

Note on site BK3

1. Site 'BK3' is a proposed housing allocation in the emerging North Hertfordshire District Plan 2011-2031, currently at examination. BK3 is located in the parish of Barkway and adjoins the village of the same name in the rural east of the District. In the submitted Plan, BK3 has a dwelling estimate of 140 homes.
2. Since the site was selected in 2016 and the original hearing sessions were held in November 2017 and February 2018, the level of education provision available in the village has reduced.
3. Royston and the rural east of the district operates under a three-tier education system. This consists of First (Year R to Year 4), Middle (Year 5 to Year 8) and Upper (Year 9 and above) schools. The remainder of the District operates under a two-tier system of Primary (Year R to Year 6) and Secondary (Year 7 and above) schools (ED73, paragraph 6.46, p.81).
4. There is a First school in Barkway which, due to its small size, historically taught in mixed year groups whilst still catering for all years of first school provision. At the time of the original hearing, the village first school had federated with the school in neighbouring Barley, approximately 2½ miles away.
5. There is a reserve school site in Barkway, long held by Hertfordshire County Council after being compulsorily purchased. HCC have consistently stated through the Local Plan process that it would be prudent to retain the reserve school site to ensure future needs can be catered for. At the time of the plan's preparation, BK3 was anticipated to come forward towards the end of the Plan period (ED3, Appendix 2, p.19). The planning status of the reserve school site was discussed (along with other relevant matters) at the original hearing in February 2018.
6. Following this, the Inspector asked the Council to consider the status of this land (ED95). Further correspondence with HCC reiterated their request to retain the reserve school site (ED103). A main modification was proposed to expand BK3 to encompass the reserve school site with relevant criteria added to the policy (ED148A, MM216 & MM389).
7. However, since September 2018 the schools have implemented new arrangements whereby pupils are now taught in single age year groups with all Reception and Year 1 students from both villages taught at Barkway and Years 2, 3 and 4 in Barley.
8. This arrangement materially impacts upon the sustainability credentials of Barkway. As previously explained to the examination, the Villages for Growth were identified as those where more than 200 homes are proposed over the Plan period. Barkway was already the smallest of the proposed Villages for Growth whilst the remainder all benefit from a full range of primary school provision. The current arrangements mean that, uniquely within the District, only two years of primary education are currently provided within the village of Barkway with all other age groups required to travel for education purposes. This compares with five years' worth of education provision in locations with a First School catering for all year groups and seven years in locations with a Primary School.
9. Notwithstanding this, the reserve school site and / or any changes to the current school federation arrangements would potentially provide the opportunity to redress this balance over the course of the plan period and provide a suitably sustainable arrangement.
10. An outline planning application for the residential element of BK3 was received in June 2018 (NHDC reference 18/01502/OP).
11. HCC's response to this application in September 2018 showed that it did not trigger a definitive need to use the reserve school site at this time and that additional places might be provided in either Barkway (either at the existing first school or on the reserve school site) or Barley. Through the Development Management process it has also become more evident that, absent

- a requirement for the reserve school site to be utilised, there are significant concerns over the ability to satisfactorily integrate BK3 into the existing village in design and placemaking terms.
12. In the context of the above, and the Inspector's July 2019 letter seeking further information on the additional land allocated for development, NHDC officers wrote to HCC officers seeking clarification for plan-making purposes.
 13. A response has now been received (November 2020). This reiterates HCC's officer view that it would be prudent to retain the reserve school site for flexibility. It does not express a view on whether there is a reasonable prospect of the reserve school site being required in the period to 2031 as requested by the Council's letter. Nor does it indicate the conditions under which it might be required.
 14. Consideration has been given to amending the criteria of BK3 to link its delivery to delivery of the reserve school site. Similarly, it could be left to the Development Management process to determine the suitability of such arrangements on a case-by-case basis as and when any application(s) are determined over the Plan period. However, it seems likely on current information that these approaches could simply make the allocation undeliverable and therefore unsound. Leaving determination of this important issue to the Development Management process and Planning Committee would not represent plan-led development.
 15. Given this uncertainty, it is proposed that site BK3 (as proposed to be modified) should be considered for deletion and additionally excluded from the proposed village boundary.
 16. In this scenario, it is suggested that Barkway itself revert to its originally proposed 'Category A' status within proposed Policy SP2. Notwithstanding the matters above, it is considered that the advice in NPPF paragraph 55 on rural facilities and the evidence previously submitted to and considered by the examination continues to support this position in the settlement hierarchy and the principle of a modest level of development in Barkway. 'Category A' includes a range of village sizes including those of a comparable scale to Barkway.
 17. In terms of the other proposed allocations within the village, site BK1 has been developed and completed since the original hearings and it has been proposed this allocation is deleted (ED191B, paragraphs 14&15, p.3). It is proposed that Policy BK2 be retained. It is considered that this significantly lower level of development is commensurate to the likely sustainability credentials of Barkway over the period to 2031 and consistent with national policy as identified above.
 18. Other relevant references within the Plan to Barkway and / or its status would be modified as appropriate.
 19. The impact upon overall housing delivery and supply would be minimal. The removal of BK3 would not undermine (the principles of) any of the arguments presented in ED191B on these matters. The Plan would continue to demonstrate sufficient supply to meet the proposed amended requirement with an appropriate 'buffer' for flexibility. The Plan would also continue to demonstrate a five-year supply.
 20. It is considered that a decision to now advocate the removal site BK3 from the Plan should not have wider implications; it would be based upon a material change in the situation since the original hearing session in February 2018 that impacts upon the sustainability credentials of this site. Recent correspondence has not provided any clear indication that there may be a reasonable prospect of these concerns being addressed in the plan period to 2031. These are unique and very specific circumstances relating to schools' provision in Barkway that are not replicated at any other location in the District where development is being proposed.

Commented [NS1]: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality or rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby"
National Planning Policy Framework (2012 version)