

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

REPRESENTATIONS ON:

**HERTSMERE LOCAL PLAN
SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES PLAN
(FOR SUBMISSION TO THE SECRETARY OF STATE)**

SEPTEMBER 2015

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1. INTRODUCTION

- 1.1. The following representations are made on behalf of Hertfordshire County Council Property (Development Services) in relation to the Hertsmere Borough Council (HBC) Site Allocations and Development Management Policies, submission to the Secretary of State. They represent the interests of various departments within Hertfordshire County Council (HCC), including Children's Services (CS), Health and Community Services, (HCS), Libraries and Community Protection.
- 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. Where relevant reference is made to the SADM Representation Form accompanying this document.

2. CHAPTER 2 HOUSING

- 2.1. The County Council notes that the adopted Core Strategy establishes the scale and distribution of housing development up to 2027, and that the approach is that the housing target is to be met in existing urban areas and other suitable locations. It is also noted that following examination the Area Action Plan (AAP) for the Elstree Way Corridor has been adopted.
- 2.2. **Policy SADM1 Housing Allocations** identifies 12 sites on which the principle of residential is acceptable, subject to compliance with site specific requirements identified. Specific representations are made with regard to site H6 Hertswood Upper School, Thrift Farm Lane, Borehamwood and H9 Former Sunny Bank School, Potters Bar. Response forms have been completed for each site and should be read alongside the following comments.

H6 Hertswood Upper School, Thrift Farm Lane, Borehamwood

- 2.3. Hertswood Academy is an 8FE (240 children per academic year) secondary school with activities on two sites approximately 600 metres apart from one another. The County Council understand that it is the Academy's aspiration to consolidate onto a single site, on the current Lower School at Cowley Hill. SADM1 site H6 would be redeveloped for residential to enable the redevelopment of the academy, theatre and sports centre at Cowley Hill. The allocation site H6 is set in the context of two planning applications which are pending consideration:

14/1766/FUL - Demolition of the existing school and sports centre buildings in a phased manner and the erection of a new Academy (Use Class D1) covering 12,005 sqm floor area, incorporating a new Theatre and Sports Centre fronting Cowley Hill.

14/1767/FUL - Demolition of existing school buildings (Use Class D1), Ark Theatre (Use Class Sui Generis) and 2 residential dwellings (Use Class

C3) and erection of 306 residential units. Hertswood School Thrift Farm Lane.

- 2.4. In terms of establishing the context it is also important to note that the existing Hertswood Academy accommodation allowed the school to admit up to 280 children per year, prior to the academy trust's decision to reduce the admission number to 240 for September 2014 onwards.
- 2.5. The County Council has a duty to secure sufficient school places in its area, ensuring that every child has access to a school place. The County Council 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.
- 2.6. While supportive of the Academy's aspirations to improve accommodation and provision at the school, HCC has concerns regarding the ability of the consolidated school site at Cowley Hill to meet the secondary educational needs in Borehamwood. In assessing the merits of the allocation (H6) it is necessary to understand both the primary and secondary school context within Borehamwood and the role of Hertswood Academy in meeting current and future education needs.
- 2.7. In the Borehamwood secondary school place planning area there are currently 13 forms of entry (fe)¹. The latest secondary education forecasts indicate that there will be a shortage of 0.6fe in 2017/18 and that this will continue to rise to a peak in 2023/24 of 2.6fe.

BOREHAMWOOD

| | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 |
|-----------------------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| Number of Year 7 places available | 390 | 390 | 390 | 390 | 390 | 390 | 390 | 390 | 390 | 390 | 390 |
| Demand | 392 | 388 | 407 | 429 | 439 | 445 | 447 | 464 | 469 | 436 | 461 |
| Surplus/Shortage | -2 | 2 | -17 | -39 | -49 | -55 | -57 | -74 | -79 | -46 | -71 |
| % Surplus/Shortage | -0.5% | 0.5% | -4.4% | -10.0% | -12.6% | -14.1% | -14.6% | -19.0% | -20.3% | -11.8% | -18.2% |
| No of FE | -0.1 | 0.1 | -0.6 | -1.3 | -1.6 | -1.8 | -1.9 | -2.5 | -2.6 | -1.5 | -2.4 |

- 2.8. There are only two secondary schools located within the Borehamwood secondary school place planning area. These are Yavneh College, a 5fe faith school, and Hertswood Academy at 8fe. Due to the admissions criteria for Yavneh College expansion capacity to meet the needs of the town can only be accommodated at Hertswood.
- 2.9. The government has given approval to a new free school, Harperbury Free School, to open as a 4fe secondary school. However, a funding agreement has not yet been signed and there is ongoing uncertainty regarding when and if the school will open, which means that its impact on the Borehamwood area cannot

¹ One form of entry is 30 places. 13 forms of entry is the equivalent of 390 school places per year group.

be accurately predicted. Although the school's stated admission criteria includes Borehamwood within its "priority area", parts of other settlements such as Radlett, Shenley and London Colney, are geographically closer to the preferred permanent location, and children living in these areas may therefore have a higher priority for the available places. Consequently, the impact of this new school, if and when it opens, may have a very limited impact on the secondary school place position in Borehamwood.

- 2.10. Although the need for primary school places in Borehamwood is examined in detail in paragraphs 5.7-5.14 of this response, in the context of the proposed allocation H6 it should be noted that there is recognition in the adopted Core Strategy, that a site for a new 2fe primary school is required in Borehamwood within the plan period². A reserve site for a new 2fe primary school has been identified within the Elstree Way Corridor AAP; however the SADM plan identifies that an alternative site would be preferred. Paragraph 5.21 of the SADM notes that there 'may be an opportunity to provide a new primary school on land immediately adjacent to the development envelope of Hertswood Academy', but this is not shown on the policies map and is understood to refer to a site within the Green Belt. The Council's preference to find an alternative site is articulated in SADM plan, although a specific site has not been identified in the Document.

Redevelopment of the Northern School and Southern School sites

- 2.11. The allocation H6 must be considered in the context of an increasing need within Borehamwood for both primary and secondary school capacity as set out above. The County Council has considered the proposals to rebuild Hertswood Academy on the Lower School (northern) site and for the redevelopment of the Upper School (southern) site for residential. Although the County Council would support in principle Hertswood Academy's aspiration to provide new built facilities and the consolidation of the school onto one site, the plans as presented represent a loss of education land.
- 2.12. The design and access statement which accompanies the application for the consolidated school at Cowley Hill (14/1766/FUL) sets out the proposed gross internal floor area is larger than the Building Bulletin 103 standard due to the "higher than average level of community use" and re-provision of theatre and sports centre, rather than expansion capacity to meet future need as had previously been indicated.
- 2.13. As Hertswood is the only school that could facilitate the required secondary expansion need in Borehamwood assurances are required that the school can accommodate the future secondary school needs. Alternatively additional education land is required to mitigate the loss of land at the Upper School (southern).

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| <p>See SADM Response Forms: Response form 1: SADM1 Housing Allocations (H6)</p> |
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² Local Plan Core Strategy DPD adopted 2013: Table 5 Spatial Objectives by settlement (Borehamwood)

H9 Former Sunny Bank School, Potters Bar

2.14. The County Council welcomes the allocation of the former Sunny Bank school site for residential development but objects to the requirement that open space be provided. Both Policies **SADM1 Housing Allocations** and **SADM33 Key Community Facilities** require 1.4ha (half of the site) to be designated as public open space; and, for the developer to make a contribution towards the cost of implementation and maintenance of this open space.

2.15. The County Council notes the Council's justification for the requirement as outlined within the Review of Selected Green Belt Sites and Boundaries (March 2014)³ and the Summary of Public Consultation (Volume 2: Consultation Draft March 2014). It is within the latter document that the Council states that:

The retention of a significant area for public open space remains a priority wherever the Green Belt boundary is drawn and the introduction of built development to the whole or significantly increased area of the site than that specified in H9 would not be supported.

2.16. It should be noted that the site has never been open to the public and has not been identified as either public playing fields or designated open space within the Council's assessments/studies. The site did not form part of the HBC Open Space Study (2011)⁴ as it was considered 'derelict or no longer in use'. The site was also not included within The Green Spaces and Amenity Land Report (2012)⁵ which assessed green spaces across the borough. The omission from the Green Spaces and Amenity Land Report is of specific significance as one of the aims of the assessment was to 'review existing urban open land sites for future designation or re-allocation' in advance of the Site Allocations and DM policies plan.

2.17. When the County Council put the site forward for housing through the SHLAA (2009) 1.84ha of the total site (2.87ha) was identified for housing. The developable area was revised down to 1.4ha within the SHLAA, and within the SADM an arbitrary requirement has been placed on the developer to provide the remaining 1.4ha as public open space at a cost to the developer.

2.18. At the time of SHLAA submission it was understood that there would be no education use remaining on the site. This is no longer the case and the Education Support Centre (ESC) is to remain, occupying 0.60ha of the site.

³ Review of Selected Green Belt Sites and Boundaries Assessment for Site Allocations and Development Management Policies (March 2014) <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Development-Framework/Review-of-Selected-Green-Belt-Sites-and-Boundaries.pdf>

⁴ Open Space Study (2011) <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Development-Framework/Hertsmere-Open-Space-Study-Oct-2011.pdf>

⁵ The Green Spaces and Amenity Land Report (2012) <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Plan/Green-Spaces-Report-Dec-2012.pdf>

- 2.19. As an education use is to remain on the site it is considered that the requirement for 1.4ha to be provided as public open space is disproportionate. Such a requirement will undermine the deliverability for the site for residential development. It is estimated that with the open space requirement a developable area of 0.84ha remains.
- 2.20. The County Council is not opposed to the provision of open space within a considered residential scheme however a requirement for 1.4ha of the site to be public open space is disproportionate, excessive and unjustified. The requirement on the Sunny Bank site is in conflict with **Policy SADM38 New and Improved Public Open Spaces** which requires developments in excess of 50 residential units or 2,500 sq.m gross external floorspace to provide public open space.
- 2.21. Figure 5.1 of the HBC Open Space Study (2011)⁶ illustrates the accessibility deficiencies of outdoor sport facilities in Hertsmere. The document summaries that there are deficiencies in accessing outdoor sport facilities in East of Potters Bar. Sunny Bank is located in the south of town in an established residential area and separated from east Potters Bar by the railway line. It is difficult to conclude that outdoor sport facilities in this location can in anyway satisfy this need.
- 2.22. It should be noted that there is no requirement for public open space to be provided on other housing sites including Hertswood Upper School, site H6. It is not normal practice that where a piece of land is to be removed from the Green Belt in order to allow residential development, this can only be acceptable where a disproportionate level of open space is provided on the site. It is not considered that the SADM identifies any special circumstances in this case where removal of the land from the Green Belt can only be justified if it provides a disproportionate amount of open space.
- 2.23. Such a requirement will stymie development on the site, and therefore HCC object to both Policy SADM1 (H9) and Policy SADM33 (C1) on the grounds of soundness to Policy SADM1 (H9) as it is neither justified nor effective.

See SADM Response Forms:

Response form 2: SADM1 Housing Allocations (H9)

Response form 3: SADM33 Key Community Facilities (C1)

3. CHAPTER 3 EMPLOYMENT AND ECONOMY

- 3.1. HCC has no comments to make on this chapter.

⁶ Open Space Study (2011) <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Development-Framework/Hertsmere-Open-Space-Study-Oct-2011.pdf>

4. CHAPTER 4 OPEN LAND AND THE ENVIRONMENT

Green Belt

- 4.1. **Policy SADM23 Green Belt Boundary** and supporting paragraph 4.76(b) recognises that the Former Sunny Bank School, Potters Bar (Site H9) is to be removed from the Green Belt. As stated, the removal of the site from the Green Belt and allocation for residential development is welcomed. However as stated in paragraph 2.14 of this response the County Council objects to the requirement for 1.4ha of the site to be designated as public open space.

See SADM Response Forms:
SADM Response form 4: paragraph 4.76(b)

- 4.2. **Policy SADM24 Village Envelopes** identifies areas in service villages (Elstree, Shenley and South Mimms) where small-scale development may be appropriate. The presence of a Green Belt designation washing over sites being used for education acts as a constraint and obstacle in being able to respond to the need to provide new, or to enhance existing facilities.
- 4.3. The inclusion of the built area of St Nicholas Elstree C of E VA Primary School Elstree within the village envelope is welcomed. However, the County Council considers that the envelope should also include the playing fields of the school.
- 4.4. The inclusion of the Shenley Primary School site within the village envelope is supported.
- 4.5. The South Mimms village envelope as defined by the policies map excludes St Giles C of E Primary School in Blanche Lane, South Mimms. The County Council considers that the school site should be included within the village envelope.

See SADM Response Forms:
SADM Response form 5: SADM24 Village Envelopes (Elstree)
SADM Response form 6: SADM24 Village Envelopes (South Mimms)

- 4.6. **Policy SADM25 Key Green Belt Sites** identifies a series of Green Belt sites which contain a significant amount of buildings, the use of which are recognised as being important and should be maintained and supported. The County Council welcomes the recognition of the following education facilities as being Key Green Belt sites:

- The Bushey Academy, London Road, Bushey;
- Bushey Meads School, Coldharbour Lane, Bushey;
- Dame Alice Owen's School, Sawyers Lane, Potters Bar;
- Hertswood Lower School, Cowley Hill, Borehamwood; and,
- Queen's School, Aldenham Road, Bushey;

- 4.7. However, the effectiveness of policy SADM25 is hindered by the current site infill boundaries. As drawn these boundaries would not support the expansion potential of the schools, as they do not offer any flexibility to meaningfully develop the sites. The infill boundaries appear arbitrary, for instance it is unclear why the area to the front of Bushey Meads School is not within the infill area, as it is hard to see how development of this area would affect the openness of the Green Belt. There also appears to be an inconsistency in the approach to the drawing of the infill boundary. The infill boundary at Hertswood School includes an area of undeveloped land between the built form and the football pitch used as informal recreation while at Bushey Academy the boundary is tightly drawn around the central building.
- 4.8. As presented the County Council considers that the Policy SADM25 Key Green Belt Sites is unsound on the grounds that it will not effectively allow for the development required to ensure that there are sufficient secondary school places within the Borough. The County Council therefore seeks the redrawing of the infill boundaries of the above mentioned schools and suggests that consideration is given to the inclusion of areas of hardstanding.

See SADM Response Forms:

SADM Response form 7: SADM25 Key Green Belt Sites

5. CHAPTER 5 BUILDING SUSTAINABLE COMMUNITIES

Key Community Facilities

- 5.1. The Council's approach to community facilities as outlined in **Policy SADM33 Key Community Facilities** and supporting text is noted. The County Council also notes that the policy has changed significantly from the earlier draft of the plan and additional criteria have been included within policy SADM33.
- 5.2. Paragraph 5.22 states that the Council recognises the need identified by the education Authority for two more forms of entry at primary school level in Borehamwood. The paragraph goes on to state that the case for a new site is unclear given the potential capacity of existing one form entry schools in the area to expand and the possible establishment of new Free Schools.
- 5.3. It should be noted that the Core Strategy sets out the strategic objectives and spatial strategy for the area and it is within this document that the need for a new primary site has been established. The recently adopted Elstree Way Corridor Area Action Plan (AAP) also recognises the need for a new 2fe primary school within Borehamwood.

Hertsmere Local Plan Core Strategy (adopted February 2013)

Table 5 Spatial Objective: "Provide a new 2.5 hectare primary school site"

Elstree Way Corridor Area Action Plan (adopted July 2015)

Paragraph 4.11: "To support the level of development proposed for Borehamwood as defined by the Core Strategy, a site for a new 2 form entry Primary school is required within Borehamwood."

- 5.4. There is an established requirement within the Core Strategy for a new primary school site. To ensure conformity with the Core Strategy the County Council considers that clarification is required within paragraph 5.22 that the recognised need for "two more forms of entry at primary school level in Borehamwood" is in the form a new primary school site.

See *SADM Response Forms*:
Response form 8: Paragraph 5.22

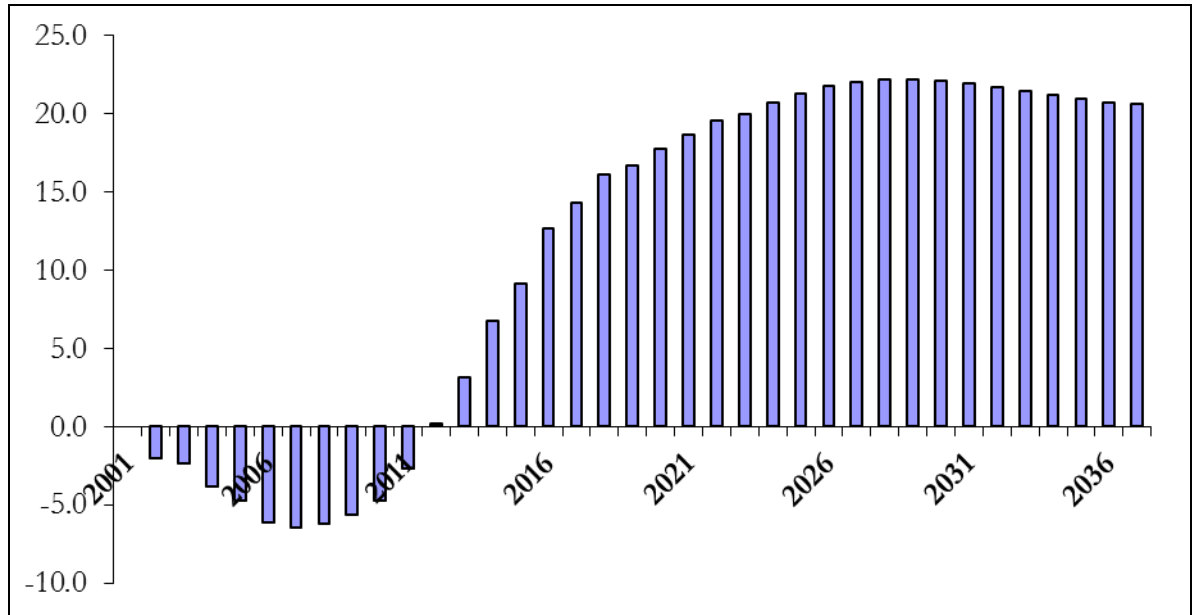
- 5.5. It is unclear why the SADM plan in paragraph 5.22 and subsequently in **Policy SADM33 Key Community Facilities (v)** is seeking to introduce a requirement to demonstrate the already established 2fe primary school need. Policy SADM33 states that in the case of new schools, proposal will only be supported if there is a clear need for the provision of additional capacity which cannot be met through the expansion of existing schools. It is noted that this requirement has been introduced within this draft of the plan and did not feature in the earlier draft of the SADM plan (formally Policy SADM29).
- 5.6. The Council's intention behind the introduction of this requirement is unclear. It is considered that the requirement is in conflict with Core Strategy Policy CS19 Community Facilities and in particular supporting text paragraph 6.5 which states that the "Council is committed to promoting, providing or facilitating the provision of key community facilities and a clear presumption in favour of supporting such uses is considered to be of paramount importance". A requirement to demonstrate that the provision of additional capacity cannot be met through the expansion of existing schools is neither effective nor consistent with national policy. Academies and Free Schools are run by a governing body and are independent from the local authority. A requirement to demonstrate provision cannot be met through the expansion of existing schools is not effective as the Local Education Authority cannot require schools independent from it to accommodate growth.

See *SADM Response Forms*:
SADM Response form 9: SADM33 Key Community Facilities (v)

The need for primary school places in Borehamwood

- 5.7. Although the County Council considers that the need for a new 2fe primary school in Borehamwood has been established the following contextual information is provided on the need for these places.

5.8. Borehamwood is an area which has seen sustained growth in primary population and demand for school places. This is exemplified by the graph below, showing the cumulative percentage change in ONS Estimated Primary Pupil Numbers for Hertsmeire Borough.



5.9. In response to rising demand, the County Council has already provided an additional 525 permanent primary school places in Borehamwood since September 2009 through enlargement of existing schools. Including a 1fe permanent expansion at Summerswood Primary, a 1fe permanent expansion at Parkside Community Primary School and a three additional classroom permanent expansion at Cowley Hill Primary School. Despite this, further places are needed in the short to medium term to cater for latent demand. The latest primary school forecast for Borehamwood indicates that there is an existing shortage of approximately 1fe within the town.

BOREHAMWOOD

| | 2015/16 | 2016/17 | 2017/18 | 2018/19 |
|--------------------------------------|---------|---------|---------|---------|
| Number of reception places available | 420 | 420 | 420 | 420 |
| Demand | 407 | 442 | 391 | 444 |
| Surplus/Shortage | 13 | -22 | 29 | -24 |
| % Surplus/Shortage | 3.1% | -5.2% | 6.9% | -5.7% |
| No of FE | 0.4 | -0.7 | 1.0 | -0.8 |

5.10. Paragraph 5.22 of the SADM plan cites the possible establishment of new free schools within Borehamwood and raises the question as to whether a site for a new primary school is still required. The County Council is aware of proposals for two new free schools in Borehamwood, both applications for 2fe primary schools. However, only one, Yavnah Primary School, has been given approval by the Department for Education to proceed to the pre-opening phase.

5.11. The Yavnah Primary School proposal is for the creation of a faith school and the admission criteria would prioritise students of Jewish faith. In recent years the

number of children leaving Borehamwood to attend Jewish schools has averaged over 100 children per year. The Children's Services forecast reflects that movement trend and so the forecast shortage of places within Borehamwood is over and above that the demand for Jewish faith places. It does not follow therefore that an increase in faith-based school provision would necessarily change the need for non-faith based provision; Jewish families may simply secure places at new provision within the town rather than travelling out of Borehamwood to neighbouring areas.

- 5.12. The SADM plan cites existing capacity in current 1fe schools in Borehamwood as a reason for the 'uncertainty' for the requirement for a new primary school site. Appendix B includes a table of the known expansion potential of existing schools in Borehamwood based on current feasibility evidence. It shows that, subject to additional feasibility testing and planning approval, there may be between 2fe and 3fe of potential capacity in existing primary schools in the town.
- 5.13. In recent years several schools in Borehamwood have been enlarged to meet rising demand in the area. Further permanent expansion potential is limited, not guaranteed and would mean that there would be no capacity left within the town. If the population continues to grow building new schools will be the only option available to ensure places are locally available for Borehamwood residents. Given the significant disparity between birth/application numbers and those attending primary school within Borehamwood, with well over 600 Borehamwood children typically registered with GPs and only 420 reception places within the town year on year, it is prudent to maintain some expansion potential to meet sudden or rising demand from changes to trends or demographics.
- 5.14. Should it be found following feasibility work that there are two existing primary schools in the required location (in close proximity to the Elstree Way Corridor) which can accommodate an increase of 1fe permanent expansion there would be no capacity to provide additional places if the population continues to grow beyond the forecast period, as the ONS figures project. The need for a new 2fe is established and remains. While there is believed to be some limited opportunities to expand existing schools, a reliance on these sites to deliver the necessary primary school capacity presents a serious risk to the delivery of development within Borehamwood during the plan period.

Maxwell Park

- 5.15. A reserve site for a new primary school has been identified within the Elstree Way Corridor AAP. However, the SADM plan identifies that an alternative site would be preferred, although it is noted that a specific site has not been identified. Paragraph 5.21 of the SADM notes that there 'may be an opportunity to provide a new primary school on land immediately adjacent to the development envelope of Hertswood Academy', but this is not shown on the policies map and is understood to refer to a site within the Green Belt. Failure to identify an alternative site for a primary school will mean that the Maxwell Park site will need to be relied upon and made available for school provision. The County Council considers that it would be very difficult to demonstrate the 'very

special circumstances' to enable an alternative site in the Green Belt to be promoted alternatively as a primary school when a reserve site has already been identified within the urban area of Borehamwood.

The need for primary school places in Bushey

- 5.16. There has been an increase in demand for primary school places in Bushey as a result of development⁷ and a general increase in population. The increase has led to a series of temporary expansions to existing schools in recent years. Further expansion of existing schools is severely limited and it is likely that the potential level of future demand will not be able to be met by enlargement of existing primary schools in Bushey. Feasibility to assess options for additional primary school places is to be undertaken and it would now be prudent to identify a site for a new primary school to serve Bushey through the plan period.

The need for secondary school places in Bushey

- 5.17. There has been a significant increase in forecast demand for secondary school places in the Bushey and Radlett planning area. Further feasibility to assess how this demand might be met is currently being undertaken. However, it is extremely unlikely that the level of forecast demand can be met through expansion of existing secondary schools within the area. The identification of a site for a new secondary school may be required to meet forecast demand within the area.

6. CHAPTER 6 TRANSPORT AND PARKING

- 6.1. HCC Property has no comments to make regarding this chapter.

7. CHAPTER 7 TOWN CENTRES AND SHOPPING

- 7.1. **Policy SADM43 Town and District Centres** states that the council will support proposals to improve the facilities, functions and environments of town and district centres as identified on the Policies Map. Policy SADM43 provides specific requirements for the Radlett Service Station/Regency House, Former Fire Station and Burrell & Co (TC2) sub area of Radlett Watling Street District Centre. The Council's intentions behind the requirement for former community uses on the site to be provided on the site are unclear. There are not considered to be any community facilities in this location.
- 7.2. Should it be the intention to identify the former Radlett Fire Station as a former community use the County Council directs HBC to the recent Appeal Decision (APP/N1920/A/12/2186478) in respect of the former Radlett Fire Station. Hertsmere Borough Council required the re-provision of "community facilities" where actually there was no use by the community. In allowing the appeal the inspector was very clear in her opinion that the fire station was not a community

⁷ Hertsmere Authority Monitoring Report 2013/14: Paragraph 3.3 states Bushey accommodated the most (41%) new homes in 2012-14

facility. The County Council requests the deletion of the following words from Policy SADM43 (TC2): “Community uses required on part of the site to replace former community use”.

See SADM Response Forms:

SADM Response form 10: SADM43 Town and District Centres (TC2)

8. CHAPTER 8 IMPLEMENTATION AND MONITORING FRAMEWORK

8.1. HCC Property has no comments to make regarding this chapter.

9. CONCLUSION

9.1. HCC Property, together with the County Council services represented, welcome the consultation and hope that the above comments and information are helpful.

9.2. However, the County Council has a series of concerns and considers that currently the SADM plan is unsound. These concerns are articulated on the relevant response forms referred to within these representations. The County Council is committed to working with the Borough Council to address the soundness issues raised, and where appropriate would seek to enter statements of common ground. Officers from HCC (Development Services) consider that it would be helpful to meet to discuss the issues outlined in this response.

9.3. The County Council (Development Services) requests that it be represented at any oral part of the Examination into this plan to hear discussions on the matters raised; to represent HCC’s property and service interests; to present relevant evidence and to participate in any debate.

Appendix A: List of Response Forms

The following response forms have completed and should be read alongside this submission:

- Response form 1: SADM1 Housing Allocations (H6)
- Response form 2: SADM1 Housing Allocations (H9)
- Response form 3: SADM33 Key Community Facilities (C1)
- Response form 4: Paragraph 4.76(b)
- Response form 5: SADM24 Village Envelopes (Elstree)
- Response form 6: SADM24 Village Envelopes (South Mimms)
- Response form 7: SADM25 Key Green Belt Sites
- Response form 8: Paragraph 5.22
- Response form 9: SADM33 Key Community Facilities (v)
- Response form 10: SADM43 Town and District Centres (TC2)

Appendix B: HCC Education Statement August 2015

1.0 Introduction

- 1.1 To assist with interpreting the information provided, the background to the current situation regarding school places within the Borough, 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 in the normal admissions round for all maintained and academy schools
 - 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/risingdemand/>

Forecasts

- 1.6 HCC produces pupil forecasts every six months 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.
- 1.7 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 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 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 is 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.

Detached Playing Fields

- 1.21 A school should have all of the facilities it requires, including playing fields, provided on a single site.
- 1.22 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

- 1.23 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

- 1.24 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 Hertfordshire. 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.
- 1.25 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

- 1.26 For the purposes of school place planning, Hertfordshire County Council 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.
- 1.27 A series of primary education planning areas cover the borough. The table below shows the settlements referred to in the Local Plan Core Strategy (Table 6. The Settlement Hierarchy) with their respective Primary Planning Area.

| Settlement | Primary Planning Area |
|-------------------|------------------------------|
| Borehamwood | Borehamwood |
| Potters Bar | Potters Bar |
| Bushey | Bushey |
| Radlett | Radlett |
| Shenley | Shenley |
| Elstree | Borehamwood |
| Aldenham | Radlett |
| Letchmore Heath | Radlett |
| Patchetts Green | Bushey |
| Ridge | Potters Bar |
| South Mimms | Potters Bar |

Borehamwood

- 1.28 Covering both Borehamwood and Elstree, there are 10 primary schools - Cowley Hill (2 FE) Kenilworth Primary (1 FE) Meryfield Community Primary (2 FE) Monksmead (1 FE) Parkside Community (2 FE) Saffron Green (1 FE) St. Theresa's RC (1 FE) Summerswood Primary (2 FE) Woodlands Primary (1 FE) and St. Nicholas Elstree C of E (1 FE).

NB: All schools except St Nicholas are located in the settlement of Borehamwood.

| Borehamwood PPA | 2016 PAN | 2015/16 Forecast | 2016/17 Forecast | 2017/18 Forecast | 2018/19 Forecast |
|-----------------|----------|------------------|------------------|------------------|------------------|
| Total | 420 | 407 | 442 | 391 | 444 |
| + 5% Margin | | 427 | 464 | 410 | 466 |

- 1.29 There are considered to be limited opportunities for permanent expansion to support the level of proposed development within the plan period. Kenilworth Primary and Monksmead are considered to have an additional 1FE of additional expansion capacity each. However, the recent decision regarding the provision of a 2fe primary school at Yavneh College adjacent to Monksmead may impact on the ability of this school to expand. The latest forecast indicated the need for an additional 1FE-2FE provision for September 2016 and additional 1FE-2FE additional places for September 2018. The Core Strategy recognises the need for a new 2FE primary school site in Borehamwood, the Elstree Way Corridor AAP identifies Maxwell Park as a suitable location for a school in the event that an alternative site cannot be found.

Radlett

- 1.30 There are four primary schools in Radlett PPA and 1 junior school - Fair Field Junior (2 FE) Hertsmere Jewish Primary (2 FE) Newberries Primary (1 FE) St. John's C of E (2 FE) and St. John's RC (2 FE)

| Radlett PPA | 2016 PAN | 2015/16 Forecast | 2016/17 Forecast | 2017/18 Forecast | 2018/19 Forecast |
|--------------|----------|------------------|------------------|------------------|------------------|
| Total | 150 | 139 | 142 | 128 | 97 |
| + 5% Margin | | 146 | 149 | 134 | 102 |

- 1.31 There is considered to be sufficient capacity within the existing schools to support the identified development within Radlett.

Shenley

- 1.32 There are two primary schools in Shenley PPA – Clore Shalom (1 FE) and Shenley Primary (1.5 FE).

| Shenley PPA | 2016 PAN | 2015/16 Forecast | 2016/17 Forecast | 2017/18 Forecast | 2018/19 Forecast |
|--------------|----------|------------------|------------------|------------------|------------------|
| Total | 75 | 100 | 67 | 56 | 99 |
| + 5% Margin | | 105 | 70 | 59 | 104 |

- 1.33 Shenley Primary School is at capacity.

Potters Bar

- 1.34 There are six primary schools in Potters Bar PPA - Cranbourne Primary (2 FE) Ladbrooke JMI (1 FE) Oakmere Primary (2 FE) Pope Paul RC (1 FE) The Wroxham (1 FE) and St. Giles C of E (0.5 FE)

| Potters Bar PPA | 2016 PAN | 2015/16 Forecast | 2016/17 Forecast | 2017/18 Forecast | 2018/19 Forecast |
|-----------------|----------|------------------|------------------|------------------|------------------|
| Total | 255 | 225 | 211 | 222 | 213 |
| + 5% Margin | | 236 | 222 | 233 | 224 |

- 1.35 There is considered to be sufficient capacity within the existing schools to support the identified development within Potters Bar.

Bushey

- 1.36 There are seven primary schools in Bushey PPA and 1 junior school - Ashfield Junior (2 FE) Bournehall Primary (1 FE) Bushey Heath Primary (1 FE) Hartsbourne Primary (1 FE) Highwood Primary (2 FE) Little Reddings (2 FE) Merry Hill (2 FE) and Sacred Heart RC (1.3 FE).

| Bushey PPA | 2016 PAN | 2015/16 Forecast | 2016/17 Forecast | 2017/18 Forecast | 2018/19 Forecast |
|--------------|----------|------------------|------------------|------------------|------------------|
| Total | 310 | 373 | 329 | 286 | 307 |
| + 5% Margin | | 392 | 346 | 300 | 322 |

- 1.37 Demand for primary school places in Bushey has increased as a result of both recent development and demographically as a result of an increase in population reflecting the popularity of the settlement and wider area.
- 1.38 Further expansion of existing schools in Bushey is considered to be severely limited. It is likely that the potential level of future demand may not be able to be met at existing schools in Bushey. Feasibility to assess options for additional primary school places is to be undertaken and this may require the identification of a site for a new primary school to serve Bushey.

School Place Planning - Secondary

- 1.39 The following information is an analysis of the current position regarding secondary school places using CS planning areas. Secondary school sites are 6 to 10 FE in size, with stay on rates for sixth form of over 60%. The secondary forecasts are given below. The information is based upon what is shown in existing CS forecasts to 2024/25.

Borehamwood

- 1.40 In the Borehamwood school place planning area there are currently 13 forms of entry (FE). These include Hertswood (8FE) and Yavneh College (5FE).

| Secondary Planning Area | 2016 PAN | 2016/17 Forecast | 2017/18 Forecast | 2018/19 Forecast | 2019/20 Forecast | 2020/21 Forecast | 2021/22 Forecast | 2022/23 Forecast | 2023/24 Forecast | 2024/25 Forecast |
|-------------------------|----------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| Borehamwood | 390 | 388 | 407 | 429 | 439 | 445 | 447 | 464 | 469 | 436 |
| + 5% margin | | 407 | 427 | 450 | 461 | 467 | 469 | 487 | 492 | 458 |

- 1.41 The Secondary education need in Borehamwood is considered in detail in the main body of this response.

Bushey

- 1.42 There are three secondary schools in Bushey totalling 22.5FE. Queens (8.8FE), Bushey Meads (6.7FE⁸)* and Bushey Academy (7FE).

| Secondary Planning Area | 2016 PAN | 2016/17 Forecast | 2017/18 Forecast | 2018/19 Forecast | 2019/20 Forecast | 2020/21 Forecast | 2021/22 Forecast | 2022/23 Forecast | 2023/24 Forecast | 2024/25 Forecast |
|-------------------------|----------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| Bushey | 675 | 687 | 724 | 752 | 779 | 788 | 811 | 858 | 847 | 813 |
| + 5% margin | | 721 | 760 | 790 | 818 | 827 | 852 | 901 | 889 | 854 |

- 1.43 The forecast includes the proposed expansion of Bushey Meads School, subject to town planning permission, from 5.7fe to 6.7fe. As illustrated above, future demand significantly exceeds supply.

- 1.44 All schools in Bushey are Academies and the Local Authority has no responsibilities towards these schools. The diversity of provision, the popularity of schools and the proximity of the county boundary makes the planning of school places in this area particularly complex.

- 1.45 Further feasibility to assess how this demand might be met is currently being undertaken. However, it is extremely unlikely that the level of forecast demand can be met through expansion of existing secondary schools within the area. The identification of a site for a new secondary school may be required to meet forecast demand within the area across the plan period.

⁸ The stated 6.7fe at Bushey Meads is post expansion, at the time of the preparation of this response the application (15/1212/FUL) for the expansion of Bushey Meads remains pending consideration. An earlier application (14/1432/FUL) to expand the school was refused.

Potters Bar

- 1.46 In Potters Bar there are two schools Dame Alice Owen's (6.7FE) and Mount Grace (5.8FE) providing a total of 12.5FE. Although outside of the borough Chancellor's Secondary School (6FE) is included within the Potters Bar planning area.

| Secondary Planning Area | 2016 PAN | 2016/17 Forecast | 2017/18 Forecast | 2018/19 Forecast | 2019/20 Forecast | 2020/21 Forecast | 2021/22 Forecast | 2022/23 Forecast | 2023/24 Forecast | 2024/25 Forecast |
|-------------------------|----------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| Potters Bar | 554 | 539 | 561 | 554 | 580 | 574 | 582 | 600 | 586 | 586 |
| + 5% margin | | 566 | 589 | 582 | 609 | 603 | 611 | 630 | 615 | 615 |

Primary School Capacity August 2015

| School Planning Area | School | Current Capacity | Expansion Capacity | Additional Comments |
|----------------------|-------------------------------------|------------------|--------------------|--|
| Borehamwood | Cowley Hill Primary | 2FE | None | Recent 1FE permanent expansion no further expansion potential |
| | Kenilworth Primary School | 1FE | 1FE | Possible 1FE expansion potential with relocation of parking and 2 storey block on existing car park |
| | Meryfield Community Primary | 2FE | 1FE | Possible 1FE expansion potential subject to further highway feasibility |
| | Monksmead | 1FE | Unknown | Possible 1FE expansion potential subject to further feasibility assessments to consider the impact of the proposed 2FE primary school at Yavneh College and recent permission for a permanent modular building |
| | Parkside Community Primary | 2FE | None | Recent 1FE permanent expansion no further expansion potential |
| | Saffron Green Primary | 1FE | None | No expansion potential |
| | St. Theresa's RC Primary | 1FE | Unknown | No feasibility undertaken |
| | Summerswood Primary | 2FE | None | Recent 1FE permanent expansion no further expansion potential |
| | Woodlands | 1FE | None | No expansion potential |
| | St. Nicholas Elstree C of E Primary | 1FE | None | No expansion potential |
| Radlett | Fair Field Junior | 2FE | Unknown | No feasibility undertaken |
| | Hertsmere Jewish Primary (VA) | 2FE | Unknown | No feasibility undertaken |
| | Newberries Primary | 1FE | Unknown | No feasibility undertaken |
| | St. John's C of E Junior | 2FE | Unknown | No feasibility undertaken |
| | St. John's C of E Infant & Nursery | 2FE | Unknown | No feasibility undertaken |
| Shenley | Clore Shalom | 1FE | Unknown | No feasibility undertaken |
| | Shenley Primary | 1.5FE | None | No expansion potential |

| | | | | |
|--------------------|-----------------------------|-------|---------|---|
| Potters Bar | Cranbourne Primary | 2FE | Unknown | No feasibility undertaken |
| | Ladbroke JMI | 1FE | Unknown | No feasibility undertaken |
| | Oakmere Primary | 2FE | Unknown | No feasibility undertaken |
| | Pope Paul RC Primary | 1FE | Unknown | No feasibility undertaken |
| | The Wroxham | 1FE | Unknown | No feasibility undertaken |
| | St. Giles C of E Primary | 0.5FE | Unknown | No feasibility undertaken |
| Bushey | Ashfield Junior | 2FE | None | Recent permission for a temporary modular classroom. No expansion potential, Green Belt |
| | Bournehall JMI | 1FE | None | No expansion potential |
| | Bushey Heath Primary | 1FE | None | No expansion potential |
| | Hartsbourne Primary | 1FE | None | No expansion potential, Green Belt and includes a wildlife site |
| | Highwood Primary | 2FE | None | No expansion potential |
| | Little Reddings Primary | 2FE | None | No expansion potential, expansion would require a MUGA and DPF |
| | Merry Hill Infant & Nursery | 2FE | None | Confined site, further feasibility required to determine expansion potential |
| | Sacred Heart RC Primary | 1.3FE | None | Large site with potential for expansion. However, site is in the Green Belt |

Secondary School Capacity August 2015

Borehamwood

| School | Type | Current Capacity | Expansion Capacity | Additional Comments |
|----------------|-------------|-------------------------|---------------------------|--|
| Hertswood | Academy | 8FE | Unknown | <ul style="list-style-type: none"> • Proposal for consolidation on one site • Expansion potential of new school on former Lower (northern) site unknown • Green Belt designation a constraint to further development on the site. |
| Yavneh College | Academy | 5FE | Unknown | <ul style="list-style-type: none"> • Extant permission for a 2FE primary school on the site, implications on expansion potential of secondary school unknown • Highway concerns |

Bushey

| School | Type | Current Capacity | Expansion Capacity | Additional Comments |
|---------------|-------------|-------------------------|---------------------------|--|
| Queens | Academy | 9FE | Possibly +1FE | <ul style="list-style-type: none"> • Growth to require additional buildings. • Situated on two campuses separated by Aldenham Road. • Green Belt designation a constraint to further development on the site. • Already a large school at 9FE. |

| | | | | |
|----------------|---------|---|---------------|--|
| Bushey Meads | Academy | 5.7FE* *6.7FE following proposed enlargement). | Possibly +1FE | <ul style="list-style-type: none"> Green Belt designation a constraint to further development on the site. Recent 1FE permanent expansion proposal, subject to town planning permission, to 6.7FE Expansion beyond 6.7FE likely to require additional land with non-identified. |
| Bushey Academy | Academy | 7FE | None | <ul style="list-style-type: none"> Recently redeveloped Green Belt and conservation designation a constraint to further development on the site. |

Potters Bar

| School | Type | Current Capacity | Expansion Capacity | Additional Comments |
|---------------------|---------|------------------|--------------------|---|
| Dame Alice Owen's | Academy | 6.7FE | Unknown | <ul style="list-style-type: none"> Green Belt designation a constraint to further development on the site. Further feasibility work required to inform expansion potential. |
| Mount Grace | Academy | 5.8FE | Unknown | <ul style="list-style-type: none"> Major Green Space designation covering the site A number of mature trees, some of which are subject to TPOs. Water course and Flood Zone 3 designation crossing the site |
| Chancellor's School | Academy | 6FE | Possibly +1 | <ul style="list-style-type: none"> The school does not currently have sufficient accommodation to facilitate an increase in pupil numbers and therefore additional buildings would be required. Possible to expand school by 1FE on existing site with sensitive positioning of new buildings and possible highway mitigation. Green Belt designation a constraint to further development on the site. |