

Examination of the North Hertfordshire Local Plan 2011-2031

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

Matter 11 – The housing allocations and the settlement boundaries: the Category A Villages: Knebworth

11.37 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?

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

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

11.40(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 proposed allocation of four hectares of land for education purposes at KB4 in Knebworth does not meet the identified demand for secondary school places in and around Stevenage.
2. Knebworth is included within the Stevenage secondary education planning area and included within the pupil forecasts for the area. There is no need for a secondary school in Knebworth. The demonstrable need for secondary school places is to the north of Stevenage and in Great Ashby, as outlined in Matters Statement 10 (Stevenage (Great Ashby)).
3. Knebworth is currently served by a 2 Form of Entry (FE) primary school, appropriately sized for the current population of this village. Traditionally, the majority of children in Knebworth attend a Stevenage secondary school or one of the single sex schools in Hitchin for their secondary education.
4. North Hertfordshire District Council (NHDC) has accepted HCC's pupil yield methodology used to underpin strategic planning which uses a calculation of 500 homes equating to 1FE of pupil demand.
5. 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.

6. Using 1:500 as a basis to calculate the likely pupil yield, up to 21FE (10500/500) of new demand is anticipated to arise from the scale of housing growth proposed. 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.
7. 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.
8. 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 20FE of additional provision is not expected to arise until 2038, beyond the lifecycle of HCC current pupil forecasts.
9. 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.
10. There is therefore a need to identify 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.
11. 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 new housing based on the latest completion trajectory information as advised by Stevenage BC, North Herts DC and East Herts DC on the borders of Stevenage. 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.
12. 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 this is insufficient to meet all the anticipated demand.

13. 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.
14. 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 North Herts District Council within their 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.
15. In addition to the issue of meeting longer terms needs, Appendix B maps the current demographic analysis of the primary aged population across Stevenage alongside the locations of the proposed new housing growth.
16. 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 & 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. Plan provision and the funding of provision are separate matters.

17. In the central area, analysis suggests there is a good match between capacity and demand. Barnwell School in Stevenage is the nearest secondary school for pupils living in Knebworth 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.
18. 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.
19. Establishing 4FE of secondary provision in Knebworth would create an imbalance in provision across Stevenage with over-capacity in the southern part of the town.
20. Notwithstanding over-provision in the south of the area, a new secondary school in Knebworth, would not fully meet the identified 8FE of demand from the wider Stevenage area. Due to its proximity to villages south of Knebworth and to the north of Welwyn Garden City, (Wewlyn, Oaklands & Mardley Heath, Codicote and Woolmer Green), children from these villages for whom a new school at KB4 would be their nearest, would gain a place based on distance before children living further away in Stevenage. See Appendix C for a map illustrating the proposed location of a new school in Knebworth and the communities which would be its nearest as the crow flies.
21. There is currently around 1FE of children living in these villages to the south of Knebworth and further new housing growth in these villages proposed by Welwyn Hatfield District Council in its Local Plan is likely to increase demand by a further 1FE. These communities traditionally look to Monks Walk school in the north of Welwyn Garden City for their secondary education and the County Council plans to manage the current and future demand from these villages within its secondary school strategy for Welwyn Garden City and this is taken into account within the Welwyn Hatfield Local Plan.
22. A new school at Knebworth would become the nearest secondary school for families living in these villages and applicants from this area would likely gain a place at secondary transfer over Stevenage children living further away. The impact of this changing pupil dynamic would need to be considered in the demand analysis across the wider Stevenage area, with up to an additional 2FE of capacity required to cater for this additional demand on top of the identified demand arising from within the Stevenage education planning area.
23. The site allocation at KB4 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.

24. Whilst HCC acknowledges that land use planning is a matter for NHDC, it is not, with respect, for NHDC to circumscribe the nature or form of educational facility or its location to meet identified need. NHDC has no responsibility to deliver educational outcomes and is not best placed to judge what forms of educational provision are appropriate to meet the identified needs of the developments in the wider Stevenage area.

25. Please refer to Appendix D for the County Council's position statement on size of secondary schools.

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

26. 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.

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

27. 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.

28. 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 only 4FE in size and the fact that a secondary school in Knebworth is in the wrong location to meet identified demand from the wider Stevenage area.

29. Please refer to the Matters Statement (Stevenage (Great Ashby)) for the County Council's response to the 4 hectare site allocation for a 4FE secondary school at GA2.

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

30.No. The identified requirements include the necessary education infrastructure provision (see Policy SP10(e)). Those education requirements entail the provision for new 8FE secondary provision at Great Ashby. As secondary education provision is not required in Knebworth an adjustment should be made to the proposed Green Belt boundaries to site KB4 to ensure that the allocation is reduced to exclude the land allocated for this requirement.