

Three Rivers District Council Site Allocations LDD

Statement in Response to Main Issue 4:

1.0 Issue 4: Whether the SALDD provides satisfactorily for the provision of new schools over the plan period.

1.1 QUESTION 4.1

1.2 Whether the sites identified for secondary schools should be reserved exclusively for that purpose, even if they are not, in the event, required during the plan period.

1.3 Yes. Policy SA3: Education Site Allocations states that 'Identified education sites for new secondary schools will be safeguarded for educational use'. The sites are proposed for allocation solely to meet the specific educational needs that have been identified by Hertfordshire County Council as the Education Authority and to accord with the requirements of the Core Strategy.

1.4 It is likely that Site S (d) Land north east of Baldwins Lane, Croxley Green will be developed over the plan period. In the event that the remaining sites are not required during the plan period they can be considered to address any educational need identified in the next plan making period.

1.5 All three of the sites are in the Green Belt and in sensitive locations and are only being allocated to meet the specific education needs. The sites have been identified taking account of the site search, technical reports undertaken by HCC including the need for school places and the results of several consultations [**SA CD7**]. In the absence of alternative suitable sites, we are of the opinion that they should be reserved for this purpose only.

1.6 To allocate these sites for any purpose other than education would affect the land values making it difficult for Hertfordshire County Council and/or other education providers to acquire the land either through negotiation or through compulsory purchase powers, and will impede the delivery of education provision.

2.0 Question 4.2

2.1 Whether, in that context, and in the context of Issue 2 more generally, the site identified at Baldwins Lane should be supplanted by or combined with an allocation for housing, as has been suggested.

2.2 No. As stated in response to Question 4.1 the allocation is to address the specific need for education provision. Allocations for housing have been set out clearly in the SALDD following extensive consultation and evidence base studies.

2.3 The representation from CBRE on behalf of Transport for London (**60182/30048/SA1/1**), proposes that the site should be removed from the Green Belt and allocated or safeguarded for residential development. Our opinion on the need to safeguard land for future housing development is set out in our response to Issue 2.

2.4 In considering the size and topography of the site it would not be able to accommodate both a secondary school and housing. The site size and location has been determined through the work of Hertfordshire County Council.

- 2.4 This is Hertfordshire County Council's preferred site and is likely to be developed earlier in the plan period. The report to Hertfordshire County Council's Cabinet on the 23rd September 2013 confirms this:

'In terms of location to address the predicted increase demand Site D land north east of Baldwins Lane is the best placed in terms of geographical location and proximity to Watford, to be developed first as an additional secondary school in South West Hertfordshire. The case for additional secondary school places in South West Hertfordshire is so strong and Site D is so suitable to meet part of that need that the County Council are now able to show that there is a 'compelling case in the public interest' for its acquisition'.

- 2.4 The Cabinet resolved to fund the purchase of the land (Site S (d)) and acquire it through its Compulsory Purchase powers if necessary.
- 2.5 It is clear from the above that Hertfordshire County Council will progress this site in the first instance.

3.0 Question 4.3

3.1 Whether, as has also been suggested, the need for the school in this area would be better served by an alternative site.

- 3.2 Rousebarn Investments Co Ltd (**60025/30014/Sd/2**) have suggested that their clients' land (north of Little Green Lane) as an alternative site to Site S (d) Land north east of Baldwins Lane to provide a secondary school, playing fields and housing as they are of the opinion that Site S (d) is unsuitable as a school site.
- 3.3 Site S (d) is in fact the preferred site of Hertfordshire County Council, who as the Education Authority is firmly of the opinion that Site S (d) is suitable as a Secondary School Site. Hertfordshire County Council's intentions to acquire the site through negotiations or compulsory purchase powers confirms this.
- 3.4 The land north of Little Green Lane, that Rousebarn Investments Co. Ltd refer to, was considered as a potential secondary school site by Hertfordshire County Council and was later included in the Council's Site Allocations Issues & Options Consultation [**SD43**] in November 2010 as a potential secondary school site.
- 3.5 Following the consultation and further technical work carried out by Hertfordshire County Council the site was not considered appropriate for development of a secondary school by the Council. In particular there was concern about the loss of good quality agricultural land and open countryside as well as concern about the access issues via Links Way and Durrants Drive and the impact that would have on residents.
- 3.6 As stated in the Site Allocations Issues and Options Consultation [**SD43** – page 3] Hertfordshire County Council commissioned a technical report looking into the expansion of existing secondary schools and a total of 30 sites, the results of which led them to propose three sites for further consideration. The Council proposed that two other locations which were both included in the 30 sites that were originally identified, had merit and they were also included in the consultation document. The list of possible sites was then reduced to include Sites S (a) (b) and (d) and was consulted on as part of the Site Allocations Pre-Submission (Preferred Options) Consultation [**SD45**].
- 3.7 In our opinion, there are no other sites in that area that would meet the required site criteria or the identified educational need.

4.0 Question 4.4

4.1 Whether one of the two sites identified in the west of the District has decisive advantages which should lead to a firmer stance on the question of which should be taken forward.

- 4.2 The Council's intention is that three sites are allocated for secondary education to provide flexibility and choice for education providers (including the providers of Free Schools) whilst further investigations and liaison with land owners take place.
- 4.3 Whilst we acknowledge that HCC have undertaken some initial investigations the Council still intends to undertake further investigations including liaison with the landowners and technical studies to inform the production of a planning brief for the area. The planning brief will take account of both Hertfordshire County Council's findings and the Council's further investigations in regards to Site S (b). We are of the opinion that Site S (b) advantages are comparable with Site S (a) and as such should not be ruled out.
- 4.4 We acknowledge that there are additional constraints and considerations for Site S (b) which may result in additional costs compared to Site S (a). However, we are of the opinion that the estimates of abnormal costs by Hertfordshire County Council have been inflated due to assumptions that have had to be made because of not being able to gain access to parts of the site, taking account of land that is to be allocated for employment use and for using the highest cost option for access to the site.
- 4.5 As the timescales for development of a secondary school in this part of the District is likely to be at the end of the plan period (or potentially in the next plan period) there is time to complete further investigations and work to inform a planning brief that will result in more comprehensive view of Site S (b).
- 4.6 Consideration should also be given to the needs of those setting up Free Schools. Hertfordshire County Council as the Education Authority has a duty to plan for and secure sufficient school places but, in terms of delivery this will be done by Free Schools or academies who apply to the Department of Education for funding to set up a school and also for grants to purchase the land or buildings.
- 4.7 Hertfordshire County Council are looking to secure the land in order for Free Schools to be able to purchase/lease from them or in the event that a Free School application doesn't come forward, they will be able to provide school provision through an alternative route. It is correct that the cost of land should be considered in their decision about which site to acquire and therefore determine to be more suitable.
- 4.8 However, it is up to the Free School to determine which site would be suitable for their needs. Free Schools have different build requirements than those of Hertfordshire County Council and it might be that some of the estimated costs and constraints of Site S (b) may not be a consideration.
- 4.9 The allocation of the land for secondary use will ensure that the land value remains low and will assist both Hertfordshire County Council and other education providers to acquire the land.
- 4.8 To ensure the long term and sustainable planning of the area including Site S (b) and the adjacent employment site E (d) we will be preparing a planning brief in consultation with the relevant landowners. We acknowledge that the inclusion of the land proposed for allocation for employment use in the site plan for Site S (b) may cause some confusion. For clarity, we propose the following modification which is included in the Schedule of Changes under reference **PC37**:

- to remove the area that is proposed for allocation as employment in Site E (d) from the map detailing Site S (b).

5.0 Question 4.5

5.1 Whether it is necessary to allocate land for primary education in any particular area and, if so, whether this should be part of a larger residential development as has been suggested, for example, at Woodside Road, Abbots Langley.

- 5.2 The Statement of Common Ground [**SoCG1**] sets out the Council's position on the allocation of land for primary education use in both the Rickmansworth and Abbots Langley Areas and we agree that there is a forecast shortage of primary school places in these areas.
- 5.3 With regards to the Rickmansworth area, as stated in **SoCG1**, we advised Hertfordshire County Council on the 11 February 2013 that we were unable to allocate a site in the Site Allocations LDD as none had been identified. It was in the preparation of **SoCG1** that Hertfordshire County Council submitted a document 'Primary School Site Search Rickmansworth Area' which identifies several sites that could be considered for a Primary School.
- 5.4 It is our opinion that further work will be required by HCC, in consultation with TRDC, to determine whether any of these sites will be deliverable which will include further technical studies, consultation with the relevant landowners and the identification of sites for replacement open space and/or recreation facilities where required.
- 5.5 We are, therefore, of the opinion that it is premature to allocate a site for primary school provision in the Rickmansworth area and that delivery can be obtained through the planning application process.
- 5.5 However, following discussions with Hertfordshire County Council in the completion of the Statement of Common Ground in relation to Primary School Provision in the Rickmansworth area [**SoCG1**] we propose that Sites S (a) and S (b) are allocated for Education use in order to accommodate both secondary and/or primary school. This will provide both Hertfordshire County Council and other education providers with more flexibility. We therefore propose the following modifications which are detailed in the Schedule of Changes under reference **PC36**:

Policy SA3: Education Site Allocations

Identified education sites ~~for secondary schools~~ will be safeguarded for educational use.

Paragraph 6.14

Although two sites have been allocated in the south west of the District, only one of these sites may be developed for educational use ~~as a secondary school~~.

- 5.6 In regards to the Abbots Langley area, TRDC have worked with Hertfordshire County Council to identify a suitable site over the last few years but have been unable to agree on a suitable site. The SoCG1 details how TRDC have tried to address this issue including a consultation on a possible site as part of the Site Allocations Preferred Options [**SD45**] consultation.

- 5.7 Hertfordshire County Council have been in talks with the landowners of Woodside Road, a housing site that was considered and subsequently rejected by the Council, and confirmed that they would prefer to take the site forward as part of a residential scheme as it would be easier for them to do so but they would acquire the site through Compulsory Purchase if necessary.
- 5.8 At the time Members considered land at Woodside Road for a Primary school, it could only be delivered with the housing. However it is now clear that the situation has now changed. In any event, the District Council's position is that the lack of an allocation of a Primary School site that can be delivered through the Development Management process is not something that renders the Plan unsound, particularly as it has not been identified as a strategic piece of infrastructure.
- 5.9 The Council is of the opinion that the delivery of a Primary school in this area does not need to be tied to a residential development and that it can be delivered through the planning application process.