and HCC welcome the opportunity to work cooperatively in this regard.

HCC encourage the development of masterplans for strategic sites. This assists in delivering a transparent process whereby each stakeholder is aware of their roles and responsibilities. This is particularly important where there are cross boundary issues associated with sites bordering Luton and Stevenage, as emphasised in paragraph 11.27. It may also be necessary to consider how infrastructure contributions might be passed across administrative boundaries for cross boundary sites. For example, development north of Stevenage might reasonably be expected to make contributions towards service provision in Stevenage.

Policy ID2: Masterplans

Amongst other things, the policy indicates that “Masterplans will be supplementary planning documents, to be prepared in partnership between the Council and landowners, developers, other local authorities and service providers, and involving the community.” The County Council welcomes this cooperative approach and is happy to work closely with the LPA in the preparation of Masterplans, particularly those involving land owned by the County Council such as at Baldock (further comments under Policy ID2 that relate specifically to **Baldock** are given in the Communities section below).

Communities

Development for North Hertfordshire’s own Needs

Education

Hertfordshire County Council (HCC) is the local education authority and is subject to a number of statutory duties and responsibilities including:

- Promoting high standards of education
- Planning and commissioning sufficient school places in its local authority area
- Extending diversity and choice
- Co-ordinating admissions for all maintained schools
- Co-ordinating admissions for Academies and Free Schools – where requested to do so
- Resourcing the shared maintenance, improvement to, and provision of, the built school environment, and securing value for money.

In coming to a view about the most appropriate strategy in response to development growth proposals, HCC is looking for a solution which takes into account each of these elements.

HCC has a duty to secure sufficient school places in its area, ensuring that every child has access to a school place. HCC fulfils these planning responsibilities by forecasting the demand for school places in order to identify an appropriate balance between supply and demand. It negotiates the right number of places on an annual basis, whilst in parallel undertaking longer term strategic planning.

When undertaking high level school place planning related to new residential development, HCC determines child yield based on a ratio of 1f.e. per 500 dwellings to be 97.5% confident of not underestimating yield.

This is based on a study of 49 Hertfordshire developments undertaken by HCC's demographer (c. 2008). This work produced a yield range of 1f.e. per 500 dwellings (42 children per 100 dwellings / 97.5% confidence) to 1f.e. per 850 dwellings (24.7 children per 100 dwellings/50% confidence). Further information on this study can be provided if required.

This range is referred to throughout this document. The County Council applies the upper end of the range, 1f.e.per 500 dwellings, in the first instance to ensure prudent planning. When considering actual proposals or planning applications, the County Council uses specific development forecasting models to ascertain more tailored demographic profiles, including pupil yields.

When planning for new education infrastructure arising through development growth, HCC works to a number of consistent principles:

- That developer contributions will fund the relevant school infrastructure requirements arising from housing growth, in conjunction with an assessment of local circumstances
- That strategic housing sites will provide appropriate school infrastructure that is sufficient to meet the demand generated by the development, and that this should be through both the provision of school site(s) and the funding for school builds
- That in general, any current capacity is there for the existing community and the normal fluctuations in demand – HCC will seek contributions of some form from all developments for the purpose of prudent planning.

School site standards have recently changed (School Premises Regulations, 2012) and provide a much less stringent approach to school site standards. The County Council has previously agreed to continue using the site areas that refer to Building Bulletin 98 (secondary) and 99 (primary) guidance, as these are deemed a suitable standard for school premises. In light of the new BB103 guidance however, the County Council is in the process of reviewing its current position. We would welcome further dialogue with you on this.

The education and other infrastructure requirements set out below are based upon the amount of proposed new housing (excluding completions and permissions to April 2014).

Ashwell

Site AS1 - 33 dwellings

0.01 FE

Funding will be sought to ensure the local education infrastructure can accommodate the additional demand.

Baldock

Site BA1 - 2800 dwellings

3.3FE to 5.6FE

Sites BA2 - BA9 totalling 614 dwellings

0.7FE to 1FE

Considering development of this scale in totality, the education infrastructure requirements would include:

- A pattern of new primary school sites to accommodate up to 8FE of primary provision, suitably located within the development to serve the new communities north and south of the railway
- 1 x 7FE secondary school site to the north of the railway, which could include all through education provision

The exact configuration of the above education infrastructure is still to be finalised and will need to be included in any masterplan. Some expansion of Knights Templar School is possible and could be considered in this exercise. This means that the proposals for schools shown on the illustrative masterplan drawings already submitted as representations are indicative only.

In terms of **Policy ID2**, we note the allocation of site **BA1** for housing purposes and the requirement for the preparation of a masterplan. This site is wholly owned by HCC, as are sites **BA2, BA3 and BA4**. In order to confirm the deliverability of all these housing sites, HCC has commissioned certain “high level” reports on feasibility and financial viability. The viability work should be taken as a guide only at this stage as further work is required to confirm specific costs. For this reason and because the information is commercially sensitive, the report on financial viability excludes details of the cost of individual items of infrastructure. However, the major items such as the railway bridge crossing and roads are taken into account. The reports are as entitled below and are submitted as part of this representation.

Land North and South of Baldock – Feasibility Report, November 2014

Land North and South of Baldock – report dated 11 November 2014 on Viability

Barkway

Sites BA1 and BA2 totalling 31 dwellings

0.06FE

The existing school site is quite constrained and is considered difficult to expand should it ever be required to do so. Although the scale of new housing is minimal, it would be prudent that the reserve site allocation in the current Local Plan is carried forward into the new Local Plan.

Barley

No site allocations therefore no infrastructure requirements

Caldecote

No site allocations therefore no infrastructure requirements

Clothall

No site allocations therefore no infrastructure requirements

Codicote

Sites CD1, CD2 and CD3 - 179 dwellings

0.2FE to 0.4FE

Education infrastructure requirements:

- The existing 1FE school site is constrained and current forecasts indicate a shortage of places from the existing community without any additional housing development. Expansion of the existing primary school is likely to be required albeit there appear to be highway/site constraint issues. It is therefore requested that land adjoining the site is allocated to facilitate the expansion and potentially provide a new access to the site. To that end, if proposals for additional housing are taken forward on land adjoining the school, the County Council would expect the developer to provide the necessary additional school land/access as part of their scheme – a masterplanning approach would appear appropriate. A higher level of housing development would better support the scale of any enlargement of the school in educational terms.

Graveley

Site GR1 – 8 dwellings

0.01FE

No additional education infrastructure requirements

Great Ashby & North East of Stevenage

Site GA1 (formerly NES3) – 357 dwellings. Current planning application

0.4FE to 0.5FE

Infrastructure requirements:

- Additional school places required. This could be provided through expansion of an existing primary school within Stevenage Borough Council. Additional secondary capacity is also likely to be required in view of the combined level of development at sites GA1, GA2 and NS1 (see below).

Site GA2 – 500 dwellings

0.5FE to 0.6FE

Infrastructure requirements:

- Additional school places would be required. Stevenage has seen a significant rise in the primary population in recent years and the County Council has responded by permanently expanding existing provision by 3 forms of entry (690 primary places) in

the north of the town since 2011. There is limited further expansion capacity across the area and it would therefore be prudent to plan for an additional 2FE primary site in this local area. This could potentially be in the form of an all through school (2FE primary and + 6FE secondary) in light of the forecast increase in demand for secondary places arising from new housing and the population expansion in north Stevenage. The secondary school site granted planning permission April 2010 (albeit now lapsed) at Great Ashby should be designated as an education zone/allocation within the Local Plan to provide flexibility and ensure sufficient land is available to meet educational need.

- Bowes Lyon House Youth Centre in central Stevenage upgraded and extension to existing Great Ashby community centre to accommodate youth provision
- New and enlarged library as part of shared service development within town centre

Stevenage Borough Council is also proposing housing within their boundary to the north of the settlement. Any strategic housing site that spans both North Herts and Stevenage should be treated in a holistic manner in terms of infrastructure provision.

Hexton

No site allocations therefore no infrastructure requirements

Hinxworth

No site allocations therefore no infrastructure requirements

Hitchin

Sites HT1 – HT9 totalling 770 dwellings

0.9FE to 1.5FE

Infrastructure Requirements:

- Additional school places would be required. Prudent planning would suggest the identification of a new 2fe primary school site to ensure sufficient provision to meet demand
- Bearton Green is a reserve school site in the current Local Plan and it would be prudent that the reserve site allocation is carried forward into the new Local Plan as this would provide flexibility in that is needed, the land could be used to facilitate expansion of an existing school by providing detached playing fields.
- Some expansion of the existing secondary schools is considered feasible although capacity is limited and we would therefore seek appropriate planning policies, as indicated previously, to support the physical expansion of school sites to accommodate local demand. In this respect, removal of the Priory School from the Green Belt would be welcomed.
- Youth provision within new community centre;
- Improvements to Hitchin library;
- The Hitchin and West of Stevenage proposals could stretch the existing arrangements at Hitchin Fire Station which is currently Day Crewed. This may mean that this fire station may have to become a day crewing plus fire station which would increase the wholetime firefighter headcount by 2 personnel and also require some capital investment at the fire station itself.

Holwell

No site allocations therefore no education infrastructure requirements

Ickleford

Sites IC1 and IC2 – 57 dwellings

0.1FE

Funding will be sought to ensure the local education infrastructure can accommodate the additional demand.

Land at Bedford Road

I attach a plan (ref.HP 2182/A) of land owned by HCC at Bedford Road, Ickleford that could be made available for residential development 2021-2026. Both the red and blue shaded areas could be developed for housing if required.

Kelshall

No site allocations therefore no infrastructure requirements

Kimpton

Sites KM1, KM2 and KM3 - 96 dwellings

0.1FE to 0.2FE

Current analysis indicates that there are sufficient places to meet the local population, however an increase of dwellings in the village may impact upon this and the additional yield may be difficult to accommodate at this school. Further feasibility required to establish the expansion options in this area.

King's Walden

Site KW1 – 16 dwellings

0.03FE

Funding will be sought to ensure the local education infrastructure can accommodate the additional demand.

Knebworth

Sites KB1 and KB2 – 411 dwellings

0.5FE to 0.8FE

Infrastructure Requirements:

- Additional school places would be required. To be provided through provision of a new 1 FE primary school site. It would be preferable if both of the above sites could

be phased to come forward together to support the delivery of additional primary places.

- The closest secondary schools to Knebworth are in south Stevenage. Long term proposed housing development and population growth suggests insufficient capacity within the existing secondary schools in Stevenage to accommodate future forecast demand. Therefore, as indicated above, it would be prudent to reserve a secondary school site at Great Ashby & NE Stevenage to plan for future population pressures.
- Youth facility within a new or extended community hall

Langley

No site allocations therefore no infrastructure requirement

Letchworth Garden City

Site LG1 – 1000 dwellings on site to be masterplanned.

1.1FE to 2FE

Infrastructure Requirements:

- Additional school places would be required. To be provided through provision of a new 2FE primary school site as part of a masterplan for this area.
- Feasibility work is required to establish if the existing secondary schools have sufficient expansion potential to meet the demand from the scale of development.
- Youth provision within new community centre;
- Improvements to Letchworth library

Sites LG2 - LG11 totalling 537 dwellings

0.6FE to 1FE

Infrastructure Requirements:

- Additional school places would be required. To be provided through expansion of existing schools (financial contributions required), however, it would be prudent if the reserve school site allocation at Southern Way, which is on the proposals map of the current local plan, is carried forward into the new local plan and excluded from the Green Belt.

Site LG6 – Land off Radburn Way

We note that this is an allocated housing site (27 dwelling estimate). The site of Freeman House is owned by HCC and directly adjoins Site LG6 (see enclosed location plan). Freeman House and Minsden House, Hitchin are Elderly Persons Homes (EPHs) that are functionally obsolete in terms of the accommodation and facilities they provide for elderly people. Quantum Care Limited (as operator of the Homes) and the County Council are in partnership therefore building a new EPH on part of the Former Lannock School Site, Whiteway, Letchworth in order to re-provide accommodation for the elderly people from these two EPHs. As such, the County Council considers that the site of Freeman House is available and suitable for residential development.

The vehicular access to site LG6 appears to be very limited and this is confirmed by an Access Feasibility study (enclosed) that has been commissioned by HCC. The report

concludes that the most feasible option for gaining access to the site is via Freeman House, which has an existing access on Radburn Way. In view of this, we suggest that the housing allocation on site LG6 is extended to include the Freeman House site.

Lilley

No site allocations therefore no infrastructure requirements

Newnham

No site allocations therefore no infrastructure requirements

Nuthampstead

No site allocations therefore no infrastructure requirements

Offley

Site OF1 – 62 dwellings

0.1FE

Funding sought to ensure the local education infrastructure can accommodate the additional demand.

Pirton

Sites PT1 and PT2 – 135 dwellings

0.3FE

Current analysis indicates that there are sufficient places to meet the local population, however an increase of dwellings in the village may impact upon this and the additional yield may be difficult to accommodate at this school. Further feasibility required to establish the expansion options in this area.

Preston

Site PR1 – 20 dwellings

0.04FE

Funding sought to ensure the local education infrastructure can accommodate the additional demand.

Radwell

No site allocations therefore no infrastructure requirements

Reed

Sites RD1 and RD2 – 31 dwellings

0.06FE

Funding sought to ensure the local education infrastructure can accommodate the additional demand.

Royston

Sites RY1-RY8 totalling 973 dwellings

1.1FE to 2.0FE

Infrastructure Requirements:

- Additional school places would be required. The primary population in Royston is increasing and, to ensure sufficient local places, the county council is considering proposals for an additional 1FE of permanent capacity within the First Schools in the town. All primary schools are currently full and feasibility work suggests that beyond this current permanent expansion phase, there is no further expansion capacity available within the schools. It would therefore be prudent to allocate a new 2FE First School site to ensure the future population and yield arising from the new housing can access a local school place.
- It is also worth noting that in the Preferred options document on page 72, paragraph 11.6, second bullet point, reference is made to school places and Royston being an exception in terms of capacity or reaching capacity, however, this is no longer the case and this should be removed.
- The proposals for Royston may mean that the existing crewing arrangements may need to be changed from a day crewing model to a day crewing plus operating model which would add 4 additional firefighter posts to that location and also lead to some additional capital investment at the Fire Station at Royston. This is added to by the need to provide operational cover to parts of South Cambridgeshire.

Rushden

No site allocations therefore no infrastructure requirements

Sandon

No site allocations therefore no infrastructure requirements

St Ippolyts

Sites SI1 and SI2 – 96 dwellings

0.2FE

Current analysis indicates that there are sufficient places to meet the local population, however an increase of dwellings in the village may impact upon this and the additional yield may be difficult to accommodate at this school. Further feasibility required to establish the expansion options in this area.

St Paul's Walden

Site SP1 – 44 dwellings

0.01FE

Current analysis indicates that there are sufficient places to meet the local population, however an increase of dwellings in the village may impact upon this and the additional yield may be difficult to accommodate at this school. Further feasibility required to establish the expansion options in this area.

Stevenage North

Site NS1 - 1000 dwellings. The site will be delivered jointly through a masterplan to be prepared with Stevenage Borough Council, which controls the adjoining land to the south.

1.1FE to 2FE (plus FE requirement from housing on adjoining land in SBC – not currently known)

Site NS1 - 1000 dwellings. The site will be delivered jointly through a masterplan to be prepared with Stevenage Borough Council, which controls the adjoining land to the south.

1.1FE to 2FE (plus FE requirement from housing on adjoining land in SBC – not currently known)

Infrastructure Requirements:

- 1 x 2FE primary school (**Site NS1**) + 1 x 1FE primary school (**SBC adjoining land**) with 1FE reserve expansion capacity. It is assumed that a lower level of development may come forward on land in SBC and hence 1FE primary school is required but on a site with a 1FE reserve capacity.
- New secondary school at Great Ashby – site of secondary school granted planning permission April 2010 should be designated as an education zone/allocation within the Local Plan to provide flexibility and ensure sufficient land is available to meet educational need.
- Bowes Lion House Youth Centre in central Stevenage upgraded and youth provision within new community centre x 1;
- New and enlarged library as part of shared service development within town centre.

Therfield

Sites TH1 and TH2 – 38 dwellings

0.07FE

Funding sought to ensure the local education infrastructure can accommodate the additional demand.

Wallington

No site allocations therefore no infrastructure requirements

Weston

Site WE1 – 25 dwellings

0.05FE

Funding sought to ensure the local education infrastructure can accommodate the additional demand.

Wymondly

Site WY1 – 300 dwellings

0.3FE to 0.6FE

Infrastructure Requirements:

- Additional school places would be required. The existing village school is 0.5FE and has expansion potential to 1FE on its existing site; however expansion beyond this would require additional land or provision of a detached playing field.
- Wymondley pupils in the main look to Hitchin for their secondary schooling. With rising demand for secondary places in Hitchin, although some expansion of the existing secondary schools is considered feasible, capacity is limited and we would therefore seek appropriate planning policies, as indicated previously, to support the physical expansion of school sites to accommodate local demand.

Development for wider needs of Luton housing market area

Cockernhoe & East of Luton

Sites EL1, EL2 and EL3 – 2,100 dwellings

2.5FE to 4.2FE (Hertfordshire County Council child yield rate of 1FE per 850 to 500 dwellings)

6.9FE (Luton Borough Council child yield rate of 1FE per 305 dwellings)

Infrastructure Requirements:

- The nearest Hertfordshire secondary schools to this proposed development are in Hitchin, approximately 6 miles from the site. This site falls mainly within the Hitchin priority area for admissions purposes. The secondary schools in Hitchin are all full at year of admission and current forecasts indicate a need for additional places to meet rising demand from the existing community.
- There are closer secondary schools in Luton. However, Luton Borough Council is also experiencing increased demand for secondary provision across their area and there is therefore no existing surplus capacity available in Luton schools to accommodate the yield from this development.
- In light of this, the County Council requests this development is master-planned with the Crown Estates land to bring forward a sustainable development capable of delivering new primary and secondary schooling for those new local communities.
- It would be prudent to seek 4FE of new primary school provision and a new secondary school site within the heart of the new larger development to serve the needs of the development as a whole.
- Youth provision within new community centre
- Improvements to existing Library or mobile library service (TBC with Luton Borough Council)

Reserved site for future needs

West of the A1(M) at Stevenage

Site WS1 – 3100 dwellings in reserve
3.6FE to 6.2FE

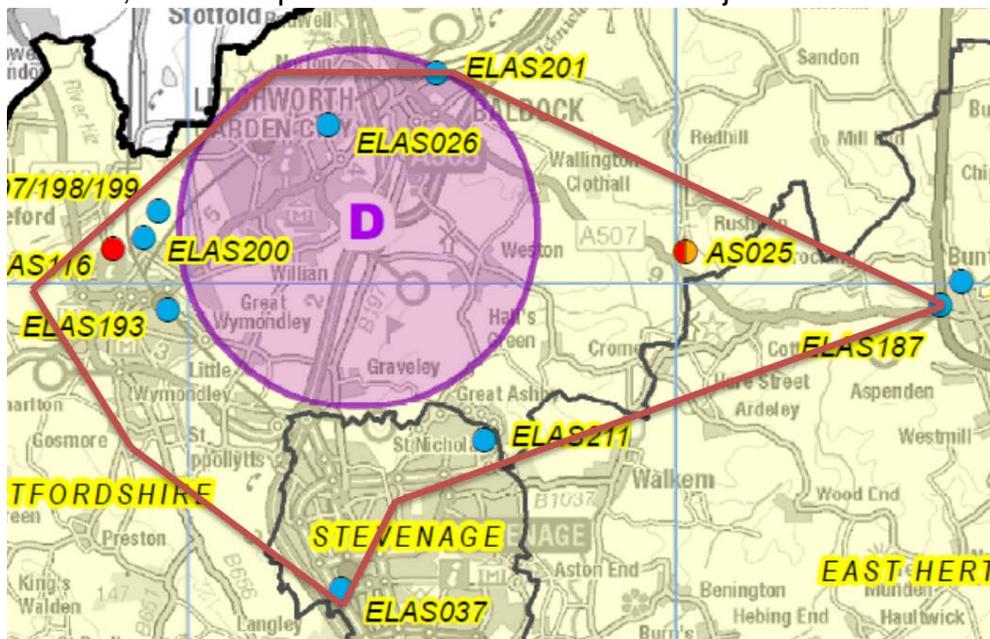
Infrastructure Requirements:

- 6fe of primary provision within this development, (3 x 2FE new primary schools);
- New secondary school;
- Bowes Lion House Youth Centre in central Stevenage upgraded and youth provision within new community centres x 2;
- 2 Children’s Centres;
- New and enlarged library as part of shared service development within town centre.

WASTE DISPOSAL AUTHORITY (WDA) ISSUES

Waste Management Unit Response to the North Hertfordshire Local Plan Consultation

The Waste Disposal Authority (WDA) requires strategically located facilities for the management of Local Authority Collected Waste (LACW) close to the primary road network in order to improve the effective management of waste arising in the north of the county. In addition to Area of Search ‘D’ identified in the Waste Core Strategy, the area outlined in red, as illustrated below, is considered to be the potential area for the development of new facilities, with the optimum location defined as the junction of the A1 / A505.



A waste transfer facility of approximately 1.25 hectares is required to serve the North Hertfordshire towns of Hitchin, Letchworth, Baldock and Royston as well as northern

Stevenage. This facility will act as a transfer facility for residual waste from households and a bulking facility for recyclable materials.

A purpose built Household Waste Recycling Facility (HWRC) is required to serve the catchments of Letchworth, Stevenage and Hitchin including anticipated increases in households in these areas. The HWRC needs to be located close to waste arisings in order to make their use a realistic option for householders.

The Waste Collection Authority (WCA) potentially require a depot of approximately 2 hectares for their collection fleet and co-located with their disposal point in order to support the development of more efficient collection rounds.

The co-location of the facilities identified above would provide a more efficient waste infrastructure, provide numerous benefits and result in significant savings for both the WDA and WCA. It is estimated that the co-location of a transfer facility, HWRC and WCA depot would approximately require a 5 hectare site.

The Waste Management Unit will shortly carry out feasibility work to review sites. The output of this work is likely to be presented at a later stage in the local plan process (and later in any review of the Waste Local Plan) and, if necessary, this may in time require the removal of sites from the Green Belt.

We would welcome further dialogue on any of the above matters.

Yours sincerely

Bob Chapman

Senior Planning Officer,
Hertfordshire Property

Enclosures

- Land North and South of Baldock – Feasibility Report, November 2014
- Land North and South of Baldock – report dated 11 November 2014 on Viability
- Access Feasibility Note prepared by Vectos (dated 8th January 2015) for Land to the rear of Freeman House, Letchworth Garden City
- Location plan - Freeman House (ref. EM 7502)
- Location plan - Land at Ickleford Road Bedford (ref.HP 2182/A)
- Housing Growth Consultation response to NHDC, August 2013

Appendix 1bi



Education / Planning meeting

Hertfordshire County Council (HCC) / North Hertfordshire District Council (NHDC) /
Stevenage Borough Council (SBC)

28 November 2014

County Hall, Hertford

Dick Bowler (DB)
Alice Carrington (AC)
Bob Chapman (BC)
Karen Corkery (KC)
Peter Oddy (PO)
Catherine Taylor (CT) – All HCC
Caroline Danby (CD)
Nigel Smith (NS) – both SBC
Chris Carter (CC)
David Hill (DH) – both NHDC

Note: fe = form of entry. 1fe = 30 pupils

- Introductions were made around the table.
- NS had circulated notes of previous meeting between SBC and HCC and a suggested agenda. No additional comments
- CC provided update on NHDC plan. Had been voted through by Council the previous evening and consultation on a 'preferred options' plan was to take place, beginning December 2013.
- NS provided update on SBC plan. Aiming for 'publication' version in Autumn 2015. To be preceded by focussed consultation on revised housing numbers in Summer 2015.
- Publication version will be full draft with policies, allocations and details of infrastructure. Gives just under 12 months to resolve relevant issues.
- BC had circulated initial list of HCC requirements prior to the meeting.
- NS had circulated initial comments and alternate proposal to aid discussion
- Agreed to discuss sites / areas in turn

North-east Stevenage

- DB provided summary recap of (aborted) proposals to relocate Thomas Alleyne Secondary School to this site under *Building Schools for the Future* programme.
- BC identified significant need for secondary school places remain in this area
- CC explained this site is identified for housing in NHDC preferred options plan. Requirement for secondary school was acknowledged but explained NHDC not in a position to take out the housing allocation at present.
- CC advised that, if HCC were to make a strong case for the use of this site as a secondary school, then NHDC would reconsider but emphasised the need for evidence.
- DB noted that the Weston Settlement [part land owners] were "implacably opposed" to the CPO which was being pursued for the Thomas Alleyne relocation scheme.
- CC / DH aware of landowner issues and anticipated receiving representations from Edward Keymer (EK) [Agent for this site].

- DB questioned whether there would be merit in HCC approaching EK prior to submitting representations. CC advised HCC were free to do this if they felt appropriate.
- CC noted that it was not possible to provide housing and secondary school due to limits on development from a single access. Additional development would overstep tipping point that requires new Northern Relief Road link from Junction 8 of the A1(M).
- CC questioned HCC role in provision of new schools in relation to expectation that new schools will be Academies or Free Schools.
- DB agreed to circulate "standard essay" on this subject. Provided summary explaining that HCC retains statutory duty to ensure sufficient places and performs 'facilitator' role in delivering premises (in form of either land or built facilities) and then inviting bidders. Explained that only HCC has CPO powers for education purposes.
- NS questioned, given Thomas Alleyne conversion to Academy status, whether any site here would now be expected to be a relocation or entirely new provision.
- HCC confirmed expectation that any secondary school at north-east Stevenage would be entirely 'net additional' in terms of provision. Possibility of an all-through school (Aged 4-18) briefly raised though not discussed in detail.

North of Stevenage

- BC outlined initial assessment of need for 2x2fe schools to serve the two 'halves' of the development in SBC and NHDC respectively.
- SBC / NHDC questioned this on grounds of viability, loss of housing numbers and this being at top end of range identified in BC's requirements [2.3 – 3.6fe]
- SBC / NHDC agreed in principle to the provision of 1x3fe school on this site. Best location to be jointly determined and asked HCC to consider this.

West of Stevenage

- SBC accepted HCC requirement for up to 3fe primary school provision on site as part of scheme for 1,350 dwellings.
- NS highlighted NHDC proposal to 'safeguard' land west of Stevenage for future development for up to 3,100 homes. Taken in conjunction with SBC proposals this would broadly 'reinstate' the former application for 5,000 homes here. Large site would ultimately require secondary school to be provided, though not considered a significant issue in current local plan cycle.

Knebworth / Codicote

- DH acknowledged need for additional 1fe school at Knebworth to meet requirements of new sites.
- Codicote more constrained and further consideration required.
- *As all sites in which NHDC had an interest had been discussed, CC & DH left the meeting at this point*

Town Centre

- AC explained that, following receipt of NS comments, HCC had further reviewed capacity in and around the town centre.
- Considered there may be potential to expand Broom Barns [750m east of town centre] to 2fe. Acknowledged that Fairlands had capacity insofar as it currently plays a significant role in 'mopping up' requirements from a wider area.
- Woolenwick, Letchmore and St. Nicholas – no expansion potential.
- Bedwell primary has 0.5fe potential.

- However, likely that requirement for 2fe remains based upon ratio of 1fe per 850 homes.
- CD provided on oversight of town centre schemes and work undertaken to bring sites forward over last twelve months. Viability was a significant issue on many of these sites.
- Loss of housing land for school sites potentially accentuated in town centre ~ in terms of both numbers and viability ~ due to emphasis on high densities.
- NS reiterated that SBC likely to be 'on the margins' in terms of providing enough sites to be able to meet their anticipated housing target which is expected to rise to 7,000+ so cannot afford to lose significant sites / numbers from supply.
- KC explained, and provided copy of, outline brief for urban school site. This reduces land requirement for 2fe primary to approx. 0.5 – 0.6ha – not significantly more than requirement for infant school proposed by NS.
- This would require provision of detached playing fields within 400m. Initial aerial photo search showed no options within this distance of Leisure Park site.
- CD explained that Leisure Park site is already considering significant requests, including potential relocation of SBC leisure facilities, including swimming pool. King George V playing fields just outside 400m zone and development in town centre would aim to significantly improve links
- CT highlighted that provision in this format would be against HCC's normal expectations and, potentially, those of occupiers of new development who might anticipate good quality provision.
- General acknowledgement that in an 'ideal world' schools would meet normal operational expectations / requirements but town centre development proposed specific challenges.
- CT identified opportunity to link any school on Leisure Park to any relocated leisure facilities to help 'offset' lack of on-site provision.
- KC explained that no decision yet taken by HCC as to whether they could support this approach in principle. SBC requested clarity on this matter.
- NS questioned use of HCC assets in town centre for schools provision. HCC explained former police station building on Southgate an option but would require provision of Multi-Use Games Area (MUGA) on adjacent SBC-owned land. NS / CD to investigate.
- NS noted additional provision here would be particularly close to Broom Barns. AC to check whether this would be an issue in terms of overlapping catchments.

South-east Stevenage

- HCC had identified requirement for 1fe school to serve large schools to south-east of town.
- SBC highlighted 'circular argument' whereby removing land for school provision could bring housing numbers below threshold for requiring on-site provision. Also commented on viability and likely infrastructure costs to create access from A602
- NS identified Longmeadow / Shephalbury Park as appearing to have capacity to expand (based on site size) and requested HCC look at these sites to make provision
- AC noted these sites approximately 2km from the proposed development and questioned ability to walk or cycle to school
- NS confirmed that existing cycle / footpath network extends to Bragbury End. General expectation that access to this would be included in any schemes.

Other

- General discussions about other school sites in Stevenage.

- KC advised new BB108 Standards [on size of school premises] not yet formally adopted by HCC
- CT questioned whether NS' inclusion of potential expansion of Almond Hill was a double-count as this may be needed to meet short-term demand from development.
- NS / CD advised that figures provided to HCC included approx. 1,000 completions and permissions since April 1 2011 to cover whole plan period. BC to check that this hasn't been re-counted in HCC's future requirements.
- KC advised that 'abnormals' ~ topography, woodland etc can reduce ability to expand below that which might be suggested by simple reading of site size. Trotts Hill and Moss Bury schools identified as examples.
- Agreed to hold a further meeting in approximately three months to discuss progress. AC to canvass potential dates.

Key outcomes / actions

- **HCC to provide appropriate representations to NHDC local plan consultation to inform future consideration of land to the north-east of Stevenage;**
- **HCC to circulate paper explaining role of County Council in providing school places in current environment;**
- **HCC to consider SBC / NHDC proposal for 1x3fe school at north Stevenage;**
- **HCC to confirm whether, in principle, 'urban school' proposal can be supported;**
- **SBC to approach owners of Leisure Site viz on-site provision and Estates team regards potential provision of MUGA on Southgate car park site to inform discussions regards future provision in town centre;**
- **HCC to consider potential of Longmeadow / Shephalbury Park sites to meet demand from south-east Stevenage;**
- **BC to ensure completions / permissions since 2011 not double-counted in requirements;**
- **Further meeting to progress these issues in February 2014.**

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Other

- General discussions about other school sites in Stevenage.

Appendix 1ci

By e-mail

Hertfordshire County Council
County Hall
Hertford SG13 8DE

Tel: 01992 588275
Email: ailsa.davis@hertsc.gov.uk
Contact: Ailsa Davis

Date 28 March 2013

Dear Ms Skeels

NORTH HERTFORDSHIRE DISTRICT COUNCIL LOCAL PLAN – GROWTH LEVELS AND DIRECTIONS

Thank you for your letter dated 8 February 2013 consulting Hertfordshire County Council on;

- The acceptability of 10,700 dwellings as an overall target for the District in the period 2011 to 2031;
- The possible locations for strategic scale developments; and
- The non-strategic sites.

This response is made by Hertfordshire Property on behalf of Children's Services, Health and Community Services, Early Years and Childcare, Youth, Fire and Rescue Services, Gypsy Section and also on behalf of the Waste Disposal Authority.

We continue to positively welcome the ongoing opportunity being provided to engage in discussions with the Local Planning Authority (LPA) to identify the implications, where possible, for the services and service delivery. In this response we have sought to identify how the proposed housing growth level and location of new housing within North Hertfordshire could impact upon service requirements and the need for additional sites from a spatial planning perspective.

HCC will continue to determine child yield based on a range of 1FE (210 pupils) per 500 dwellings to be 97.5% confident of not underestimating yield. However, the yield will continue to be expressed as a range of 1FE per 500 – 850 dwellings as set out within the draft NHDC Infrastructure Delivery Plan.

These representations should be read in conjunction with the HCC representations dated February 2012 submitted in response to your previous Local Plan consultation regarding housing growth targets 2011-2031.

I will now deal with each settlement in turn setting out HCC's infrastructure requirements:

North Stevenage

2300 dwellings (1700 within North Herts and 600 within Stevenage)

2.7FE to 4.6FE

Infrastructure Requirements:

- 1 new primary school and 1 reserve primary school site (2.5 hectares);
- New secondary school at Great Ashby – site of secondary school granted planning permission April 2010 should be designated as an education zone/allocation within the Local Plan to provide flexibility and ensure sufficient land is available to meet educational need. The proposed housing cannot come forward without the school site;
- Nursery provision for 105 to 181 children;
- Children's Centre;
- Bowes Lion House Youth Centre in central Stevenage upgraded and youth provision within new community centre x 1;
- New and enlarged library as part of shared service development within town centre.

West Stevenage

5000 dwellings (3100 within North Herts and 1900 within Stevenage)

5.8FE to 10FE

Infrastructure Requirements:

- 4 new primary schools;
- New secondary school;
- Nursery provision for 248 to 420 children;
- Bowes Lion House Youth Centre in central Stevenage upgraded and youth provision within new community centres x 2;
- 2 Children's Centres;
- New and enlarged library as part of shared service development within town centre.

North East Stevenage

5,700 dwellings

6.7FE to 11.4FE

Infrastructure Requirements:

- 4 new primary schools and 1 reserve school site (2.5 hectares)
- New secondary school at Great Ashby – site of secondary school granted planning permission April 2010 should be designated as an education zone/allocation within the Local Plan to provide flexibility and ensure sufficient land is available to meet educational need. The proposed housing cannot come forward without the school site;
- Nursery provision for up to 281 to 479 children
- 2 Children's Centres
- Bowes Lion House Youth Centre in central Stevenage upgraded and youth provision within new community centres x 2

- New and enlarged library as part of shared service development within town centre

Hitchin

SW Hitchin strategic site – Up to 7400 dwellings

8.7FE to 14.8FE

Infrastructure Requirements:

- Minimum 6 new primary schools;
- 2 new secondary schools (current limited capacity in Hitchin secondary schools required to meet existing forecast need);
- Nursery provision for up to 395 to 672 children;
- 3 community centres;
- Youth provision within new community centres;
- Improvements to Hitchin library;
- Hitchin fire station would need to become a wholetime 24 hour crewed fire station. This means it will be necessary to increase the number of firefighters from the existing 14 to 28 personnel.

Non-strategic sites (priority 1,2 and 3) – Up to 1531 dwellings

1.8FE to 3FE

Infrastructure Requirements:

- Additional school places required. Likely to be provided by expansion of existing schools and/or use of HCC owned reserve school site (land off Bearton Green).

East of Luton

Up to 1,400 dwellings

1.6FE to 2.8FE (Hertfordshire County Council child yield rate of 1FE per 850 to 500 dwellings)

4FE (Luton Borough Council child yield rate of 1FE per 305 dwellings)

Infrastructure Requirements:

- It would be prudent to seek 4FE worth of school provision, as the population profile on the edge of Luton is likely to reflect the existing population demographic of Luton. Following discussions with Luton BC, HCC would request either 2 x 2FE primary schools or a 4FE all through school to include secondary. If an all through school was not an option, HCC suggest the additional secondary capacity could be met as part of another strategic housing site that Luton BC may be planning on the edge of the settlement. Alternatively, that need could be satisfied as part of any development being considered in South Bedfordshire close to Luton. Existing Hitchin secondary schools have no capacity to accommodate the growth from this site and there is no obvious current capacity at a secondary level that relates well to the east of Luton development elsewhere in Hertfordshire. Luton BC have also confirmed to HCC that a solution for secondary cannot rely on Luton for additional capacity.
- Nursery provision for 50 to 84 children;
- Improvements to existing Children's Centre (TBC with Luton Borough Council)

- Improvements to existing youth provision in Luton (TBC with Luton Borough Council)
- Improvements to existing Library or mobile library service (TBC with Luton Borough Council)

North of Letchworth

1000 dwellings

1.1FE to 2FE

Infrastructure Requirements:

- New primary school;
- Nursery provision for 49 to 84 children;
- Improvements to Letchworth library;
- Community centre with youth provision.

Non-strategic sites (priority 1,2 and 3) – Up to 1038 dwellings

1.2FE to 2FE

Infrastructure Requirements:

- Additional school places required. Likely to be provided by expansion of existing schools and/or use of HCC owned reserve school site (land at Southern Way).
- Site L/m1 'Library and Museum Site, Gernon Road' identifies capacity for 12 dwellings. HCC would expect that any redevelopment of the site to retain provision for a library of the same size and facilities as the existing.

Knebworth

Non-strategic sites (priority 1,2 and 3) – Up to 979 dwellings

1.1FE to 2FE

Infrastructure Requirements:

- New primary school
- Nursery provision for up to 46 to 76 children
- No capacity in existing central and southern Stevenage secondary schools. Ideally pupils would travel to new secondary in West of Stevenage if that site were to come forward or should one of the northern Stevenage strategic sites come forward, pupils in Stevenage could be redistributed to the new secondary school in the north to free up capacity in the centre and south of the town.
- Youth facility within a new or extended community hall
- No additional library provision
- No additional Children's Centre provision, continue to use Barleyfields.
- No additional fire provision

Wymondley

Non-strategic sites (priority 1, 2 and 3) – Up to 781 dwellings

0.9 to 1.5FE

- Existing village school does not have expansion potential unless additional land is acquired to increase the site area or detached playing fields are identified. School could be relocated onto a new 2FE site.
- As there is no capacity in existing Hitchin secondary schools to accommodate this housing, Wymondley expansion can only go ahead if South West Hitchin expansion goes ahead as pupils from Wymondley would go to the two new Hitchin secondary schools.
- Nursery provision for 29 to 50 children.
- No additional youth provision
- No additional library provision other than mobile library
- No additional Children's Centre provision

Rush Green

1000 dwellings

1.1FE to 2FE

Infrastructure Requirements:

- New primary school;
- New secondary school in West Stevenage strategic site;
- Nursery provision for 49 to 84 children;
- Community centre with youth provision.

This site is well related to the proposed West Stevenage strategic site. As such, the secondary school child yield could be accommodated in the new secondary school provided as part of the West Stevenage strategic site. It is considered therefore, that the Rush Green strategic site should only come forward alongside the West Stevenage site. There is no capacity in existing Hitchin or Stevenage secondary schools to accommodate the yield resulting from this site.

Ashwell

Non-strategic sites (priority 1, 2 and 3) = Up to 61 dwellings

0.1FE

No infrastructure requirements

Baldock

Non-strategic sites (priority 1, 2 and 3) = Up to 1177 dwellings

1.3FE to 2.3FE

Infrastructure Requirements:

- Two new primary schools
- Nursery provision for up to 58 to 98 children
- Expansion of Knights Templar secondary school or creation of an all through school as part of the planned housing development to the east of the town.

Barkway

Non-strategic sites (priority 1, 2 and 3) = Up to 155 dwellings

0.3FE

No infrastructure requirements

Barley

Non-strategic sites (priority 1, 2 and 3) = Up to 44 dwellings

0.08FE

No infrastructure requirements

Codicote

Non-strategic sites (priority 1, 2 and 3) = Up to 134 dwellings

0.3FE

Infrastructure requirements:

- Additional school places required. To be provided by expansion of existing primary school, subject to planning permission.

Graveley

Non-strategic sites (priority 1, 2 and 3) = Up to 88 dwellings

0.2FE

No infrastructure requirements

Ickleford

Non-strategic sites (priority 1, 2 and 3) = Up to 57 dwellings

0.1FE

No infrastructure requirements

Kimpton

Non-strategic sites (priority 1, 2 and 3) = Up to 104 dwellings

0.2FE

No infrastructure requirements

King's Walden

Non-strategic sites (priority 1, 2 and 3) = Up to 53 dwellings

0.1FE

No infrastructure requirements

Nuthampstead

Non-strategic sites (priority 1, 2 and 3) = Up to 11 dwellings

0.02FE

No infrastructure requirements

Offley

Non-strategic sites (priority 1, 2 and 3) = Up to 62 dwellings

0.1FE

No infrastructure requirements

Pirton

Non-strategic sites (priority 1, 2 and 3) = Up to 146 dwellings

0.3FE

No infrastructure requirements

Reed

Non-strategic sites (priority 1, 2 and 3) = Up to 79 dwellings

0.1FE

No infrastructure requirements

Royston

Non-strategic sites (priority 1, 2 and 3) = Up to 877 dwellings

1.7FE

No infrastructure requirements

Sandon

Non-strategic sites (priority 1, 2 and 3) = Up to 75 dwellings

0.1FE

No infrastructure requirements

St Ippolyts

Non-strategic sites (priority 1, 2 and 3) = Up to 42 dwellings

0.08FE

No infrastructure requirements

St Paul's Walden

Non-strategic sites (priority 1, 2 and 3) = Up to 120 dwellings

0.2FE

No infrastructure requirements

Therfield

Non-strategic sites (priority 1, 2 and 3) = Up to 51 dwellings

0.1FE

No infrastructure requirements

WASTE DISPOSAL AUTHORITY (WDA) ISSUES

The Waste Disposal Authority has prepared a Municipal Waste Spatial Strategy setting out and justifying its own service requirements to 2031. This strategy takes into account the former East of England plan housing growth levels. Even if the District is planning for less housing, it is likely additional waste infrastructure will still be required to address existing deficiencies. The Waste Disposal Authority considers that the following waste infrastructure will be required in North Herts over the period to 2031:

- The Letchworth Household Waste Recycling Centre suffers from queuing at peak periods and the Waste Disposal Authority considers that it needs to be either enlarged or relocated nearby.
- A new Household Waste Recycling Centre to serve Hitchin. The absence of a Household Waste Recycling Centre in Hitchin is seen as a major weakness in the network, resulting in the areas to the west of the town being over 5 miles from a centre.
- In terms of the depots owned and managed by the Waste Collection Authorities, spatial requirements over the period to 2031 will be addressed by the District and Borough Councils themselves. Possible requirements may include a new depot for North Hertfordshire District Council.
- The Waste Disposal Authority considers that a waste transfer station would be justified in the northern part of the county, in the vicinity of the A1 / A505 junction. This would serve the North Hertfordshire towns of Hitchin, Letchworth, Baldock and Royston as well as northern Stevenage.

Yours sincerely

Ailsa Davis
Senior Planning Officer
Hertfordshire Property

Appendix 1di

By e-mail

Hertfordshire County Council
County Hall
Hertford SG13 8DE

Tel: 01992 588275
Email: ailsa.davis@hertsc.gov.uk
Contact: Ailsa Davis

Date 19 November 2012

Dear Karen Allen

NORTH HERTFORDSHIRE DISTRICT COUNCIL LOCAL PLAN – EMERGING OPTIONS FOR FUTURE HOUSING GROWTH

Thank you for your letter dated 26 October 2012 consulting Hertfordshire County Council on a number of possible strategic housing sites. HCC will continue to determine child yield based on a range of 1FE (210 pupils) per 500 dwellings to be 97.5% confident of not underestimating yield. However, the yield will continue to be expressed as a range of 1FE per 500 – 850 dwellings as set out within the draft NHDC Infrastructure Delivery Plan.

HCC Children's Services are considering the idea of a smaller number of 3FE schools to reduce land take and make the development options more viable and sustainable. I will advise you of their position as soon as I hear. In the meantime, the preferred infrastructure requirements for schools will continue to be expressed as 2FE.

Whilst I acknowledge that the plans do not relate to set boundaries and are for indicative purposes only, it is noted that the Hitchin strategic site incorporates some HCC rural estate at Offley Bottom Farm and Westmill Farm. HCC also own a 1.5 hectare site in Knebworth (land at Watton Road, north of Bell Close). HCC as landowner would make this land available, should it be required, to assist NHDC in the best spatial planning of their area.

I will now deal with each site in turn setting out HCC's infrastructure requirements:

North Stevenage (2,150 dwellings) – 2.5 to 4.3FE

- 1 new primary school and 1 reserve primary school site (2.5 hectares)
- Relocation of existing secondary school
- Nursery provision for 105 to 181 children
- Children's Centre
- Bowes Lion House Youth Centre in central Stevenage upgraded and youth provision within new community centre x 1
- New and enlarged library as part of shared service development within town centre
- New fire station not required

West Stevenage (5,000 dwellings) – 5.9 to 10FE

- 4 new primary schools
- New secondary school
- Nursery provision for 248 to 420 children
- Bowes Lion House Youth Centre in central Stevenage upgraded and youth provision within new community centres x 2
- 2 Children's Centres
- New and enlarged library as part of shared service development within town centre
- New fire station not required

North East Stevenage (5,700) – 6.7 to 11.4FE

- 4 new primary schools and 1 reserve school site (2.5 hectares)
- New secondary school (extant planning permission for secondary school at Great Ashby – expires April 2013)
- Nursery provision for up to 281 to 479 children
- 2 Children's Centres
- Bowes Lion House Youth Centre in central Stevenage upgraded and youth provision within new community centres x 2
- New and enlarged library as part of shared service development within town centre
- New fire station not required

South West Hitchin (8,000) – 9.4 to 16FE

- Minimum 6 new primary schools with expansion potential to 3FE
- 2 new secondary schools (current limited capacity in Hitchin secondaries required to meet existing forecast need)
- Nursery provision for up to 395 to 672 children
- 3 community centres
- Youth provision within new community centres
- Improvements to Hitchin library
- If all the Stevenage and Hitchin sites come forward, Hitchin fire station would need to become a wholtime 24 hour crewed fire station. This means it will be necessary to increase the number of firefighters from the existing 14 to 28 personnel.

East of Luton (1,000) – 1.2 to 2FE

- 1 new primary school
- Increase capacity of secondary school(s) in Luton.
- Nursery provision for 50 to 84 children
- Expansion/upgrade of existing Children's Centre (check with Luton Borough Council)
- Upgrade of existing youth provision in Luton (check with Luton Borough Council)
- Upgrade of existing Library or mobile library service (check with Luton Borough Council)

Knebworth – 1.1 to 1.8FE

- New primary school
- Nursery provision for up to 46 to 76 children
- No capacity in existing central and southern Stevenage secondary schools. Ideally pupils would travel to new secondary in West of Stevenage or pupils in Stevenage would be redistributed to the new secondary school(s) in the north to free up capacity in the south of the town.
- Youth facility within a new or extended community hall
- No additional library provision
- No additional Children's Centre provision, continue to use Barleyfields.
- No additional fire provision

Wymondley – 0.7 to 1.2FE

- Existing village school does not have expansion potential unless additional land is acquired to increase the site area or detached playing fields are identified. School could be relocated onto a new 2FE site.
- As there is no capacity in existing Hitchin secondary schools to accommodate this housing, Wymondley expansion can only go ahead if South West Hitchin expansion goes ahead as pupils from Wymondley would go to the two new Hitchin secondary schools.
- Nursery provision for 29 to 50 children.
- No additional youth provision
- No additional library provision other than mobile library
- No additional Children's Centre provision

Roundwood NES3 – 0.4 to 0.7FE

- Expansion of nearby schools and nursery to increase capacity.
- No other on site provision required.

Yours sincerely

Ailsa Davis
Senior Planning Officer
Hertfordshire Property

Appendix Three: Decision notice (Great Ashby)



Town and Country Planning Act 1990 (as amended)

DECISION NOTICE

CC Application No: 1/1349-09(CC0709)

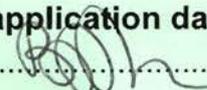
Description & location of development:

CONSTRUCTION OF A NEW SECONDARY SCHOOL AT LAND EAST AND WEST OF MENDIP WAY, GREAT ASHBY, STEVENAGE TO INCLUDE: SCHOOL BUILDINGS, ACCESSES, CAR PARK, FLOODLIT ALL WEATHER PITCH, FLOODLIT MULTI-USE GAMES AREAS, GRASS PLAYING PITCHES, STORM WATER ATTENUATION POND, MEANS OF ENCLOSURE, NEW AND DIVERTED FOOTPATHS / CYCLEWAYS, LANDSCAPING AND RELATED WORKS ON LAND TO THE NORTH OF NEW SPRING WOOD; ACCESS ROUNDABOUT ON MENDIP WAY; ACCESS ROAD, CAR AND COACH SET DOWN / PICK-UP / PARKING AREA, MEANS OF ENCLOSURE, NEW AND DIVERTED FOOTPATHS / CYCLEWAYS, LANDSCAPING, SWALES AND RELATED WORKS ON LAND TO THE EAST OF MENDIP WAY; PLUS ECOLOGICAL MITIGATION WORKS IN NEW SPRING WOOD, THE CONSTRUCTION OF A DRAINAGE DITCH ADJACENT TO LONGDELL WOOD AND THE PROVISION OF REPLACEMENT OPEN SPACE ON LAND WEST OF MENDIP WAY

To: Hertfordshire County Council
Children, Schools and Families
County Hall
Pegs Lane
Hertford
SG13 8DE

In pursuance of its powers under the above Act and the Orders and Regulations for the time being in force thereunder, the Council hereby PERMITS the development proposed by you in your application dated

Dated: 23rd day of April 2010

Signed: 

DEVELOPMENT CONTROL MANAGER

03 July 2009 and amended in accordance with your letter dated 10 November 2009 relating to the following plans/drawings and supporting planning documents: Site Location Plan (4682/001F), Site Identification Plan (4682/014H), Access and Drop off/Pick Strategy (Drawing E1678/18/Q), School Access Link (4682/029A), Development Parameters (North Sheet) (Drawing 4682 030 Rev C), Development Parameters (South sheet) (Drawing 4682 031 Rev D), Notes on Development Parameters Drawings (November 2009); and technical information contained in the Environmental Statement (June 2009, amended November 2009); Supporting Planning Statement (June 2009), Design and Access Statement (June 2009), Transport Assessment (May 2009, as amended December 2009), and subject to the following conditions:

Reserved Matters

1. Prior to the commencement of development details of the appearance, landscaping, layout and scale ("reserved matters"), shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented and carried out in accordance with the approved details.

Reason

To ensure that the development is carried out in accordance with the details hereby approved.

Time Limit

2. Application for approval of the reserved matters shall be made to the Local Planning Authority not later than three years from the date of this permission. The development shall be implemented within 2 years of the granting of permission for the reserved matters.

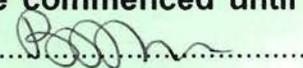
Reason

To comply with the terms of the Town and Country Planning Act 1990 (as amended).

Access

3. Prior to the first occupation of the development the access road, pupil pick up/drop off facility, roundabout, footways and cycleways shown on approved drawing E/1678/18Q shall be constructed in accordance with the approved drawing. The development hereby permitted shall not be commenced until

Dated: 23rd day of April 2010

Signed: 

DEVELOPMENT CONTROL MANAGER

detailed plans and information on the methods of construction for the access road, pupil pick up/drop off facility, roundabout, footways and cycleways have been submitted to and approved in writing by the Local Planning Authority. Implementation shall be carried out in accordance with the approved plans.

Reason

To ensure development is carried out in accordance with the planning approval and in the interests of highway safety.

Accordance

4. The development shall not exceed the scope of development set out in the Development Parameter Drawings (4682/030C & 4682/031D), Development Parameter Notes (November 2009), Design and Access Statement (June 2009), and Environmental Statement (June 2009 & November 2009) submitted with the application.

Reason

To ensure development is carried out in accordance with the planning approval.

Floor Area

5. The floor area of any buildings comprised in the development shall not exceed 14,500 square metres (Gross External Area).

Reason

To ensure development is carried out in accordance with the planning approval.

Building Height

6. The height of any building comprised within the development shall not exceed 2 storeys or 13.9 metres (to include any plant equipment) above existing site levels, unless otherwise agreed in writing by the Local Planning Authority.

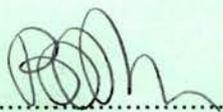
Reason

To ensure development is carried out in accordance with the planning approval.

Levels

7. Prior to the commencement of development a detailed plan showing existing and proposed site levels shall be submitted to and approved in writing by the Local Planning Authority. The finished site levels shall accord with the approved plan unless otherwise agreed in writing by the Local Planning Authority.

Dated: 23rd day of April 2010

Signed: 

DEVELOPMENT CONTROL MANAGER

Reason

To ensure that the development is carried out in accordance with the planning approval.

Use of Buildings

8. The buildings comprised in the development hereby permitted shall not be used other than for school and community purposes falling within Use Class D1 (non-residential institutions), and sport and recreation falling within Use Class D2 of the Town and Country Planning (Use Classes) Order 1987 (as amended).

Reason

To ensure that the permitted falls within the scope of the planning approval

Phasing

9. Prior to the commencement of development, a plan showing a programme of phasing of development, including the provision of the roads, cycleways, footpaths, fire hydrants, landscaping, open space and children's play area shall be submitted to and approved in writing by the Local Planning Authority. Phasing of the development shall be carried out in accordance with the approved details.

Reason

To ensure development is carried out in accordance with the planning approval and to safeguard local environmental conditions.

Materials of Construction

10. No development shall take place until the details including samples of the materials to be used in the construction of the external surfaces of the buildings hereby permitted have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

Reason

To ensure the development meets a high standard of design and appearance in accordance with East of England Plan (2008) Policies SS1 and ENV7.

Renewable Energy

11. Prior to the commencement of development a scheme identifying how the development will secure at least 10% of its energy needs from decentralised and renewable or low-carbon sources shall be submitted for approval to the Local Planning Authority. The approved scheme shall be implemented in full

Dated: 23rd day of April 2010

Signed: 

DEVELOPMENT CONTROL MANAGER

prior to the commencement of development unless it is clear that the target is not feasible or viable as demonstrated by an assessment carried out by a suitably qualified person, the output of which shall be submitted to the local planning authority for written approval.

Reason

To ensure that the development meets regional and national targets for reducing climate change emissions, in accordance with Policy ENG1 of the East of England Plan (May 2008).

Sustainable Design

12. The development shall achieve the Building Research Establishment's *BREEAM* 'excellent standard' unless it is demonstrated that the *BREEAM* 'excellent standard' is not feasible or viable as demonstrated by an assessment carried out by a suitably qualified person, the output of which shall be submitted to the local planning authority for written approval.

Reason

To ensure the development provides an appropriate standard in relation to environmental performance and in the interests of East of England Plan (2008) Policy SS1.

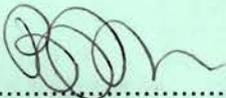
Landscape Scheme

13. The landscaping details required by Condition 1 shall provide for a scheme of tree planting and landscaping, which shall include indications of all existing trees and hedgerows on the land, all of which are to be retained, together with measures for their protection in the course of development. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in accordance with the phasing plan agreed in accordance with Condition 9. The scheme shall include a programme for landscape maintenance for a minimum period of 5 years and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written approval to any variation.

Reason

To provide an accurate record of existing trees to be retained and to ensure an appropriate landscaping scheme can be achieved to mitigate the impacts development.

Dated: 23rd day of April 2010

Signed: 

DEVELOPMENT CONTROL MANAGER

Landscape Protection

14. Other than those trees shown for removal on plan referenced 4682/029A, no trees within or adjoining the application site shall be cut down, uprooted, destroyed, lopped or topped within a period of 5 years from the commencement of development, without the previous written approval of the Local Planning Authority.

Reason

To protect existing landscape features in the interests of visual amenity and biodiversity.

15. No trees within or adjoining the application site (including those trees shown for removal on plan referenced 4682/029A) shall be cut down, uprooted, destroyed, lopped or topped in advance of the granting of planning permission for reserved matters.

Reason

To ensure adequate protection measures are in place to protect existing trees and hedges in advance of approval of reserved matters.

Tree Protection

16. Prior to the commencement of development a scheme for the protection of retained trees within and adjoining the site (as appropriate) shall be submitted for approval to the Local Planning Authority. The scheme shall accord with the British Standard BS5837. The approved scheme shall be implemented prior to the commencement of development and retained at all times during the construction period, unless otherwise agreed in writing by the Local Planning Authority.

Reason

To safeguard retained trees and in the interests of amenity and biodiversity.

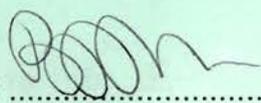
Construction: Access

17. Prior to the commencement of development, details of construction vehicle movements and construction access arrangements shall be submitted to and approved in writing by the Local Planning Authority. The construction access shall be implemented and maintained in accordance with the approved details throughout the life of the construction.

Reason

To ensure the impact of construction vehicles on the local road network is minimised.

Dated: 23rd day of April 2010

Signed: 

DEVELOPMENT CONTROL MANAGER

Construction: Parking and Storage

18. No development shall take place until the details of construction parking, storage, vehicle turning facilities, and delivery areas have been submitted to and approved in writing by the Local Planning Authority. These areas shall be provided within the site on land which is not public highway for the duration of development. The use of such areas shall not interfere with the use of the public highway.

Reason

To ensure adequate parking/storage is provided within the site to avoid any adverse impacts on the local road network in the interests of highway safety and free flow of traffic, in accordance with East of England Plan (2008) Policy T14.

Construction: Wheel Washing

19. No works of development shall take place until the details of wheel washing facilities for construction vehicles have been submitted to and approved in writing by the Local Planning Authority and until the approved facilities have been installed. Throughout the construction period all construction traffic involved in the development shall use the approved wheel washing facilities.

Reason

To minimise mud, soil and other material deposits on the highway connected with the development, and in the interests of highways safety.

Parking & Access

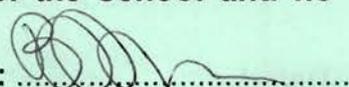
20. The reserved matters or full planning application (as appropriate) shall provide a minimum of 232 car parking spaces within the application site, which shall be maintained for use of the school and shall be used for no other purposes, unless otherwise agreed in writing by the Local Planning Authority.

Reason

To ensure that adequate on site parking is provided within the site at all times and to maintain normal operation of the highway, in accordance with East of England Plan (2008) Policy T14 and North Herts District Local Plan (1996) Policy 55.

21. Prior to the first occupation of the development, on-site access, car parking and turning areas shall be constructed, surfaced and permanently marked out in accordance with condition 20. The car parking and turning areas provided shall be retained for school use for the life of the school and no

Dated: 23rd day of April 2010

Signed: 

DEVELOPMENT CONTROL MANAGER

other purpose, unless otherwise agreed in writing by the Local Planning Authority.

Reason

To ensure that adequate parking is provided at all times.

22. **Prior to the first occupation of development, details of a Car Parking and Management Plan shall be submitted to and agreed in writing by the Local Planning Authority.**

Reason

To ensure there is adequate parking for the school and to minimise disruption for adjoining residents in accordance with East of England Plan (2008) Policies T2, T4, T9, and T14.

23. **Prior to the first occupation of the development, a parking/enforcement scheme for Mendip Way in the vicinity of Round Diamond School shall be submitted for written approval to the Local Planning Authority.**

Reason

To minimise the impact of indiscriminate parking and to allow free flow of traffic on the public highway, in accordance with East of England Plan (2008) Policy T14.

School Travel Plan

24. **Within 6 months of commencement of development a School Travel Plan (STP) shall be prepared to current Hertfordshire County Council's criteria and submitted for approval to the Local Planning Authority. The approved STP shall be implemented in full throughout the life of the school. The STP shall be monitored annually and updated accordingly, with outcomes reported to Hertfordshire County Council School Travel Plan Team.**

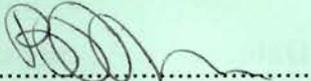
Reason

To assist in achieving greater use of sustainable transport modes, with less reliance on the private car, in accordance with East of England Plan (2008) Policies T2, T4, T9, T14.

School Bus Service

25. **Within 6 months of the date of this permission details of an interim school bus service shall be submitted for written approval to the Local Planning Authority. The interim school bus service shall operate between the North-East Stevenage area to the existing Thomas Alleyne School for an agreed period prior to the relocation of the school, and between the Old Town area and the new Thomas Alleyne School for an agreed period following relocation of the school. The interim school bus service shall be operated in accordance with the**

Dated: 23rd day of April 2010

Signed: 

DEVELOPMENT CONTROL MANAGER

approved details, unless otherwise agreed in writing by the Local Planning Authority.

Reason

In the interests of sustainable transport in accordance with East of England Plan (2008) Policy T2.

Cycle Storage

26. Prior to the commencement of development details of cycle storage facilities shall be submitted for approval to the Local Planning Authority. The approved cycle storage shall be implemented as approved prior to the first occupation of the development and maintained thereafter for the life time of the school.

Reason

To ensure that sufficient cycle parking is provided, in accordance with East of England Plan (2008) Policy T9.

Rights of Way

27. Prior to the commencement of development details of the design, construction and maintenance of all Public Rights of Way and footways within the site shall be submitted and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to the first occupation of development and thereafter maintained in accordance with the approved details.

Reason

To ensure the footpaths comply with County standards and in the interests of wider access to the network in accordance with East of England Plan (2008).

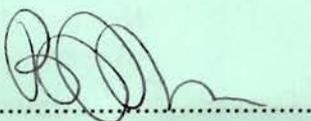
Footpath Improvements

28. Prior to the commencement of development a scheme of off-site footpath and cycleway improvements and maintenance in the vicinity of the site, as set out in the Transport Assessment (May 2009), shall be submitted to and agreed in writing by the Local Planning Authority. The approved scheme shall be implemented prior to the first occupation of development and thereafter maintained in accordance with the approved details.

Reason

To ensure development is carried out in accordance with planning approval and in accordance with East of England Plan (2008) Policy T9.

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Pedestrian Access

29. Prior to the first occupation of the development a scheme for the closure of the existing pedestrian accesses between the site and Grampian Place shall be submitted for approval to the Local Planning Authority. Prior to its submission the scheme shall be subject to consultation with residents of Grampian Place. The scheme shall be implemented in accordance with the approved details and thereafter maintained at all times in connection with the approved development.

Reason

To reduce the potential for on-street parking and pupil pick up/drop off in these streets associated with the school.

Children's Play Area

30. Prior to the commencement of development, the children's play area located east of Mendip Way shall be relocated west of Mendip Way and provided in a suitable condition throughout construction of the development. Prior to the first occupation of the development the children's play area shall be re-provided east of Mendip Way, in accordance with Condition 9.

Reason

To ensure the continued availability of the children's play facilities throughout the development period and in the interests of amenity.

Sports facilities: Provision

31. The sports facilities hereby permitted shall be provided in accordance with the approved drawings prior to the first occupation of the development. The sports facilities shall be made available for school and community use at appropriate times in accordance with the details of an approved Community Use Agreement, pursuant to condition 33.

Reason

To ensure the sports facilities are completed for the benefit of the school and the wider community.

Sports Facilities: Hours of Use

32. The permitted hours of use of the all-weather pitch and multi-use games area are:

| | |
|------------------|----------------|
| Monday to Friday | 07.30 to 21.00 |
| Saturdays | 09.00 to 14.00 |

No use is permitted on Sundays or Bank Holidays unless otherwise agreed in writing by the Local Planning Authority.

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Reason

To limit the impact of light pollution in the Metropolitan Green Belt and in the interests of residential amenity.

Sports Facilities: Community Use Agreement

33. Prior to the first occupation of the development, a scheme comprising a Community Use Agreement relating to the sports facilities shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of pricing policy, hours of use (having regards to Condition 32), access by non-school users/non-members, and management responsibilities, and shall include a mechanism for review. The approved scheme shall be implemented prior to the first occupation of the development and thereafter reviewed in accordance with the approved scheme.

Reason

To secure well managed and safe community access to school sports facilities for the development of sport.

Lighting

34. Prior to the commencement of development, details of a lighting scheme for all proposed lighting within the site, including floodlighting of the all-weather pitch and multi use games areas, shall be submitted to and approved in writing by the Local Planning Authority. The lighting scheme shall be carried out in accordance with the approved scheme.

Reason

To minimise the impact of artificial lighting on the amenity of residential properties adjoining the site and to minimise visual intrusion / light pollution.

35. Within 6 months of the first use of any floodlights in connection with the use of the all weather pitch and multi use games areas, pursuant to condition 34, the light spillage produced by the floodlights shall be measured and the results submitted to the local planning authority for consideration. If required by the Local Planning Authority steps shall be taken to reduce light spillage from the floodlights.

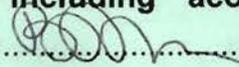
Reason

To minimise the impact of artificial lighting on residential amenity and biodiversity in the vicinity of the site, and to minimise visual intrusion and light pollution.

Noise Attenuation

36. Prior to the commencement of development, details of proposed noise mitigation measures including acoustic

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fencing and construction hoardings shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be fully implemented prior to the commencement of development.

Reason

To limit the noise impact during construction and operational phases of development, in accordance with best practice and in the interests of residential amenity.

37. Prior to the commencement of development, details of a scheme for noise attenuation from buildings and mechanical plant shall be submitted to and agreed in writing by the Local Planning Authority. The approved details shall be implemented prior to the first occupation of development and thereafter maintained in an appropriate condition at all times in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

Reason

To minimise the impact of noise from plant and equipment affecting properties in the vicinity of the site in the interests of amenity.

Biodiversity Conservation Management Plan

38. Prior to the first occupation of the development hereby permitted a Biodiversity Conservation Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include specific information on the following:

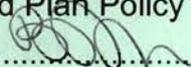
- management of New Spring Wood
- planting and management of hedgerows within the site
- the establishment and management of field margins within the site, including Rights of Way
- management of Dell Field and the Dell Pond
- proposed planting schemes for native trees and shrubs
- Dormouse mitigation strategy
- Song Thrush and Skylark mitigation strategy
- Badger mitigation strategy
- Bat mitigation strategy.

The approved Biodiversity Conservation Management Plan shall be implemented in full prior to the first occupation of the development. The Biodiversity Conservation Management Plan shall be monitored annually for a minimum of 5 years following occupation of the development and the outputs submitted to the Hertfordshire Biological Records Centre for review.

Reason

In order to prevent, mitigate and compensate for any harm to local biodiversity, in accordance with East of England Plan Policy ENV3.

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Surface Water Drainage

39. The development hereby permitted shall not be commenced until a detailed Surface Water Drainage Scheme for the site, based on the principles set out in the Flood Risk Assessment (FRA) for the site (Wormald Burrows Partnership dated May 2009) has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include a programme for the monitoring and maintenance of all components of surface water management. The drainage scheme shall be constructed and completed in accordance with the approved details prior to the first occupation of any part of the development.

Reason

To prevent increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance of the surface water drainage system, in accordance with East of England Plan (2008) Policy WAT4.

40. The surface water drainage scheme referred to in condition 39 shall include: (a) a clearly labelled drainage layout plan showing pipe networks and any attenuation ponds, soakaways and other SuDS features (b) details of the critical storm duration (c) calculations of on-site attenuation where this is achieved through attenuation ponds or similar (d) rates of discharge where an outfall discharge control device is proposed.

Reason

To prevent increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance of the surface water drainage system, in accordance with East of England Plan (2008) Policy WAT4.

41. The surface water drainage scheme referred to in condition 39 shall include calculations demonstrating how the system operates during a 1 in 100 year critical storm event, with appropriate allowance for climate change (refers to PPS25) and the details of the location of the overland flow paths, should overland flooding occur in the 1 in 100 year flood event.

Reason

To prevent increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance of the surface water drainage system, in accordance with East of England Plan (2008) Policy WAT4.

42. Prior to the commencement of development a Ground Investigation Report shall be submitted to and agreed in writing by the Local Planning Authority.

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Reason

To safeguard local ground conditions.

Infrastructure

43. Prior to the commencement of development details of infrastructure services (water, sewage, electricity, gas) shall be submitted to and approved in writing by the Local Planning Authority. Works shall be carried out in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

Reason

To ensure the timely provision of appropriate additional infrastructure, in accordance with East of England Plan (2008) Policy WAT2.

44. Prior to the commencement of development details of a Construction Code of Conduct / Environmental Management Plan shall be submitted to and agreed in writing by the Local Planning Authority. Development works shall be carried out in accordance with the approved Construction Code of Conduct / Environmental Management Plan throughout the life of development unless otherwise agreed in writing by the Local Planning Authority.

Reason

To ensure that construction is carried out in an acceptable manner and to safeguard residential amenity.

Archaeology

45. No development shall take place within the site until details of a programme of archaeological works have been submitted to and approved in writing by the Local Planning Authority. The approved programme shall be implemented prior to the commencement development.

Reason

To safeguard the historic environment in the vicinity of the site in accordance with East of England Plan (2008) Policy ENV6.

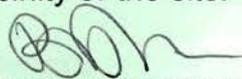
Hours of Operation

46. Prior to the first occupation of the development details of the proposed hours of opening of the school shall be submitted and approved in writing by the Local Planning Authority. The hours of opening shall not exceed the approved times unless otherwise agreed in writing by the Local Planning Authority.

Reason

In the interests of residential amenity in the vicinity of the site.

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Refuse facilities

47. Prior to the first occupation of the development, recycling and refuse facilities shall be provided in accordance with a scheme that shall first have been agreed in writing by the Local Planning Authority.

Reason

To ensure that adequate on-site refuse storage facilities are provided for the development in accordance with East of England Plan (2008) Policy WM6.

Summary of Decision

The application comprises inappropriate development in the Metropolitan Green Belt in terms of Planning Policy Guidance 2 (PPG2). PPG2 confirms that planning permission should not be granted for inappropriate development in the Metropolitan Green Belt except in very special circumstances. In this case the need for additional school places in north east Stevenage and the lack of suitable alternative sites are considered to constitute the very special circumstances needed to justify the granting of planning permission.

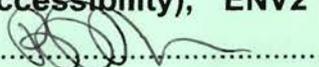
The Environmental Impact Assessment (EIA) identifies that bats and dormice would be affected, but that subject to the implementation of the measures set out in the Environmental Statement the impact would be satisfactorily mitigated. Consideration has been given to the Conservation (Natural Habitats Etc.) Regulations 1994. In accordance with these regulations the Local Planning Authority is satisfied that: (I) the development is of overriding public interest, (II) there are no satisfactory alternative sites, and (III) the favourable conservation status of the species will be maintained.

The proposal has been considered with regard to the policies of the Development Plan (East of England Plan May 2008, Minerals Local Plan (2007), Waste Local Plan (1999), and North Herts District Local Plan (1996; Saved Policies 2007) and other material planning considerations, and in particular, the need for additional school places in north east Stevenage and the lack of suitable alternative school sites.

The most relevant Development Plan policies relating to the development are:

East of England Plan (2008) Policies: SS1 (Achieving Sustainable Development), SV1 (Stevenage Key Centre for Development and Change), SS7 (Green Belt), H1 (Regional Housing Provision 2001 to 2021), T1 (Regional Transport Strategy Objectives and Outcomes), T2 (Changing Travel Behaviour), T3 (Managing Traffic Demand), T4 (Urban Transport), T8 (Local Roads), T9 (Walking, Cycling and other Non-Motorised Transport), T13 (Public Transport Accessibility), ENV2

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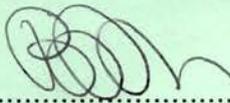
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(Landscape Conservation), ENV3 (Biodiversity and Earth Heritage), ENV5 (Woodlands), ENV6 (The Historic Environment), ENV7 (Quality in the Built Environment), ENG1 (Carbon Dioxide Emissions and Energy Performance), WAT1 (Water Efficiency), WAT2 (Water Infrastructure) and WAT4 (Flood Risk Management), and; North Herts District Local Plan (1996) Policies; 2 (Green Belt), 4 (North East Stevenage), 14 (Nature Conservation), 16 (Areas of Archaeological Significance and other Archaeological Areas), and 55 (Car Parking Standards).

Consideration has been given to national policy guidance in PPS1 (Delivering Sustainable Development), PPS7 (Sustainable Development in Rural Areas), PPG2 (Green Belt), PPG13 (Transport), PPG15 (Planning and the Historic Environment), PPG16 (Archaeology and Planning), PPG17 (Planning for Open Space, Sport and Recreation) and PPS25 (Development and Flood Risk).

The balance of the considerations having regard to the relevant planning and other material considerations is that planning permission should be granted.

Dated: 23rd day of April 2010

Signed: 

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