

**St Albans District Council
Shaping Our Community
The Core Strategy:
Consultation on the
Strategy for Locating Future
Development in the District
December 2010**

**Consultation Response by
Hertfordshire Property on
behalf of HCC Services**

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SHAPING OUR COMMUNITY – THE CORE STRATEGY: CONSULTATION ON THE STRATEGY FOR LOCATING FUTURE DEVELOPMENT IN THE DISTRICT DECEMBER 2010

CONSULTATION RESPONSE ON BEHALF OF HCC SERVICES

1.0 INTRODUCTION

- 1.1 Thank you for consulting us in connection with the above documents. This response is made by Hertfordshire Property on behalf of the Children Schools and Families, Adult Care Services, Youth and Childcare, Fire and Rescue Services, the Gypsy Section and also on behalf of the Waste Disposal Authority.
- 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 HCC services and service delivery to 2028. In this response we have considered the relatively limited information relating to the manner of proposed growth within St Albans City and District and in as much as it is possible, considered its implications for service requirements and the need for additional sites from a spatial planning perspective.
- 1.3 Enclosed with these representations is a separate report relating to the capacity of existing secondary schools to expand, identifying future demand for secondary places, and the potential need for new education allocations which it would be prudent for the Core Strategy to consider. The report was commissioned by Hertfordshire Property (HP)/Children Schools and Families (CSF), and produced by Town Planning Consultants Vincent and Gorbings.. Some of the conclusions of that work are referred to in this document.

2.0 IMPLICATIONS FOR THE DELIVERY OF EDUCATION PREVIOUSLY IDENTIFIED

- 2.1 We made representations previously on the Emerging Core Strategy consultation dated 30 September 2009. Those comments are attached to this document as **Appendix 1**. However, since then Government policy has significantly changed with the revocation of the Regional Spatial Strategy (East of England Plan). The previous housing target of 7,200 homes from 2001 to 2021 (360 homes per year) is no longer a required target for the District of St Albans. Our previous representations were based on this level of growth to 2021.
- 2.2 In summary, we noted that:
 - Green Belt and other urban open land designations are a constraint upon the capacity of existing schools.

- That the removal of green belt designation from school sites on the periphery of settlements would be helpful in easing delivery of additional educational capacity;
- We commented on the implications, as they appeared at that point in time of selection of the different areas of search in the City and District.

2.3 However, the document identified that in relation to primary school place planning:

- An additional 16 forms of entry (FE) by 2026 and 18FE by 2031 (projected housing growth consulted on in 2009 based on RSS) would be generated;
- It would be prudent to plan for a further 8FE of reserve capacity to cater for possible rising birth rates or child yields and housing developments on windfall sites (based on RSS);
- City Centre primaries still the immediate priority;
- Most potential future need is in St Albans, but there is a need for a further 2FE in Harpenden;
- Location of new school provision will also be informed by housing allocations and phasing in the Core Strategy.

2.4 The document also identified that in terms of secondary school place planning:

- There would be a shortage of places forecast from 2014/15;
- The demand from St Albans and Harpenden together with some surplus capacity for parental preference – 12 FE to 2021 and 14 FE to 2026 (based on RSS);
- It would be prudent to plan for a new 6-8FE school site and a contingent reserve site.

3.0 EXISTING CAPACITY WITHIN THE DISTRICT

3.1 The 'Meeting the Rising Demand for School Places: 2010 update' report attached to these representations as **Appendix 2** forecasts a growing shortage of places in the city of St Albans, rising to 4.5FE in 2012/13 with no surplus capacity. The forecast then indicates a decrease to approximately 3FE. St Albans is an area where significant and unpredictable rises in demand have been experienced and which have since been reflected in the forecast. The city is densely populated, and developed, presenting real challenges in finding suitable school sites to expand, or new sites to develop.

3.2 Section 6 of the Core Strategy Consultation identifies that it is likely that, in relation to housing, SADC will pursue a policy of urban concentration. However, in the absence of a housing trajectory, identifying the locations, phasing and yields of housing it is impossible to predict the capacity of existing schools to

provide sufficient school places for the Core Strategy period to 2028 with any certainty.

- 3.3 A shortage of places is also forecast in Harpenden with over 1FE required for 2011/12 and 2012/13. The rest of the district (including out lying areas around St Albans such as Sandridge, Park Street, Wheathampstead etc) are smaller, less densely populated settlements, and have fewer primary schools. However, representations are made in section 6 about prudent planning for each community.

4.0 FUTURE HOUSING

- 4.1 The Core Strategy consultation document sets out that there will be a requirement to build 250 homes per year from 2011 to 2028. As a crude average across Hertfordshire, HP have found that 1 form of entry (FE) of primary need is generated by 850 houses. In St Albans, the total of 4,250 homes to 2028 generates a requirement for 5 forms of entry at primary level to 2028, assuming development takes place in appropriate concentrations to be served by a single primary. Due to the uncertainty of the tenure, phasing and location of much of the proposed housing, a 7.5% margin figure (mid point between 5-10%) seems appropriate in the calculations of need arising from the additional development proposed in the Core Strategy consultation document. This covers parental choice and year on year volatility.
- 4.2 As noted this represents a ratio of provision of 1FE per 850 units for the new growth. However, it must be stressed that it will be necessary to refine calculations of child yield in the future depending on the specifics of new development, including aspects such as the housing type and tenure, the amount of affordable housing and the amount of family housing proposed in a scheme. This is highly relevant since while an average ratio of child yield from development is 1FE per 850 dwellings, child yields closer to 1FE per 450 have arisen from some types of development elsewhere in Hertfordshire. HCC would look to work in constructive partnership with SADC to consider this point further.
- 4.3 Once further housing trajectory information is made available by the LPA, HCC would be happy to further consider the capacity of the areas used by CSF for school organisational purposes, the Primary Planning Areas (PPAs), to accommodate the child yield that could arise from development. This will also help to confirm the extent of additional primary school capacity that it would be prudent to plan for in the plan period to 2028, and depending upon where the housing development is located, will inform the extent to which Green Belt education allocations may be required to ensure there is sufficient capacity within the City and District of St Albans for the full plan period to 2028.
- 4.4. The Core Strategy Consultation Document identifies strategic housing sites for 750 of the planned 4,250 homes, which effectively represents three years of

housing land. Additional Strategic Housing Locations to cover the remaining development plan period to 2028 have not been identified within this document. While the consultation identifies a policy of urban concentration, the consultation is not accompanied by a Housing trajectory or housing land supply paper covering the plan period to 2028. Without this information and information regarding tenure and phasing, planning for future educational provision within the District is very difficult. Further information relating to the housing trajectory is essential evidence in making informed judgments about the level, extent and location of new education allocations that it would be prudent to plan for to 2028.

5.0 IMPLICATIONS FOR PRIMARY EDUCATION BY SETTLEMENT

- 5.1 We have commented above on the broad need for additional school capacity, but there are issues around the delivery of education in each of the settlements, with common themes to many of them, which we feel it would be prudent for the Core Strategy to deal with in order to provide a sound basis upon which to base subsequent Development Plan Documents.
- 5.2 The information contained below relating to the settlements is based upon what is shown in existing CSF forecasts to 2016/17 and takes into account any strategic growth referred to within the Core Strategy consultation document. However, it is very difficult to assess the implications of future housing growth on current school capacity and other HCC services, due to the absence of any information within the Core Strategy Consultation Document regarding phasing, tenure and location.
- 5.3 It is essential that refinement of judgments of child yield (which will follow with finalisation of a housing target number and more importantly identifying a housing trajectory), takes place before production of a pre submission Core Strategy document. However, a body of work has been carried out by officers in CSF, Hertfordshire Property, and their appointed consultants in identifying those school sites that might potentially be capable of expansion. Together with the latest CSF forecasts to 2016/17, an updated judgment of the capacity of the Primary Planning Areas to accommodate development can be made. This section of these representations identifies the current thinking of HCC officers in this regard, refreshed from 2009, on a settlement by settlement basis.
- 5.4 The work appraising the town planning capacity of the primary schools to expand will be forwarded to SADC in the near future. It should be stressed that the background work referred to, identifies the 'town planning' potential of a school to expand, without applying an educational need layer or in some instances a highways layer.
- 5.5 Until such time as there is a housing trajectory available, it is considered that identification of the latent capacity that potentially exists in each PPA from a town planning perspective, will be helpful in then informing judgments about the ability

of that PPA to accommodate housing growth in the urban area that would be revealed by the Housing trajectory in due course. In the event that there is no spare capacity, then the logical consequence would be that it would be prudent to plan for an education allocation in the Green belt to provide that capacity and in order that the Core Strategy provides the flexibility for the plan period that is necessary.

St Albans City

- 5.6 A copy of a plan of the Primary Planning Areas (PPAs) is attached at **Appendix 3**. The PPAs are organisational areas used by CSF for school place planning purposes. For reasons of educational robustness, and viability, the preference of HCC remains that new schools should be 2 forms of entry (FE). 1FE equates to 30 pupils.

St Albans City

School Name	Current Capacity	Expansion Potential
Garden Fields	2FE	+1FE * ₁
Margaret Wix	1FE	+1FE
Bernards Heath Infants & Junior	3FE	0
Skyswood	1FE	+1FE* ₂
Wheatfields Infants & Junior	3FE	0
St John Fisher	1FE	+1FE* ₂
Aboyne Lodge	1FE	0
St Alban and St Stephen Infant and Junior	2FE	0
Fleetville Infant and Junior	3FE	0
Maple	1FE	0
Oakwood	1.5FE	+0.5FE* ₃
Prae Wood	1FE	+1FE* ₄
Killigrew	2FE	+1FE* ₅
St Peter's	1FE	0
Mandeville	2FE	+1FE* ₆
St Adrian's	1FE	0
Camp	1FE	0* ₇
Windermere	1FE	+1FE* ₈
Cunningham Hill Infant & Junior	2FE	+1FE* ₈
Francis Bacon	0FE	+2FE
St Michael's	0.8FE	0

Infant & Junior		
Abbey	1FE	0

- *1 Not currently planned. May require relocation of another service. Highways issues/needs proving by further feasibility.
- *2 Dependent on detached playing field on SADC land. Site not been subject to highways appraisal. Tight site. Expansion of Skyswood and St John Fisher is mutually exclusive, both owing to need for detached playing field.
- *3 Dependent on flexible Green Belt policy/access improvements and additional playing field in third party ownership. Medium to longer term potential depending upon Core Strategy
- *4 Relies on provision of a Multi Use Games Area (MUGA) or detached playing field in SADC ownership.
- *5 Relies on flexible Green Belt policy/resolution of highways issues which may be insurmountable. Land in third party ownership may assist.
- *6 May be problematic, as high level highways advice suggests access/traffic generation may be problematic unless children live very close to area of need.
- *7 While SADC detached playing field available, there are serious highway deficiencies. Not considered to be deliverable from a highways perspective.
- *8 Detached playing field or MUGA required to meet site deficiencies. SADC land in close proximity to both sites. Highways advice confirms expansion of Windermere and Cunningham Hill is mutually exclusive.

5.7 The above figures indicate that, from a theoretical town planning perspective there is 9.5FE spare capacity within St Albans City PPA to accommodate additional growth (taking into account the fact that Skyswood/St John Fisher and Windermere/Cunningham are mutually exclusive). However, 8.5FE of spare capacity is dependent on the provision of either a detached playing field, MUGA, flexible Green Belt policy or the resolution of highway issues and the practicality of delivering of school expansions on these sites is far from certain. This leaves only 3FE of deliverable capacity within this primary planning area (Margaret Wix and Francis Bacon).

5.8 Given that the 'Meeting the Rising Demand for School Places: 2010 Update' report forecasts a growing shortage of places within the city, rising to 4.5FE in 2012/13 with no surplus capacity, the County Council has sought to provide additional capacity in the form of a new 2FE primary school at the former University of Hertfordshire site on Hatfield Road in St Albans city centre. The Local Authority is also considering the increase of the age range at Francis Bacon to create an all through school with a 2FE primary intake. These measures will provide an additional 4FE capacity within St Albans city to address the **existing known** school place deficit.

Harpenden

School Name	Current Capacity	Expansion Potential
The Lea	1FE	0
Manland	1FE	0
St Nicholas	0.8FE	0

High Beeches	1FE	+1FE* ₁
Sauncey Wood	1FE	+1FE* ₂
Roundwood	1.5FE	0
St Dominic's	1FE	1FE
The Grove Infant and Juniors	2.5FE	0.5FE
Wood End	2FE	1FE* ₃
Crabtree Infant and Juniors	2FE	0

*₁ Subject to provision of detached playing field and highways appraisal. Tight site. HP officers believe highly questionable delivery

*₂ Subject to provision of detached playing field and highways difficulties to be resolved, which may impact on affordability and therefore make delivery questionable.

*₃ Subject to provision of detached playing field/MUGA.

5.9 The above figures indicate there is 4.5 FE of spare capacity within the Harpenden Primary Planning Area. However, 3.FE of spare capacity is dependent on the provision of either a detached playing field, MUGA or the resolution of highway issues. This leaves only 1.5FE of deliverable capacity within this primary planning area (St Dominic's and The Grove).

5.10 Given that the 'Meeting the Rising Demand for School Places: 2010 Update' report forecasts a shortage of places from 2010/11, with over 1FE required for 2011/12 and 2012/13, a temporary expansion of either The Grove by 0.5FE or St Dominic's by 1FE is proposed for 2 years. However, any significant residential development within Harpenden would require appropriate education provision in the form of a reserve school site.

5.11 Attention is drawn to section 5.72 of the Delivering Secondary School Expansion Town Planning Appraisal summary document enclosed with these representations. Hertfordshire Property consider that in order to provide flexibility within the plan period, it would be prudent for SADC to make an education allocation on the rural estate land adjacent to Roundwood Park School and running up to Roundwood Lane, which could assist in the provision of additional secondary and primary school places in Harpenden. As well as providing Sir John Lawes School with appropriate detached playing fields, it could offer additional primary capacity and ancillary community benefits.

5.12 In addition to the allocation on HCC land, a reserve education allocation in the Green Belt on the east side of Harpenden is also being sought (see section 5.52 to 5.61 of the Delivering Secondary School Expansions report) to provide further flexibility and certainty in the Plan period and while this is ostensibly to cater for potential secondary need, the site could also provide additional primary capacity.

Bricket Wood

- 5.13 Bricket Wood is currently served by a 1.5FE school, which is located within the Green Belt. The site has capacity to expand by 0.5FE, subject to flexible Green Belt policy and expansion onto the adjoining HCC rural estate land.
- 5.14 In order to allow for any development at Bricket Wood, and in order to plan for any continuation of the current trend in rising rolls, and to enable the provision of some surplus, it would be prudent to either roll back the Green Belt, or to have a policy which caters for the potential expansion of the school onto the adjoining land at Waterdell owned by HCC and currently in the Green Belt.
- 5.15 Such a policy would be prudent to enable provision of additional capacity to cater for potential demand arising out of the new strategic housing allocation in the vicinity of Bricket Wood identified in the consultation document and windfall growth.

Park Street

- 5.16 Both How Wood and Park Street schools are 1FE sites. Park Street Primary is in the Green Belt. In order to plan for additional demand, it would be prudent to either roll back the Green Belt, or to have a policy which caters for the potential expansion of the school within the Green Belt. Park Street could potentially be expanded by 1FE, subject to flexible Green Belt policy and a full highway assessment which may rule out further expansion. How Wood Primary is not considered to have town planning capacity to expand.

Sandridge

- 5.17 Sandridge School is served by a 21 place entry school within the Green Belt. The Green Belt designation washes over the whole of the settlement. In the event that there is any prospect of there being a residential scheme yielding high numbers of children, (for example a rural exceptions affordable housing scheme), then there is plenty of land within the existing site for the school to expand (up to 1.2FE), and it would be prudent for there to be a policy seeking to enable and guide the expansion of the school within the Green Belt. Any expansion would have to be subject to a highway assessment to ensure there is capacity within the local road network.

Wheathampstead

St Helen's	1.3FE	0.7FE* ₁
Beech Hyde	1FE	0

*₁ Relies upon detached playing field (HCC to retain rights for Wheathampstead Secondary playing field).

5.18 St Helens is a 1.3FE primary, Beech Hyde a 1FE primary. Both sites are within the urban area. There is no spare capacity within the schools to allow for any growth arising out of Strategic Housing Allocations, or from windfalls. In order to plan for additional demand from any of these sources, for any continuation of the current national trend in rising rolls and to enable the provision of some surplus capacity it would be necessary to identify a detached playing field to serve the schools. In this respect, providing there is no unduly restrictive urban open land policy washing over the existing urban school sites, additional capacity could be provided through making use of the former Wheathampstead Secondary School playing fields, as detached playing fields.

Redbourn

5.19 Existing places are provided in a well located 2FE school within the urban area (Redbourn Infant and Junior). The forecast for Redbourn indicates that there will be a small deficit of places from 2011 in some years. In order to plan for any strategic growth or any growth arising from windfalls, and for any continuation in the national trend in rising rolls it would be prudent for there to be a policy to guide and permit development on the existing school site. We would anticipate that additional capacity could be created on the existing site by identifying a detached playing field on land nearby owned by Hertfordshire County Council.

London Colney

5.20 There is an existing 4FE of primary capacity in the settlement. The current forecast suggests that there will be a deficit of places by 2016/17. There is little or no potential for the schools within London Colney to be expanded. The Consultation Document identifies a Strategic Housing Allocation of 100 houses at Ridgeview, Barnet Road to the south east of London Colney. The consultation document also identifies a Strategic Housing Allocation of 250 houses at Harperbury Hospital, south west of London Colney. These developments will cumulatively exacerbate the deficit of places forecast in this Primary Planning Area and would lead to the potential requirement for new primary school places, which do not currently exist.

Colney Heath

5.21 Colney Heath Primary is located within the Green Belt and has an existing capacity of 1FE. The Green Belt designation washes over the whole of the settlement. In the event that there is any prospect of there being a residential scheme yielding high numbers of children, (for example a rural exceptions affordable housing scheme), then there is plenty of land within the existing site for the school to expand (up to 1FE), and it would be prudent for there to be a policy seeking to enable and guide the expansion of the school within the Green Belt. Any expansion would have to be subject to a highway assessment to ensure there is capacity within the local road network.

East of Hemel Hempstead

- 5.22 The Consultation Document also identifies a Strategic Housing Allocation at Spencer's Park, West of Cherrytree Lane, to the east of Hemel Hempstead. This housing allocation will exacerbate the deficit of places forecast within the Hemel Hempstead East Primary Planning Area. The draft Dacorum Core Strategy document, on which HP submitted representations on behalf of HCC Services in December 2010, acknowledged the need for a new primary school in this area to address the forecast demand as part of the AAP/joint working with SADC, which is positively welcomed.
- 5.23 HCC would welcome the opportunity of engaging with officers of DBC/SADC as appropriate regarding the identification of land to deliver a new 2FE primary school, and would support this as being prudent for the Plan period to 2028. The work to establish school capacity both for the short term future and in terms of latent capacity has been the subject of parallel activity in Dacorum. It would be sensible to plan for the identification and allocation of a new 2FE primary school reserve site as part of the expansion of East Hemel and the proposed Strategic Housing Allocation at Spencer's Park, whether that is in the DBC or SADC administrative area. Such provision is justified and can only be regarded as being prudent in a spatial plan seeking to cover the period to 2028.

6.0 SECONDARY SCHOOL SPATIAL NEEDS

- 6.1 On behalf of CSF/HP, the work referred to in section 1.3 above has been commissioned to identify the potential to expand existing secondary school capacity. Over and above this potential latent capacity Vincent and Gorbing have also considered the sequential suitability and deliverability of other land to provide additional secondary school capacity. It is considered that it would be prudent for the Core Strategy to make provision for education allocations. This approach will ensure that the Core Strategy is sufficiently flexible, and delivers sufficient secondary school places for the plan period to 2028. It will also ensure that the Plan will be justified and effective, deliverable, flexible and sound.
- 6.2 In summary, (see Section 7 of Vincent and Gorbing Delivering Secondary School Expansion) from a secondary education perspective, it is considered that it would be helpful if the Core Strategy can identify education reserve allocations on land as indicated in the accompanying Vincent and Gorbing report, (2 at Harpenden and 4 at St Albans). The confirmation of which sites should be allocated in any subsequent Site Allocations Document will be dependant upon the views of the Local Planning Authority, and subsequent technical investigations.
- 6.3 In terms of the practicality of delivery, it would be helpful if there can be formal education allocations as part of any subsequent Site Allocations document, with those explicit education allocations or reserves being sewn into the process. If the education allocation is merely being considered as part of a wider housing or other

release from the Green Belt or other allocation site acquisition will be prohibitively expensive¹.

7.0 CSF SCHOOL SPATIAL NEEDS CONCLUSION

- 7.1 The above work has identified that from a theoretical town planning perspective, there is existing primary capacity of 18.4FE across the District ((taking into account the fact that the expansion of Skyswood/St John Fisher and Windermere/Cunningham are mutually exclusive). However, 15.9FE of spare primary capacity is dependent on the provision of either a detached playing field, MUGA, flexible Green Belt policy or the resolution of highway issues and does not take into account the suitability of those locations in terms of educational need.
- 7.2 Any combination of these issues may make expansion impractical. The suitability of that theoretical capacity, (much of which is in the smaller settlements and the villages), to meet the needs arising from a policy of urban concentration is also unknown, until the housing trajectory is available. There is therefore only 4.5FE of existing deliverable primary capacity, which is not dependent on any of these factors across the District. The schools providing this capacity are Margaret Wix and Francis Bacon in the city of St Albans and St Dominic's and The Grove in Harpenden.
- 7.3 From a secondary education perspective, it is considered that it would be helpful if the Core Strategy can identify education reserve allocations on land as indicated in the accompanying Vincent and Gorbing report, (2 at Harpenden and 4 at St Albans). The confirmation of which sites should be allocated in any subsequent Site Allocations Document will be dependant upon the views of the Local Planning Authority, and subsequent technical investigations.
- 7.4 Identification of new Major Developed Site boundaries, or education allocations in the Green Belt, flexible urban open land policy and identification of detached playing fields will also enable the County Council to expand existing school sites in some instances. This is particularly relevant in villages where there is only limited capacity at present.

¹ Part III of the Land Compensation Act 1961 provides a mechanism for indicating the kind of development (if any) for which planning permission can be assumed by means of a 'certificate of appropriate alternative development'. The permissions indicated in a certificate can briefly be described as those with which an owner might reasonably have expected to sell his land in the open market if it had not been publicly acquired. Therefore, if X number sites are identified as being educational sites in the development plan and they are located in the Green Belt, then the alternative use is limited to those uses which are appropriate in the Green Belt. If however, the identification is simply as a school as part of a wider housing release, then one might argue that the alternative development would be residential and the site acquisition will be prohibitively more expensive.

8.0 OTHER COMMENTS ON CORE STRATEGY FROM EDUCATION PERSPECTIVE

8.1 In section 6 the Core Strategy consultation document poses the question;

Where educational establishments in the Green Belt can demonstrate a real need to provide improved facilities and to expand, should future housing growth at these locations be considered, as enabling development to provide the educational improvements?

8.2 The question seems to suggest that only residential development in the Green Belt would contribute towards making appropriate contributions to mitigating the impacts of new development. However, given the fact that the LPA is pursuing a strategy of urban concentration, it would be important to ensure that **all** development makes appropriate provision towards the provision of new infrastructure.

8.3 It is for the Local Planning Authority to identify specific sites and broad locations for development in the Core Strategy. These sites and locations should not be determined by the potential to improve educational facilities. They should be determined through a balanced assessment of the reasonable alternatives (housing growth options and spatial strategy scenarios) taking into account the evidence base of the LDF. It is for the Local Planning Authority at the planning application stage to determine the particular merits of any proposed planning application in accordance with the Development Plan and any other material considerations. At that time, the County Council as service provider will consider the potential benefits accrued through any planning application and will seek the appropriate education planning contributions that are fairly and reasonably related to the development.

8.4 As is evidenced elsewhere in these representations, in the accompanying reports on secondary school capacity and identifying potential secondary education allocations there is considered to be a need to identify new education allocations in the Green Belt during the plan period to 2028 and the expansion of existing schools currently located in the Green Belt. Expansions or improvements to existing secondary schools would be greatly assisted by a review of each site in the Green Belt (where it is likely that expansion will be required and where it is possible that expansion could be achieved in town planning and highway terms); and either the relaxation of the existing Green Belt designation by defining MDS status (with infilling envelopes that allow the potential future expansion) or by removing the area of school buildings from the Green Belt.

8.5 In the case of primary school capacity, the extent of those allocations cannot be determined with any certainty until further information relating to the housing trajectory is available. However, at this stage given the strategic allocations set out in the document we have indicated that it would be prudent to plan for new school places in the Green Belt at;

- Bricket Wood (existing school)

- London Colney (prudent to plan for new capacity)
 - Harpenden (Roundwood primary and potential new school sites)
 - An as yet unknown number of potential primary allocations round St Albans
- 8.6 Representations have been made previously relating to the potential for expansion of Oakwood School, which is located in the Green Belt. Either the building zone could be removed from the Green Belt with a policy that enables development for educational purposes. Alternatively, the site could be identified as a Major Developed Site in the Green Belt and an infilling envelope created to enable development to take place as and when required, for educational purposes in the plan period. The definition of an MDS boundary might include the identification of third party land, in the event that the LPA determines that is an appropriate location for development.
- 8.7 We have stated elsewhere, that HCC officers in CSF and HP would welcome the opportunity of considering the implications of the housing trajectory further before confirming the extent of primary education allocations that would be required.
- 8.8 Nonetheless, our view is that the need for such education allocations should be recognised within the Core Strategy.
- 8.9 On behalf of CSF, it is considered that appropriate education allocations are required in order to deliver a potential supply of school places at both a primary and secondary level for the plan period. This will ensure that the Core Strategy is robust and sound.

9.0 CSF/CHILDREN CENTRES AND SIZE OF SITES REQUIRED

- 9.1 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 years places for 3 and 4 year olds.
- 9.2 The methodology applied to secondary school sites is set out in section 3, page 8 of the accompanying report 'Delivering Secondary Expansion Town Planning Appraisal Summary report.
- 9.3 We would anticipate that CSF needs would ultimately feature in any subsequent Site Allocations Development Plan Document. However, given the imperative need to identify opportunities for sufficient school place capacity during the plan period, and the fact that expansion of existing schools and the provision of new schools will inevitably affect sites washed over by both Green Belt and urban open space designations, we remain concerned that in order to ensure its soundness, the Core Strategy should identify sufficient school sites to enable

HCC to deliver education services. We would continue to welcome further discussions with the LPA regarding CSF needs insofar as they relate to the Core Strategy.

10.0 YOUTH AND CHILDCARE

10.1 In Harpenden, feasibility work is ongoing relating to the potential re-provision of a youth centre at the Library/Former Oaklands college site. As noted in previous representations, in the first instance this feasibility work will confirm the extent of the site for the expansion of the public library is under way, which would then confirm the amount of residual space available to deliver other uses, for example re-provision of the youth centre. The potential availability of the rear part of the site to contribute towards urban housing land supply has been noted in previous representations.

11.0 IMPLICATIONS OF THE CORE STRATEGY FOR LIBRARY SERVICES

11.1 As noted above, feasibility work to consider the expansion potential of Harpenden library is ongoing. The library service has advised that Redbourn library is housed in a wooden framed building of limited life and that in due course the issue of re – provision will need to be considered. Opportunities for relocation which represent an improvement to the service to the population of Redbourn might also be considered depending upon accessibility and viability at the time.

11.2 St Albans City library is the busiest public library in Hertfordshire and from the perspective of the library service; the building is in the correct location to meet their requirements.

12.0 IMPLICATIONS OF THE CORE STRATEGY FOR THE FIRE AND RESCUE SERVICE

12.1 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 to which the County Council is a party, but are a requirement for all developments.

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

13. IMPLICATIONS OF THE CORE STRATEGY FOR THE GYPSY AND TRAVELLER COMMUNITY

13.1 The Core Strategy Consultation Document does not refer to any future pitch provision for the Gypsy and Traveller community.

14. IMPLICATIONS OF THE CORE STRATEGY FOR HEALTH AND COMMUNITY SERVICES

14.1 This section collates and explains the service requirements predicted by Health and Community Services (HCS, formerly Adult Care Services) that may necessitate the development of additional buildings in St Albans. It has been produced as part of the current Core Strategy consultation by St Albans.

14.2 The accommodation based service requirements of HCS have been set out in a number of strategies focused on different groups of vulnerable adults that require social care support. The overarching strategic approach has been set out in the HCS Plan 2009-2012, which states that HCS will provide people with choice and control over the services they need, including the provision of more community based services that will allow more people to achieve their preference of living independently in their own home.

14.3 Accomplishing this requires HCS and partner organisations to concentrate on commissioning suitable housing based services. In particular, HCS has set specific targets for increasing flexicare (Hertfordshire's version of extra care) housing, and supported living services in the 2009-12 Plan. It also means that HCS should become less reliant on commissioning residential-based care across all care groups.

14.4 Table 1 below summarises the accommodation services needed in St Albans as estimated by the following sources:

Older People's Services

Accommodation for Older People Strategy 2008-10 (2007);
Flexicare Housing Strategy 2010-20 (2009)

Learning Disabilities

Joint Strategic Needs Assessment for adults with learning disabilities in Hertfordshire (Russell Associates, 2009)

Mental Health

Adult Mental Health Hertfordshire Accommodation Strategy 2009-13 (Joint Commissioning Team, 2009)

Physical Disability/Sensory Need and Child Care Home Leavers

(Draft) Hertfordshire Housing Needs Strategy 2009-2030 (2009)

- 14.5 All these plans have combined the strategic imperatives outlined above, data on past and current take-up of services, and demographic data such as predicted population changes and the prevalence of ill-health (e.g. data relating to strokes, brain injury, severe disabilities, falls and MS).

Table 1 – HCS Accommodation services requirement for St Albans

Accommodation Type	Units
Social rented/public accommodation	
Older People – Flexicare Housing (2008-2021)	229
Older People – Nursing Care (2010-21)	40
Learning Disability Supported Housing (2010-2025)	69
MH – Low and medium supported accommodation (2009-13)	61
Physical Disabilities housing (2009-30)	40
Total all care groups	448
Privately financed accommodation for Older People	
Older People Flexicare Housing – Private (2010-21)	441
Older People Residential care – Private (2010-21)	88
Older People Nursing care – Private (2010-21)	56
Total	585
Total St Albans	1033

Detailed explanation of figures (including geographical preferences)

Older People’s Services

- 14.6 The fact the Core Strategy consultation document includes health care proposals for the identification of sites for elderly people’s housing and flexi-care facilities is positively welcomed.
- 14.7 HCS predict a need for 441 private extra care units and 229 affordable extra care units by 2021. HCS are working with St Albans District Council to re-provide the sheltered schemes; Caroline Sharpe and Leacroft to provide 60 units of affordable extra care. The Caroline Sharpe and Leacroft developments will rely on Housing Associations willing to develop them as flexicare. If they do not volunteer, the sites would have to be released for retirement housing, which is more attractive to build as it has no communal areas.
- 14.8 The remainder of the need can largely be achieved through the remodelling of existing accommodation, but will also require new builds. Because of the limited availability of

sites of around 2ha where extra care can be cost effectively provided (around 40 units) HCS's response to the question in Section 6 of the Consultation Document as to whether Green Belt land should be considered for older people's accommodation is that it should. The provision of extra care is not an additional housing demand beyond that resulting from demographic changes, because it accommodates people who would otherwise have occupied sheltered schemes or residential care. Larger developments would be particularly beneficial in giving the option of a retirement village where care can be provided flexibly across a range of housing types.

14.9 When evaluating sites or plans for the development of additional flexicare schemes, the following criteria should be considered:

- It must be large enough to be financially viable. New-build schemes that follow the balanced community model are typically at least 60 units, or achieve that scale by extending their service to people living nearby.
- All apartments should be built to a lifetime home standard, and be accessible and appropriate for care to be delivered now or in the future. This includes the provision of walk in showers or wet-bathrooms.
- Plans should incorporate communal areas, an office space for scheme managers and sleeping facilities for on-site care staff.
- The proposed site should be near shops and other local amenities; the surrounding area should be relatively flat and navigable for older people; and good transport links must be available nearby.

Residential and Nursing Homes

14.10 Most of the issues stem from the high value/lack of land in the St Albans area. There is an apparent shortage of nursing and nursing dementia beds in those areas, with families often having to travel out of the District to see their relatives. Recent policies on steering away from residential care seem to have balanced the situation in St Albans. Due to the affluent nature of these districts, homes tend to not have problems attracting self funders.

Mental Health Services

14.11 The Joint Commissioning Team (JCT) has identified a need for additional accommodation in the St Albans area. HCS has identified there is a need for tenancies to move people on from higher support accommodation. The preferred accommodation type is one bedroom flats. There is a need for 61 additional places between 2009 – 2013.

Learning Disability Services

14.12 The larger towns e.g. St. Albans/ Harpenden/ London Colney are preferred locations because of transport links and lower risk of isolation. Needs analysis indicates 69 additional places are required between 2009 – 2025. Standards for supported living housing for people with learning disabilities include:

- Housing should be like other housing in the area and non institutional in appearance.
- Small developments are required (6 – 12 units) so they are part of the community. One bedroom flats are preferred.
- Housing should be located in places with good transport links, local shops and other amenities accessible.
- Prevention of isolation is important and this can be achieved by engagement in local activities and opportunities. Sometimes provision of communal facilities on site will facilitate this.

Physical Disability Services

14.13 HCS have identified two key areas for enhancement in accommodation for those with physical disabilities: firstly better documentation and use of already adapted accommodation, whether purpose built or by use of disabled facilities grant; and secondly development of schemes for younger people to enable them to live independently.

Qualification of figures

14.14 When quoting the above figures, a number of qualifications should be emphasised. These figures represent the maximum possible buildings requirement of adult care for the various service user groups. It is likely that a significant proportion of the new services will be provided using existing buildings that are currently being used for other purposes. For example, it is possible that some sheltered schemes could be 're-categorised' as flexicare without the need for redevelopment.

14.15 It is expected that new services will reduce the need to commission other buildings based services, particularly residential care, across all care groups. Analysis by HCS has suggested that there are people inappropriately placed in care homes who could live independently with the right accommodation and support package.

14.16 Attempts have also been made to estimate the need for privately/self-funded social care services, such as residential, nursing and flexicare. Predicted increases in the need for these services reflect the very large increases expected in the number of older people, and the number of home-owning older people who are unlikely to qualify for financial assistance from HCS.

14.17 It should be noted that not all of the needs analysis exercises that HCS have conducted have estimated service requirements to 2030. HCS are currently working to

refresh and extend their analysis of need for accommodation based services across all service groups.

15. WASTE DISPOSAL AUTHORITY (WDA) ISSUES

- 15.1 This section identifies the interrelationships between the Core Strategy Consultation Document and the responsibilities and interests of the Waste Disposal Authority, (WDA). There are potential synergies and overlaps which arise out of St Albans City and District's role as Local Planning Authority and Waste Collection Authority, and HCC's role as the WDA.
- 15.2 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.
- 15.3 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.
- 15.4 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.

Spatial Requirements of the WDA

- 15.5 The Municipal Waste Spatial Strategy (MWSS) identifies the fact that the St Albans Household Waste and Recycling Centre at Ronsons Way is too small for the demands placed on it. It acknowledges that the pressures on the centre have been to some extent relieved by the development of the Waterdale Household Waste Recycling Centre. However, the MWSS indicates that enlargement or relocation is still desirable.

16.0 OTHER MATTERS IN CORE STRATEGY CONSULTATION

Economic Development/Employment

- 16.1 In previous iterations of the Core Strategy (September 2009), SADC consulted on the potential for land east of London Road, and north of the A414, adjoining Herts County Council Rural Estate land comprising part of Highfield Farm as potential strategic Employment land release. In the event that the LPA identify that it would be helpful for the best planning of their area, HCC would consider making the land available for development.

Retail

- 16.2 In previous iterations of the Core Strategy, (September 2009), SADC consulted on a number of potential locations for additional retail capacity, (FS1, 2, 3). While there is no longer an explicit reference to FS2 within the current Core Strategy consultation, HCC would again consider making the land that was subject to an earlier planning brief and any other related land necessary available in the event that SADC determined that was necessary for the best planning of the City and District.

Green Corridors and Spaces Proposals

- 16.3 HCC note the reference to potential use of the former Radlett Aerodrome as an eco park (with public access, community food production, woodland planting and possible biomass or wind facilities). We are not aware that there have been any discussions relating to these proposals with the HCC Corporate Estate team and would therefore question their deliverability. HCC officers would welcome the opportunity of discussing these matters further.

17. PLANNING OBLIGATIONS/INFRASTRUCTURE NEEDS

- 17.1 We note the reference in the Core Strategy consultation to ‘an infrastructure deficit particularly in school places’ within the District. It should be noted that this relates not just to existing needs, but also to proposed development. In seeking developer contributions, the contributions from new development should be associated solely with the mitigation of the impacts of the new development, not addressing historic shortfalls, to ensure that they are robust, sound and justifiable. The identification of the fact that development needs to be accompanied by the delivery of appropriate infrastructure relates to both existing and new schools.
- 17.2 We have previously commented that there is a need for the impact of all 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 Infrastructure Levy or in the period to 2014, a Planning Obligations Supplementary Planning Document (SPD)), 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 on any relevant documents, i.e. Infrastructure schedule, Infrastructure Delivery Plan, SPD, charging schedule or Local Investment Plan (LIP).

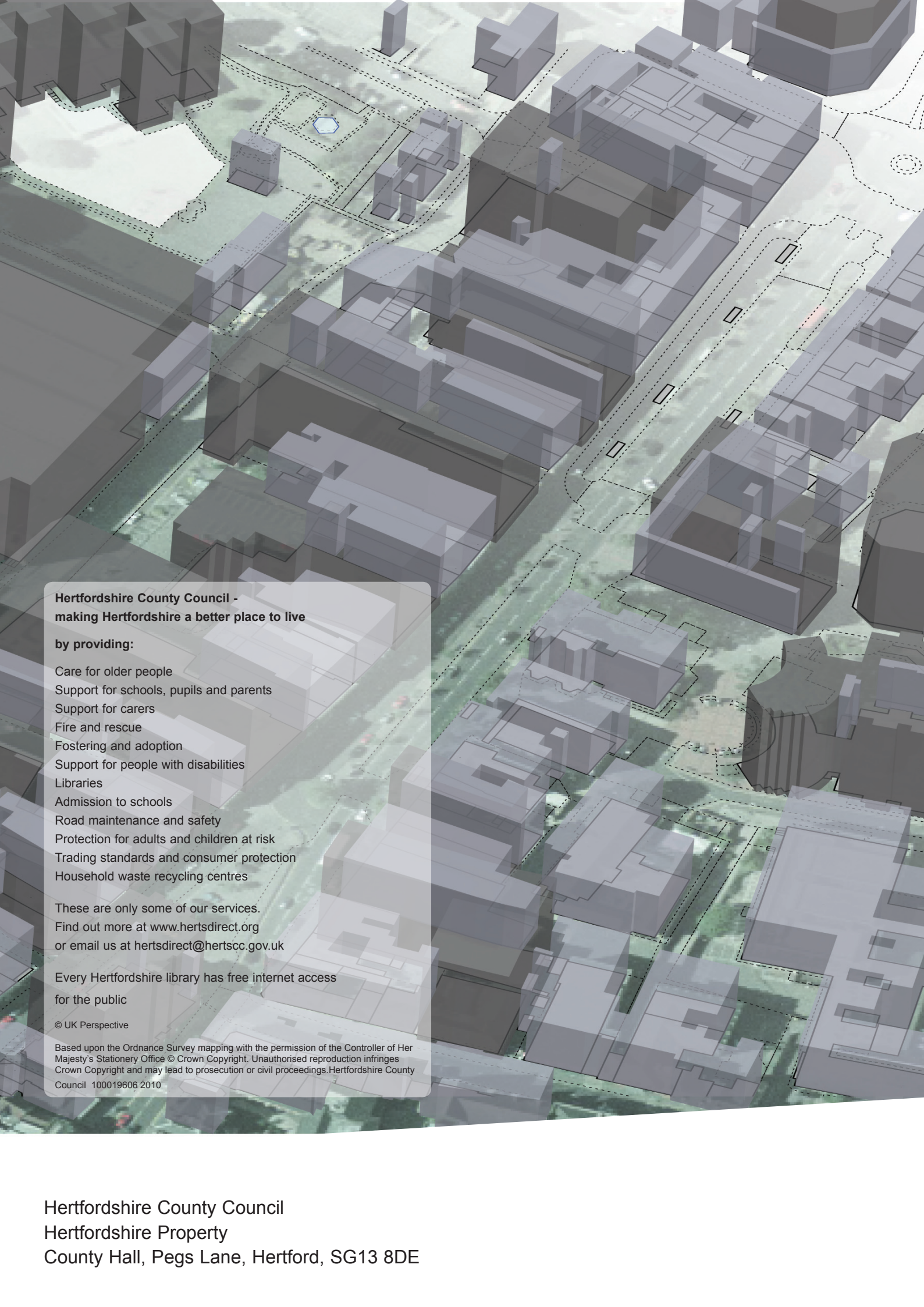
17.3 We would comment that the Core Strategy should identify the broad locations where new housing development and new infrastructure will be located, and identify the mechanisms to secure its delivery. We believe that the Core Strategy would be improved if it provided more certainty and clarity relating to the locations of new housing and supporting infrastructure before the document reaches the pre-submission stage.

17.4 Officers from HCC, (CSF, and Hertfordshire Property – both Development Services and Planning Obligations), would welcome the opportunity of discussing these issues further to ensure that the pre-submission version of the Core Strategy is as robust as it can be.

18. CONCLUSION

18.1 Hertfordshire Property and the services we represent, welcome the consultation and we hope that the above comments and information is helpful in producing a sound Core Strategy for pre submission consultation.

18.2 It is appreciated that the LPA will have questions resulting from the content of these representations and we look forward to meeting with the Forward Planning team in due course and continuing the process of positive engagement between us which has taken place to date.



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