

## Appendix 1

### Mike Parsons : Director

Mr R Messere  
Development Plans  
Three Rivers District Council  
Northway House  
Riversmeet  
Rickmansworth  
Herts WD3 1RL

### Hertfordshire County Council

County Hall  
Hertford SG13 8DE  
Telephone 01992 588118  
Fax 01992 556206  
Minicom 01992 556611  
E.Mail sue.swain@hertsc.gov.uk  
Contact  
My ref  
Your ref

Date 11 March 2010

Dear Mr Messere

### **LOCAL DEVELOPMENT FRAMEWORK – CORE STRATEGY PREFERRED OPTIONS NOVEMBER 2009**

#### **1.0 Introduction**

- 1.1 Thank you for consulting us in connection with the above document. This response is made by Hertfordshire Property on behalf of the following services: Children Schools and Families, Libraries, Adult Care, Waste Management and Fire and Rescue.
- 1.2 We continue to positively welcome the ongoing opportunity being provided to engage in discussions with the Local Planning Authority (LPA) to identify the implications, where possible, for the services and service delivery. In this response we have sought to identify how the implications of a rising birth rate and the proposed manner of forecast housing growth within Three Rivers could impact upon service requirements from a spatial planning perspective.

1.3 Separate representations have been made by Vincent and Gorbing, on behalf of the County Council as a landowner. These deal with those sites where there is considered to be potential for alternative use, including residential development. Those representations were submitted in March 2009.

## **2.0 Implications for Delivery of Education**

- 2.1 In previous representations (dated 7<sup>th</sup> April 2009), we identified the rising birth rates throughout the County and that primary schools were likely to be under pressure to expand over the plan period. We have also explained the background context provided by Building Schools for the Future (BSF) and the Primary Capital Programme (PCP). That situation remains unchanged.
- 2.2 In those same representations we commented upon Open Land/Green Belt designations which could hinder new or expanded schools or the re-provision of replacement schools on the playing fields whilst schools remain open and that it would be preferable if such designations could be removed from school sites. The removal of open land/green belt designations from school sites would be helpful in delivery of both BSF and the PCP. At the least, we suggest that it would be helpful if criteria could be introduced into any such designation, insofar as it relates to school sites, to acknowledge the potential requirement for further development supporting delivery of additional education capacity upon them. A flexible approach to enable, rather than hinder, the expansion of operational schools is a fundamental thread underpinning the whole of these representations insofar as they relate to schools.
- 2.3 Officers in CSF and Hertfordshire Property have considered the implications of the changing needs of the existing community arising from the increase in birth rates and the proposed housing growth on a settlement by settlement basis.

## **3.0 Methodology Applied to Identification of CSF Needs**

- 3.1 The methodology which has been applied to identifying the primary needs for CSF is as follows;
  - The balance between existing capacity in the schools and the current needs of the community has been assessed to establish the ability of schools to accommodate extra pupils
  - Using the latest CSF forecasts to 2015/16, as well as details of births in the academic year 2007/08, the need over this period has been established. Taking into account

surplus places in schools, any additional school capacity needed to meet that need has been identified.

- Where it has been eroded, a small surplus to cater for parental choice and short term variations in pupil numbers needs to be added to the school capacity. This is calculated across the whole community and is up to 10% as recommended by the Audit Commission.
- The above three bullets deal with the situation to 2015/16. It is very difficult to forecast from 2015/16 to 2031 at a time when the national trend in pupil numbers has reversed and is now producing growing numbers of pupils. In order to be prudent, where possible, a 10% allowance has been made to allow for the current rising trend to continue beyond 2016. Capacity allowances under this category should be considered as reserve sites, and it would be helpful if they could be reviewed on a 5 yearly basis. If a site is identified to meet a combination of need the entire site should be considered as a firm need within the plan period and thus not requiring review.
- From that baseline, additional need resulting from development in the manner being consulted on in the Preferred Options paper can be assessed and in doing this we have used pupil yield data for typical new developments across Hertfordshire. A margin of 7.5% is allowed for in the calculations of need arising from the additional development proposed in the ECS. This covers parental choice and year on year volatility. It will be possible to refine yield calculations in the future depending on the specifics of new development including aspects such as the amount of affordable housing.

#### **4.0 Growth in Three Rivers at primary level**

Dealing with each of the CSF Primary Planning Areas in Three Rivers in turn;

##### **4.1 Sarratt**

- 4.1.1 Within the immediate Sarratt area the pupil forecast remains fairly stable and reserve capacity is not considered necessary. The proposed additional 10 dwellings would have little or no impact on places in the village

##### **4.2 Chorleywood**

- 4.2.1 The pupil forecast is relatively stable for the Chorleywood area and as for Sarratt, reserve capacity is not considered necessary. No development is proposed in the document for Chorleywood therefore no additional school places are expected to be required.

##### **4.3 Croxley Green**

4.3.1 A small margin of capacity exists in the short term in the Croxley Green area. However beyond 2015/16 there is the need to establish a reserve capacity of 0.5fe. The document suggests that 57 units will be built between 2011 and 2021 with a further 205 between 2021 and 2026. This equates to the addition of approximately 0.4fe of yield within the area. Capacity exists within existing assets to raise provision by 1fe which would be sufficient to meet the anticipated need.

4.3.2 There is however an outstanding issue of a high number of temporary buildings at most of the existing schools which could be replaced in time. As stated previously where open land or green belt designations cover the sites it would be helpful if these designations could be removed or the policies made more flexible to allow for greater change and/or potential expansion.

#### **4.4 Rickmansworth, Loudwater, Mill End and Maple Cross**

4.4.1 The document suggests 10 units will be built in the period 2009-2015, 234 units between 2026 and 2021 and a further 23 units in the period 2012-2026.

4.4.2 This scale of development would produce the need for an additional 0.5fe which, including the need for some reserve capacity, would lead to the requirement for an additional 1fe capacity overall.

4.4.3 Whether this is achievable by expansion of an existing school requires further feasibility work. It would be prudent to allocate a reserve site for a 1fe school capable of expansion to 2fe in the future if required.

#### **4.5 Abbots Langley, Leavesden and Bedmond**

4.5.1 There is current demand for school places in this area which amounts to 1 fe, some of which is attributable to a wider area including parts of North Watford. It is forecast that the level of demand will continue for the foreseeable future.

4.5.2 There is a need to establish a reserve capacity of 0.7 FE over and above the existing requirement.

4.5.3 The proposed development allocation comprises 60 units over the period 2009-2015, 490 over the period 2016-2021 and 10 over the period 2021-2026. The additional capacity needed in respect of this is likely to be an extra 0.7 FE.

4.5.4 Thus the total requirement is 2.4 FE for this area. This could be partially met by expansion of an existing school by 0.5fe (subject to feasibility). The remaining need must be met by the provision of a new school. At this stage HCC anticipates that this will be best met via a reserve 2 FE site at the northern part of the Leavesden Aerodrome site.

## **4.6 Kings Langley**

4.6.1 Forecast development for this area is 30 units to 2015 and 190 units in the period 2016 to 2021. Together with expected growth just over the district boundary in Dacorum but still within the settlement of Kings Langley, this total indicates the requirement of an additional 1fe.

4.6.2 It would be prudent for HCC to seek a site for a 1fe school with the capability of being expanded to 2fe in the future should it be required. It is anticipated that the most likely location of a new school would be in the Dacorum area

## **4.7 Oxhey Hall, North Oxhey and Moor Park**

4.7.1 Proposed development in this area is approximately 25 dwellings with limited implications for extra pupil places need.

4.7.2 It is not considered necessary for the provision of reserve capacity in this area and it is anticipated that future needs can be met by minor expansion of an existing school.

## **4.8 South Oxhey**

4.8.1 The existing school capacity is forecast to be adequate to 2014. There is however, need to provide reserve capacity of to 0.7fe.

4.8.2 Development in this area is projected at 115 units up to 2015, 10 in the period 2016-2021 and 310 units between 2021 and 2026. The proposed housing would lead to the requirement for approx 0.6 additional FE.

4.8.3 HCC considers that the allocation of land adjacent to St Josephs School is made for reserve school land in the event that 1fe of additional capacity is required. It would however be prudent to retain capacity for a further 1fe should it be required for the future.

### **Carpenders Park**

4.8.3 Notwithstanding the fact that this settlement falls within the education planning area of South Oxhey, Carpenders Park can be considered as a separate community by virtue of spatial separation due to the railway line. The school here is over-subscribed.

4.8.4 Any additional demand will require expansion of the school by 0.5fe, if this proves feasible. The additional housing development proposed in this area is low at 35 units in the first part of the plan period. This is expected to have a limited effect on pupil numbers.

## **4.10 Bricket Wood/Garston**

4.10.1 Since four district boundaries meet near here, this needs to be carefully considered as part of a wider area. Local schools (which include Mount Pleasant Lane in St Albans City and District Council (SADC) and Coates Way in Watford Borough) as well as Catherine of Siena in TRDC are all full.

4.10.2 50 dwellings are proposed within TRDC and others are likely in adjoining districts. HCC may therefore need to consider the expansion of the local school

4.10.3 HCC has made representations to SADC on the proposals for 150 units on the BRE site, regarding the consideration of a flexible green belt policy, to assist in school place provision.

4.10.4 The late inclusion of a further 300 units on the golf course site will require further Consideration. HCC would welcome further discussions with TRDC officers on this matter.

## **5.0 Size of Sites Required**

5.1 As a starting point, where the representations above refer to the provision of new 2fe schools, the minimum site area which should be considered is 2.5 hectares. This is to take account experience of developing school sites and the likely presence of variables including topography, presence of trees, provision of accesses, parking requirements etc. This figure also makes allowance for the additional statutory responsibilities of the County Council with regard to children's centres, extended schools activities, childcare facilities and early year's places for 3 and 4 year olds.

## **6.0 Growth in Three Rivers at secondary level**

6.1 The following section sets out the views of the Children Schools and Families Directorate as also explained in the letter from John Harris of 11.3.10.

6.2 As a natural progression from rising birth rates affecting primary school place demand, and other factors, the above work shows there is forecast a clear and pressing need for additional secondary school places in maintained schools in your Council's area.

6.3 At secondary level there are inter-relationships between the communities in South-West Herts, in particular between Watford and Croxley Green, as parts of those two areas are virtually contiguous. There is a similar relationship between Croxley Green and Rickmansworth and between Watford and Bushey (which also serves Watford Rural Parish). The planning of school places is, therefore, a complex issue which has to take all these areas in South-West Hertfordshire into account. While there are currently surplus places in Bushey, they are forecast to reduce and, by 2015/16, there will be a shortage of places across this whole area of South-West Hertfordshire.

6.4 Rickmansworth/Croxley Green is forecast to have a deficit of 4fe and Watford a deficit of 8fe, including a 5% margin to allow for some level of parental preference and

fluctuation in pupil numbers. As mentioned, there is no potential for a suitable size secondary school site in Watford because of the urban nature of the area. Therefore, HCC is requesting that TRDC identify one and potentially two secondary school sites.

- 6.5 Planning consultants have been commissioned to look at the capacity of the existing maintained secondary schools in the area to see if they are capable of expansion. In addition they have been asked to identify and make a preliminary assessment of a number of sites in the search area of east of Watford, Croxley Green, Rickmansworth and Mill End to see if they have the potential for new secondary school site identification.
- 6.6 A report will be produced with a short list of potential sites which we would wish to have considered in the Core Strategy and Site Allocations DPD processes. Given tightly drawn Green Belt boundaries it may be necessary for Three Rivers to consider the possibility of Green Belt boundary adjustment and Strategic Site allocation of one or possibility two new reserve secondary school sites for development in the period to 2026, depending on the outcome of the study in the 'expandability' of existing secondary schools. It is acknowledged that there will be a need to provide evidence of deliverability of sites and to that end in addition to planning justification for site allocations we will be investigating the justification, if necessary, of the use of compulsory purchase powers for site acquisition. Allocations in the planning system are an essential pre-requisite to the use of such powers.
- 6.7 It has been clear for some time that the absence of a non-faith secondary school in Rickmansworth has caused real difficulties for families in that town, Mill End and Maple Cross. The pattern of schools has meant that many children have been placed in Watford and Bushey. It would best respond to this problem if one of the sites to be considered could be identified within statutory walking distance from those communities in the southern part of the District. A school in this location could provide children in Croxley Green with an additional alternative to Watford schools, thereby taking some of the pressure off the Watford schools. Officers will then be in a position to consider all the available options to deliver the most appropriate long term solution for the area as a whole.

## **7.0 Size of sites required**

- 7.1 In relation to secondary schools an 8fe school would require a site area of 13 hectares, but up to 15 hectares would be required if there are to be ancillary activities on the site.

## **8.0 Library service**

- 8.1 South Oxhey library has recently been extended and refurbished. The service does not anticipate the need for any new libraries as a result of proposed housing numbers in the LDF.

## 9.0 Adult Care Services

- 9.1 The Adult Care Services directorate is responsible for providing care and support to vulnerable adults in a range of accommodation settings. The care groups include older people and persons with physical, learning disabilities and mental health issues.
- 9.2 The amount and type of provision depends on the number of clients needing the service and the type of support they need rather than a direct relationship with the number of new homes being provided. In this respect it is more difficult to assess need on new developments until the residents have moved in.
- 9.3 HCC would therefore like to see sufficiently flexible community policies and consideration of this need when planning for community centres/facilities for new developments.

### **Lifetime Homes**

- 9.4 HCC considers that all new homes should be designed to Lifetime Homes standards as this saves the cost and disruption of later adaptations. However it is recognised that there may be sites that due to their location may not suit residents with mobility problems and there may need to be a degree of flexibility in the application of such a policy. Lifetime Homes should not be substantially more expensive to build, neither should they necessarily affect local character where this is an issue.

### **Extra Care and Supported Housing**

- 9.5 HCC has identified the need for access to additional units of specialist/supported accommodation across Three Rivers district by 2026 as follows;
- 180 units for flexicare (extra care housing) ;
  - 138 units for people with a learning disability;;
  - 39 for mental health and ;
  - 30 for physical disability.
- 9.6 These figures relate to socially funded provision. They are aspirational figures and do not necessarily need to be met by new build development in all cases, but adaptation or re-designation of existing stock. Dwellings should ideally be 1 or 2 bedroom apartments with accessible locations in respect of local facilities (shops, transport routes, health facilities).
- 9.7 There are existing proposals to develop a 'flexicare' scheme in Three Rivers (former Little Furze school) which will go towards meeting need for older people .
- 9.8 With regards to private sector provision, ACS market research in respect of older people indicates that 488 units of private flexicare housing (extra care) could be justified.

9.9 Additionally 81 private nursing care beds and 103 residential care beds need to be developed by 2021

## **10. Fire and Rescue Service**

10.1 The Fire and Rescue Service has a statutory duty to ensure that all development has adequate water supplies (hydrants) and if necessary, fire cover. Hydrants are a standard requirement within the LPA's 106 documents relating to residential development, but are in fact a requirement for all developments.

10.2 Fire and Rescue's interests and concerns regarding further service provision would be raised if there was a proposal to have a sizeable development more than 10 minutes attendance time from the nearest fire station.

## **11.0 Waste Disposal Authority (WDA) Issues**

11.1 This section identifies the interrelationships between the Core Strategy Preferred Options document and the responsibilities and interests of the Waste Disposal Authority, (WDA). There are potential synergies and overlaps which arise out of Three Rivers District's role as Local Planning Authority and Waste Collection Authority, and HCC's role as the WDA.

11.2 While the County Council retains a planning authority function for waste planning, (it is the Waste Planning Authority, WPA), issues like green belt roll back, and policies in LDFs and Core Strategy or Site allocations documents relating to appropriate uses within Employment Areas/new site allocations, can only be made by the Local Planning Authority.

11.3 The potential for these policies to either help or hinder in delivering on the aspirations and needs of the Waste Disposal Authority is therefore clear.

11.4 In order to assist in engagement with both the Waste Planning Authority and the 10 Local Planning Authorities, the WDA resolved to set out and justify its likely service requirements, insofar as they can be predicted now, until 2031. Those service requirements have implications for land and buildings. A copy of the Municipal Waste Spatial Strategy (MWSS) has previously been forwarded to the LPA, (The document does have the status of being the strategy of the WDA, but a revised text version without the word 'Draft' on the cover and other formatting changes is awaited).

11.5 The MWSS has been submitted to the Waste Planning Authority for them to consider as part of their evidence base in the preparation of the;

- Waste Core Strategy Issues and Preferred Options 2 and
- Waste Site Allocations Preferred Options

## **Spatial requirements of the WDA**

11.6 At the present time, the western part of the county (Dacorum, Watford and Three Rivers districts) does not have its own composting facility within the county and the Waste Disposal Authority considers that a new In Vessel Composting facility with capacity for around 50,000 tonnes in the Hemel Hempstead/Watford corridor would be ideally placed to serve this part of the county.

## **12.0. Children's Centres**

12.1 The County Council has a duty to provide children's centres for every 800 (approx) children aged 0-4 years.

12.2 Sure Start Children's centres are part of the local system of universal children's services and offer joined up services for children aged 0-5 years and their families. Children's centres premises are service hubs where children under five years old and their families can receive seamless integrated services and information. Children's centres bring together service providers – statutory providers like health, social care and early education, as well as voluntary, private and community organisations and parents themselves, to provide integrated services for young children and their families based on what local children need and parents want. Children's Centres are a key mechanism for improving outcomes for young children while reducing inequalities between the poorest children and their peers, as well as helping bring an end to child poverty.

12.3 The 82 centres that will be in Hertfordshire by March 2010 will be sufficient for our existing population of young children. New residential development will add pressure on these centres through increased demand. New development of significant scale will involve construction of new Children's Centres.

12.4 Children's Centres in Hertfordshire are very new with the majority being created between April 2006 and March 2010. The current Apprenticeships Skills, Children and Learning Act 2009 amends the Childcare Act 2006 by defining Sure Start Children's Centres in law statute and placed duties on the Local Authority to establish and maintain sufficient SSCCs in their area to meet need.

12.5 An increase in the 0-4 population as a result of increased housing and increases birth rates in the District would result in the need for additional centres. We would need to seek S106 funding to develop the premises for any new centre. They may be developed with partners such as the health authority or placed on school sites (see 5.1 above).

## **13.0 Developer Contributions (ECS and AAP related)**

13.1 We have previously commented that there is a need for the impact of new development to be mitigated and for adequate infrastructure to be provided to support new development. In this respect attention has previously been drawn to the Planning

Obligations Guidance – Toolkit for Hertfordshire document. Whether the Toolkit, or such other means of additional infrastructure provision, (for example via the proposed Community Infrastructure Levy), the costs of new service provision resulting from development, need to be addressed in order to help provide appropriate services for the local community. HCC recognises that the introduction of CIL will involve considerable joint working to develop an appropriate charge and is willing to assist as necessary.

## **14.0 Conclusion**

14.1 Hertfordshire Property and the service we represent, welcome the consultation and we hope that the above comments and information is helpful in producing a sound document.

Yours sincerely

Sue Swain  
Senior Planning Officer  
Herts Property