

Examination of the North Hertfordshire Local Plan 2011-2031

Statement of Hertfordshire County Council (HCC) Property Development Services on behalf of HCC Services

Matter 10 – The housing allocations and the settlement boundaries: the Towns: Stevenage (Great Ashby)

10.20 Are all of the proposed housing allocations deliverable? In particular, are they:

c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

10.21 Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?

10.22 Are all of the proposed allocations the most appropriate option given the reasonable alternatives?

10.23(f) Are the proposed Green Belt boundaries consistent with the Plan's strategy for meeting identified requirements for sustainable development?

General response (applicable to all questions)

1. Hertfordshire County Council (HCC) considers that the housing allocations proposed at GA2, Stevenage (Great Ashby) are not deliverable as insufficient and inappropriate infrastructure is planned within the development and outlines its reasons for this below.
2. Policy SP18 allocates land for 600 dwellings and item (b) makes provision for 'up to four hectares of land for education, subject to up-to-date assessments of need, including, at minimum, 2FE of primary-age provision.'

Demographics and the anticipated pupil yield from new housing

3. NHDC has accepted HCC's pupil yield methodology used to underpin strategic planning for education provision, which uses a calculation of 500 homes equating to 1 form of entry (FE) of pupil demand.
4. The scale of new housing proposed in and around Stevenage equates to over 10,500 new dwellings within the Plan period. This includes new homes proposed by Stevenage Borough Council within its area, and new homes proposed within North Herts District Council and East Herts District Council on the boundary with Stevenage BC. Due to the proximity of the proposed developments within the wider Stevenage area, the nearest secondary schools to these new communities will be within Stevenage.
5. Using 1:500 as a basis to calculate the likely pupil yield, up to 21 forms of entry (10500/500) of new demand would be anticipated to arise from the scale of housing growth proposed. However, it is recognised that around 3000 new homes as part of SBC's town centre regeneration are likely to be flatted dwellings and, as such, likely to yield a lower ratio than 1:500.
6. More detailed pupil yield modelling work undertaken by HCC's Development Services which includes broad assumptions around mix and tenure and accounts for flatted dwellings within the town centre indicates total pupil yield arising from

the scale of new housing growth across the area as a whole to be in the region of 20 forms of entry. Because demand does not all arise at the outset, and for secondary education there is a 'lag' between new housing provision and peak educational demand, the demand profile is staggered over time.

7. It should be noted that HCC pupil forecasts only extend ten years; beyond which children requiring a secondary school place are not yet born. With the housing growth proposed within the Local Plan extending to 2031, the overall demand for 20 FE of additional provision is not expected to arise until 2038, beyond the lifecycle of HCC current pupil forecasts.
8. HCC current pupil forecasts indicate that by 2028/29 there will be a need for some 10FE of additional secondary provision as a consequence of the planned housing growth. However, neither the development, nor its pupil yield, will 'stand still' at that point and consideration therefore needs to be given at the planning stage (i.e. the point of allocation) to how the development will evolve in terms of its needs for supporting education infrastructure.
9. There is therefore a need to identify up to 20FE of additional secondary capacity to ensure future secondary education needs of Stevenage, including the new housing growth planned in and around the town within the Local Plan period, can be met.
10. Appendix A to this Matters Statement provides a table which summarises the latest forecast demand from the existing population and the anticipated demand from the proposed scale of housing on the borders of Stevenage based on the latest completion trajectory information as advised by Stevenage Borough Council, North Hertfordshire District Council (NHDC) and East Herts District Council. As the HCC pupil forecast only extends to 2028/29, the projected demand for later years within Appendix A assumes the existing population remains static.
11. Appendix A also outlines the proposed secondary education strategy to cater for the forecast demand as it arises. Whilst there is some identified latent expansion capacity available in existing schools within Stevenage (up to possibly 4FE maximum), this is insufficient to meet all the anticipated demand.
12. The County Council's strategy is to establish a new 6FE secondary school at the former Barnwell East site and 3FE expansion in existing schools, in the short to medium term. Even with this additional provision there is a projected shortfall of 1FE of secondary capacity by 2028/29. Assuming the existing population remains static beyond 2028/29 this deficit increases to just under 4FE as a result of yield from new housing growth by 2030/31, the end of the Local Plan period. This therefore demonstrates the need for further additional capacity within the plan period, which cannot all be met through identified latent capacity in the existing school estate.
13. To ensure sufficient secondary education capacity for the long term needs of the area an 8FE secondary school site in the north of the town is required to be allocated by NHDC within its Local Plan. The planning system is not structured so as to allow a 'second bite' to seek further infrastructure provision once development has been approved, and so the only opportunity to secure infrastructure needed for the development is at the outset when it is first

planned/permitted. In addition, in practical terms, once an area has been comprehensively developed, unless land is set aside for future expansion, there will be no easy way of providing additional infrastructure (such as a larger school) within an already developed area. Hence, good strategic planning requires provision to be made at the outset, to ensure the infrastructure is available for the long term needs of the area.

14. In addition to the issue of meeting longer term needs, Appendix B maps the current demographic analysis of the primary aged population across Stevenage alongside the locations of the proposed new housing growth.
15. There is currently no secondary school in the northern part of the town. Analysis confirms around 7FE of primary aged children currently living in the northern area. New housing to the north of the town within SBC and NHDC is anticipated to yield over 5.5FE of additional demand. Together, this equates to over 12FE of demand with no local secondary school to meet this need. Para 72 of the NPPF makes it clear that local planning authorities are expected to take a proactive, positive, and collaborative approach to meeting the requirement of ensuring that a sufficient choice of school places is available to meet the needs of existing as well as new communities. Para 157 of the NPPF indicates that a crucial role for a local plan is to plan positively for the infrastructure required in an area to meet the objectives, principles, and policies of the NPPF (which obviously includes para 72). NHDC's Local Plan therefore provides the appropriate opportunity to address the shortcomings of the existing distribution of secondary education provision in the area. Whilst HCC accepts that it cannot expect new development to meet/fund the cost of remedying existing deficiencies, that is not to say that the Local Plan should not be expected to include proposals to allow those deficiencies to be addressed.
16. In the central area, analysis suggests there is a good match between capacity and demand and, establishing a new secondary school at the former Barnwell East site will ensure sufficient capacity to meet the future needs arising from the southern area which includes Knebworth.
17. A new 8FE secondary school to north of Stevenage will provide for the needs of the existing and new communities living in this area and will facilitate a sustainable pattern of secondary schools across Stevenage to meet identified future need.

10.20 Are all of the proposed housing allocations deliverable? In particular, are they:

c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

Deliverability

18. NHDC have allocated 4 hectares of land for education in GA2 in the north, and 4 hectares of land for education in Knebworth at KB4 in the very south of the area.
19. It is not clear whether NHDC accepts the need for 8FE of additional secondary capacity to meet future demand from the wider area. HCC would request that the Planning Inspector seeks clarification from NHDC on this point.

20. Notwithstanding this, HCC considers that the housing allocation proposed at GA2 is not deliverable for the following reasons:

- i. Site GA2 provides insufficient land (up to four hectares) to meet the need for secondary school places arising from both the existing population and the proposed residential developments to the north of Stevenage. An 8 form of entry (FE) secondary school site is required with sufficient site to support it. Whilst there is no precise equation between a school size in terms of forms of entry and a site hectarage (because different configurations may be possible and the shape and topography of a site may influence the amount of built development and outdoor facilities it can accommodate), in broad terms HCC would expect an 8FE secondary school to require a site of some 8-10 hectares.
- ii. NHDC has proposed the land allocated for education purposes at GA2 should include, at a minimum, 2FE of primary aged provision. HCC's representations to NHDC's Local Plan have sought a new 2FE primary school site allocation to meet the needs from this development and demand within the surrounding area. The site area allocated for education at GA2 is insufficient for both 2FE primary and 8FE secondary provision. Indeed the PSE report commissioned by NHDC which considered site area requirement for schools concluded that *"only introduction of wider areas of all-weather surfaces or an extension to the site through inclusion of adjoining land would allow [a 2fe primary/4fe secondary] option to be pursued."* (Pg 19, PSE Consulting Limited, Report for North Hertfordshire District Council, 2017).
- iii. Sufficient land at GA2 is not available for a secondary school of this size as the majority of the site is to be allocated for housing; nor is it deliverable as highways advice indicates that the scale of the proposed housing development at GA2 and the traffic generation from it along with the impact of primary and secondary provision would put the existing highways infrastructure under considerable strain.
- iv. Site GA2 is not deliverable as, in light of the current residential allocation in the draft Local Plan, the alternative land value would be residential and therefore the land is too expensive for the County Council to acquire. It is therefore unaffordable as a secondary school site. Please refer to Paragraph 6 of the County Council's Matters 6 Deliverability Statement for the detailed reasons round affordability.
- v. Site GA2 is not deliverable as, notwithstanding the site and highways constraints, it does not support the County Council's model of secondary schools. Secondary schools of at least 6FE are large enough to support successful post-16 6th form provision, support financial sustainability and long term viability. 4FE 11-18 secondary schools face significant challenges in the current financial climate and are at a much greater risk of being unsustainable. The County Council, as local education authority with a statutory duty to ensure sufficient education provision is available to meet the needs of the population in its area, does not support the establishment of new 4FE secondary provision at either GA2 or KB4. The demonstrable need is to the north of Stevenage, not in Knebworth.

21. Please refer to Appendix C for the County Council's position statement on size of secondary schools.
22. A secondary school site search undertaken by HCC identified site GA2 as the most appropriate location for an 8FE secondary school, prior to it being designated for residential development by NHDC. With the site now allocated for housing, it is no longer available for delivering secondary school capacity. Following further site search activity, an alternative site has now been identified but this is not included in the Local Plan.
23. On the basis of insufficient and inappropriate secondary education infrastructure, HCC considers the proposed housing allocation to be undeliverable.

10.21 Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?

24. No. As outlined in the section above, HCC considers that the housing allocations are not justified and appropriate in terms of the likely impact upon the demand for secondary school places. A development which makes inadequate provision for education will fail to be sustainable.

10.22 Are all of the proposed allocations the most appropriate option given the reasonable alternatives?

25. No. The proposed allocations are not the most appropriate options because a site of sufficient size for an 8 form of entry secondary school needs to be allocated to the north of Stevenage to provide a sustainable pattern of secondary provision across the area and meet the demand for places. The justification for this is outlined in the section above. It would be a reasonable alternative to extend the extent of the allocation to ensure that an 8FE secondary school can be provided (in addition to the required primary school provision).
26. NHDC has proposed to meet the identified need for a further 8FE of secondary school provision through the allocation of two 4ha sites at Great Ashby (GA2) and Knebworth (KB4). This is not appropriate because of the weaknesses of providing for secondary education in schools that are not larger than 4FE.
27. Please refer to the Matters Statement (Knebworth) for the County Council's response to the 4 hectare site allocation for a 4FE secondary school in Knebworth.

10.23(f) Are the proposed Green Belt boundaries consistent with the Plan's strategy for meeting identified requirements for sustainable development?

28. No. The identified requirements include the necessary education infrastructure provision (see Policy SP10(e)). Those education requirements entail the provision of at least a 2FE primary school and a secondary school of 8FE. HCC does not understand how the allocation is large enough to accommodate the required education provision together with the planned 600 dwellings. Unless the scale of residential development is reduced, it will be necessary to increase the

size of the allocation. This will require a further adjustment to the proposed Green Belt boundaries to ensure that the allocation includes sufficient land to allow for all of the identified requirements to be provided.