

## **WD3 School Action Group (30027) Issue 4 Statement – Education Provision**

The WD3 School Action Group (WD3SAG) believes Section 6 of Three Rivers District Council's (TRDC) SALDD is unsound for the following reasons:

### **1) TRDC's land allocation for educational use is outdated in its inflexibility, and is therefore both unviable and undeliverable.**

The TRDC Plan is based on a very simplistic, outdated planning model. It assumes future school infrastructure will always be built on green-field sites for 8 form-of-entry maintained schools and does not heed the Education Act 2011 whereby a Local Authority must seek to establish an academy/free school to meet an identified need.

Current central government policy for school provision results in the provision of funding for schools to open with less than 8 forms of entry, and not always on (Hertfordshire County Council-suggested) 12-15 hectare green field sites. They can use existing infrastructure (e.g. business premises) and "constrained sites" (DfE Building Bulletin 98 – Briefing Framework for Secondary School Projects).

Prevailing central government policy may change (e.g. it may result in these freedoms being withdrawn should a Labour government be elected and implement a different approach, or these freedoms may be expanded under a future Conservative government). However, the Plan has not been positively prepared because it does not allow for current policy or alternative future options where it is reasonable to do so in a sustainable approach.

Section 38 of the National Planning Policy Framework states that "For larger scale residential developments in particular, planning policies should promote **a mix of uses** in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties." This stresses the need for land to, in future, have a mix of uses. TRDC's plans do not explore how land that has been allocated for other purposes (e.g. employment) could be used for educational purposes.

The identified need for significant additional educational infrastructure has been met by the allocation of two large secondary schools being built on green belt land. The Plan has not utilized current policy to justify this decision. As stated in the National Planning Policy Framework, this single option should be supplemented with other land-use options to ensure a sound, flexible plan that is sustainable alongside ANY future central government education policy.

The WD3SAG therefore recommends that TRDC's SALDD is changed to AT LEAST include all of the following options in each part of the TRDC district (e.g. Rickmansworth, South Oxhey, etc.):

- A green-field development; and

- A brown-field development; and
- Several options for changing prevailing use of existing infrastructure (e.g. office blocks that can be converted to accommodate schools).

**2) TRDC land allocation for educational purposes is the absolute minimum and will not widen choice.**

TRDC's SALDD is based on the presumption that the prevailing predicted demand for secondary school places will be the maximum forecasted demand over the Plan period. However, this is the best-case scenario and has not taken into account additional recent increased forecasts. There is no consideration of any of the worse possible outcomes, and significantly, no consideration of the need for additional primary school provision.

Hertfordshire County Council (HCC), as the Local Authority, have based their forecasts on current school rolls and birth rate figures from local GPs. It does not consider the migrant growth arising from the increased housing in the district or the educational needs of our adjoining local authorities of Buckinghamshire and London Borough of Hillingdon.

TRDC does not allow for the possibility that the prevailing prediction is wrong. It does not consider that an even worse-case scenario is possible whereby population growth outstrips predictions and further chokes local school infrastructure.

In the recent past, TRDC has been highly critical of the HCC's forecasts and plans for secondary school place provision, but seems to have accepted the single best-case forecast scenario presented by that Education Authority. Section 4.5 of TRDC's SALDD states a determination to provide an extra 4556 new dwellings. There is no evidence how, if at all, HCC's prediction of demand matches a TRDC prediction regarding the consequential increased populace in and adjacent to the district.

Section 72 of the National Planning Policy Framework states "The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should give great weight to the need to create, expand or alter schools; and work with schools promoters to identify and resolve key planning issues before applications are submitted."

TRDC's approach to development will not widen choice. It is limited, minimalist, deaf to the views of schools promoters, and totally out of step with contemporary planning thinking.

Forecasting the future is difficult, and contingency is required for if that future does not materialise. It is a well-researched phenomenon that human beings are susceptible to forecasting optimistically. Best planning practice guidance (e.g. from,

amongst others, the Cabinet Office, the Said Business School at Oxford University) is that an adjustment (e.g. a contingency) should be made to all forecasts to eliminate this optimism bias. There is no evidence of such optimism bias adjustment in TRDC's plans.

TRDC's SALDD is therefore neither justified (it is not the appropriate planning strategy) nor effective (there is no guarantee it will deliver what is required to sustain the education of future TRDC communities over the 15-year duration of the SALDD plan).

The WD3SAG therefore recommends that TRDC's SALDD is changed to consider an increased level of population demand and associated levels of school infrastructure. The SALDD should be built such that several levels of primary AND secondary school infrastructure could be allocated land use depending upon different volumes of demand (rather than the single, best-case secondary school-only scenario upon which the SALDD is built at present).

### **3) TRDC's preferred Rickmansworth land allocation is not deliverable in a timescale to meet identified need.**

The Education Authority experts (HCC) have stated repeatedly that the Froghall Farm site is not a 'fit for purpose' site for the secondary school infrastructure required in the district.

HCC will make these arguments to these Hearings itself.

If, despite current educational policy, funding will only be made available for an 8-form-of-entry secondary school at the Rickmansworth end of the south-west Hertfordshire district, of the two sites allocated in TRDC's plans, the Long Lane site is a more suitable site.

Including a so-called alternative site in this part of the district means that any efforts to procure the more educationally-appropriate Long Lane site by Compulsory Purchase Order (CPO) will be rendered complicated, if not impossible. As long as an alternative site exists, the argument for a CPO is weakened, undermining the significant work carried out by HCC to identify the most appropriate educational site.

The local Rickmansworth and Maple Cross community has made it very clear via two TRDC consultations that it desires new local secondary school provision and at the earliest possible date. However, by sustaining two alternative Rickmansworth sites, TRDC is making it impossible to deliver this goal.

The Long Lane site has been the subject of past controversy (when identified for use by M25 construction) and the construction site plans were challenged by TRDC. There appears to be a strong TRDC emotional and political attachment to the preservation of the Long Lane site. However, with a new recognition of the need for extra school provision, there is a need for a fresh independent view upon the best

use of this land, alongside the results of the public consultations which have demonstrated considerable support for a school on this site.

The WD3SAG therefore recommends TRDC's SALDD is changed to remove the Froghall Farm site. The Long Lane site should be the only green-field site allocated in this part of the TRDC district. However, as suggested in 1) above, TRDC should also include in its SALDD other options for this part of the TRDC district to meet the demands of current and future educational policy.