

Examination of the Stevenage Borough Local Plan (2011-2031)

Stage 2 hearing sessions

Statement of North Hertfordshire District Council (representor ref: 405069)

Note: *This statement is written on the presumption that, if this session proceeds, the Inspector is minded to find the plan sound and legally compliant on the matters discussed at Stage 1 of the examination. This includes the objective assessment of housing needs and any associated discussion or evidence relating to future population.*

Matter 11 – Community facilities

Questions 1, 2, 3, 4, 5 and 8.

1. North Hertfordshire District Council (NHDC) has no specific comments to make against these questions.

Question 6. What consideration has been given to the increase in demand for educational provision as a result in the increase in new homes and increased population during the Plan period and what increase in places is planned?

Question 7. Is the proposed provision justified and based on a sound evidence base?

Summary:

- The Memorandum of Understanding between NHDC and Stevenage Borough Council (SBC) agrees that the plan makes sufficient education provision;
- There are however inconsistencies between the plan and the evidence base which need to be addressed to provide clarity;
- There is current capacity within SBC of 1,366 school places at Year 7 with potential capacity to provide 1,591 places;
- Analysis of the 2014-based Subnational Population Projections (SNPPs) shows this is more than sufficient to accommodate projected secondary education requirements arising from within SBC over the plan period;
- Hertfordshire County Council's preferred approach does not relate to the SNPP. This leads to substantially higher requirements for schools places. Adoption of this approach could undermine conclusions reached in relation to the Stage 1 hearings.

2. NHDC and SBC agree in their Memorandum of Understanding that the education strategy for Stevenage, as set out in LP1, makes provision for the educational needs arising in the Borough in the future (ED130, paragraph 10.1).

3. The plan makes no reference to any potential unmet educational needs and at the time of SBC's regulation 19 consultation there was no formal 'ask' of NHDC by SBC in this regard.
4. However, NHDC now consider that further clarity is required within the plan, particularly with regards to secondary education. In turn this will provide greater certainty when it comes to the examination of NHDC's own plan.
5. This position has arisen following the submission of apparently inconsistent evidence to the examination, in particular parts of ED103, T11 and ORD2 when compared to LP1, HP2, ED112, ED114, ED130 and other elements of T11. The former suggest that there may be a shortfall of education provision to meet the Borough's future needs whilst the latter consider (either explicitly or implicitly) that there will not.
6. These matters have arisen since submission of Stevenage's plan for examination in July 2016. They fall outwith any consideration of the Duty to Cooperate as dealt with at Stage 1 (see NHDC Matter 1 Statement, paragraph 3) and can be dealt with purely as a matter of soundness.
7. SBC have reconfirmed their position by email dated 12 January 2017 setting out their view that adequate provision has been made. This corresponds with the position in the plan and the SBC / NHDC Memorandum. This correspondence is attached as Appendix 1.
8. Parts of NHDC surrounding Stevenage, along with parts of East Hertfordshire District Council (EHDC) fall within the Stevenage School Planning Area (SPA). This is an area defined by Hertfordshire County Council (HCC) for the purposes of education planning. A map detailing the Stevenage SPA is included in Appendix 2. The NHDC parishes of Graveley, Great Ashby and Knebworth lie within the Stevenage SPA.
9. NHDC's own emerging plan (ORD1) currently includes contingent requirements for secondary education provision within two proposed housing allocations that lie within or immediately adjoining the Stevenage SPA at Great Ashby and Knebworth. These requirements are subject to up-to-date assessments of need¹. The soundness, or otherwise, of these policy requirements will be explored through any future examination of NHDC's own plan and do not fall to be considered here.
10. However, in order to inform both this and the determination of any future planning applications on these sites, NHDC consider a main modification to the SBC plan is required to reflect the agreed position of the two councils.
11. This will also ensure that any differences in the positions set out in the documents cited above and any other relevant representations or statements put forward by other parties are definitively dealt with.
12. The technical evidence which supports this position is set out below.

¹ Policy SP18 and paragraphs 4.212 to 4.214 (pp.69-70) and Site KB4 and paragraphs 13.192 to 13.194 (pp.178-179) of ORD1.

Stevenage School Planning Area, existing provision and future capacity

13. There are six secondary schools within the Stevenage SPA admitting pupils at Year 7. These are all located within SBC's administrative area. As shown in Table 1 below, these schools currently have capacity to provide places for 1,366 pupils each year.

Table 1: Number of Year 7 places available in Stevenage SPA 2016

NO	SCHOOL	School admissions 2016
103	Nobel (The)	240
105	John Henry Newman RC	240
106	Barclay (The)	196
108	Barnwell	270
112	Marriotts	240
116	Thomas Alleyne Academy	180
	Number of Year 7 places available	1,366

Source: Hertfordshire County Council²

14. Admissions information published by HCC is summarised in Table 2 below.

15. The number of places awarded at secondary schools within the SPA exceeds the number of applications for places from within Stevenage alone. This is to be expected and reflects the role of these schools in providing places for children within the wider SPA beyond the Borough boundary.

Table 2: Applications and allocation data

	2011	2012	2013	2014	2015	2016
Applications for secondary school places from within Stevenage Borough	990	923	904	960	968	946
Places awarded at secondary schools within Stevenage SPA	1,235	1,146	1,113	1,196	1,227	1,237

Source: Hertfordshire County Council² / NHDC analysis

16. It is evident that at least 200 school places are awarded at schools within the Stevenage SPA each year to children who are not resident in the Borough.

17. There is currently spare capacity within existing secondary schools.

18. Policy HC9 of the plan (LP1) identifies the former Barnwell East school site as reserved to meet secondary school needs.

² Collated from reports publically available at <https://beta.hertfordshire.gov.uk/services/schools-and-education/school-admissions/research-a-school/school-admissions-previous-years-statistics.aspx>

19. The Infrastructure Delivery Plan (TI1) identifies that this site has capacity for a five form of entry (FE) school³. TI1 further identifies capacity for an additional 2.5FE growth in existing schools in Stevenage⁴.
20. This provides a total potential capacity of 1,591 pupils per year⁵ for secondary schools in the Stevenage SPA over the plan period.
21. NHDC consider that SBC have soundly assessed future secondary education capacity within the Borough.

Projecting future demand

22. Paragraph 14 of the National Planning Policy Framework (NPPF) is clear that “*Local Plans should meet objectively assessed needs*”. This requirement is not qualified or limited to certain areas of policy; *all* relevant needs should be objectively assessed.
23. This is reiterated in NPPF paragraph 17 which requires that “*every effort should be made objectively to identify and then meet the housing, business and other development needs of an area*” (emphasis added).
24. The soundness of the Strategic Housing Market Assessment (as updated) (HP2, ED112) has been considered during the Stage 1 hearings. NHDC and SBC have jointly produced these documents and are in agreement as to their findings. No objection has been received from HCC in relation to these documents.
25. Future population growth is projected to be significantly concentrated amongst older age groups (c.f. comparison of 2031 vs 2011 population in figures 9 and 15). This pattern is repeated in the 2014-based SNPP which inform the updated ED112. These age groups will produce only minimal, if any, additional children.
26. On the presumption that the Inspector is minded to find the plan and evidence sound on the ‘Stage 1’ issues, it is logical that population figures which closely correspond to the objectively assessed housing need (OAHN) should inform the objective assessment of other population-driven elements of the plan, including education.
27. The 2014-based SNPP are the closest ‘match’ to the final OAHN for Stevenage. They are an appropriate objective basis against which to consider education requirements for the SBC plan⁶.

³ Page 49, paragraph 3.65. 1 Form of Entry (FE) is equivalent to 30 pupils. 5FE would provide capacity for an additional 150 pupils in each year group.

⁴ Page 50, paragraph 3.71

⁵ $1,366 + (5 * 30) + (2.5 * 30)$

⁶ The 10-year trend projections in HP2 and ED112 precede the adjustments to OAHN in response to market signals. The 2014-based household projections (which are, in turn, based upon the 2014-SNPP) suggest 7,491 households will form over the plan period (DCLG Live Table 406, <https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections>). ED112 suggests 7,418 households once the 10% uplift is applied. The difference between these two figures is 1%.

28. Appendix 3 analyses the projected secondary-age population in SBC over the plan period using this data. The maximum projected population in any of the Year 7 to Year 11 age groups is 1,240 pupils over the plan period.
29. This falls well within the 'ceiling' capacity of 1,591 pupils identified in paragraph 20 of this statement. Indeed they fall within the limits of *current* capacity within the Borough identified in Table 1.
30. The projected change between 2011 and 2031 varies across the different year groups. This is due to differences at the base year of 2011. However the projected increase balances out at the equivalent of 5.5FE when viewed across Years 7 to 11 as a whole.
31. Even allowing for some deviation from these projections over time, SBC have identified more than sufficient existing, planned and / or potential secondary age capacity to meet their own requirements over the plan period.
32. Furthermore, if the opportunities identified above and in Policy HC9 were brought forward, secondary schools in Stevenage should continue to provide substantial additional capacity to serve pupils from within the wider SPA. Considered against the 2014-based SNPP, there could be at least 11FE of additional capacity to continue absorbing demand from the relevant areas of both NHDC and EHDC.
33. NHDC request that the SBC plan be amended accordingly to make this position clear.

HCC forecasting methodology / alternate approaches

34. HCC adopt a different approach to the calculation of future education needs. This is set out in their Regulation 19 consultation response and gives rise to the purported requirements set out in the same document ⁷.
35. In summary, this relies upon a historic survey of development which identified an average pupil yield of 1FE for each 850 dwellings built. This is then adjusted to HCC's preferred ratio of calculating demand of 1FE per 500 dwellings. This methodology:
- Is predicated upon historic survey data;
 - Makes a substantial statistical 'risk' adjustment which results in HCC asking for up to 70% more places than the average yields their own survey would suggest (i.e. the difference between requesting provision at 1FE:850 homes versus 1FE:500 homes); and
 - Produces results that bear little resemblance to forecasts informing OAHN.
36. The approach suggested in T12 indicates that this HCC method would identify a requirement for 12.7FE of additional secondary education provision to meet SBC's

⁷ Response of Hertfordshire County Council (Estates) (Ailsa Davis) (ID: 975728)

proposed housing target of 7,600 homes⁸. This equates to an additional 380 children in each year group.

37. As Table 3 below shows, this is well in excess of the increases suggested by the 2014-based SNPP. In this respect, NHDC shares the concerns set out by SBC in TI1⁹.

Table 3: SNPP vs HCC method for Stevenage

Maximum projected increase in pupils over plan period (year)	2014-based SNPP	HCC Method	Difference
Year 7 (2022)	185	380	+105%
Year 8 (2023)	254	380	+50%
Year 9 (2024)	226	380	+68%
Year 10 (2025)	209	380	+82%
Year 11 (2026)	123	380	+208%
Years 7 to 11 (2031)	824	1,900	+130%

38. NHDC have previously requested that HCC conduct additional analysis to consider and justify this discrepancy, which is not isolated to SBC. No such work has been provided.

39. Although HCC advised the districts in 2016 of their intention to continue using the above approach, no specific modelling or background information has been made available by HCC for interrogation or objective analysis.

40. Any approach which purports to show a substantially higher (or lower) number of children than suggested by the SNPP and / or OAHN would necessarily need to rest on materially different projections of future population. This would have to lead to materially different conclusions on household and dwelling requirements than those identified in HP2 and ED112 and which SBC, with the assistance of NHDC, has defended.

41. Adopting the HCC approach without further justification could significantly undermine any conclusions reached on the soundness of these documents.

42. For these reasons, NHDC question whether the HCC approach can be considered the robust and objective approach to the assessment of educational need required by the NPPF.

⁸ Page 43, footnote 22 identifies the use of the 1FE:850 homes ratio for town centre development – estimated by the plan at ~3,000 homes - and 1FE:500 homes ratio for all other sites

⁹ See page 43, paragraphs 3.41 to 3.43 & page 49, paragraph 3.68

Appendices

Appendix 1 – Email correspondence between SBC and NHDC 12 January 2017

Appendix 2 – Map of Stevenage School Planning Area

Appendix 3 – Analysis of 2014-based subnational population projections for Stevenage

Appendix 1

From: Nigel Smith [mailto:]
Sent: 12 January 2017 11:20
To: Caroline.Danby
Subject: SBC Stage 2 statements - education

Hi Caroline,

I'm just starting on our statements for the Stage 2 hearings. Can you confirm your position on secondary education as there appears to be some inconsistency between various SBC documents as to whether or not you think there is sufficient capacity in the Borough to meet your own education needs?

The plan, including your proposed main mods, makes no reference to unmet education need. Our recent MoU, which postdates other documents in the examination library, agrees that Stevenage's plan makes sufficient education provision for the Borough's needs. I'm assuming that is the current position and the one you are taking?

Thanks
Nigel

Nigel Smith
Principal Strategic Planning Officer

North Hertfordshire District Council
Council Offices, Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

From: Caroline.Danby [mailto:]
Sent: 12 January 2017 12:17
To: Nigel Smith
Subject: RE: SBC Stage 2 statements - education

Hi Nigel,

Our position remains the same, yes (as that in our Local Plan, our reps to your plan and our joint MoU). Barnwell East is the only new secondary school we are proposing. HCC are not objecting to this, and we feel we have made adequate provision.

Thanks
Caroline

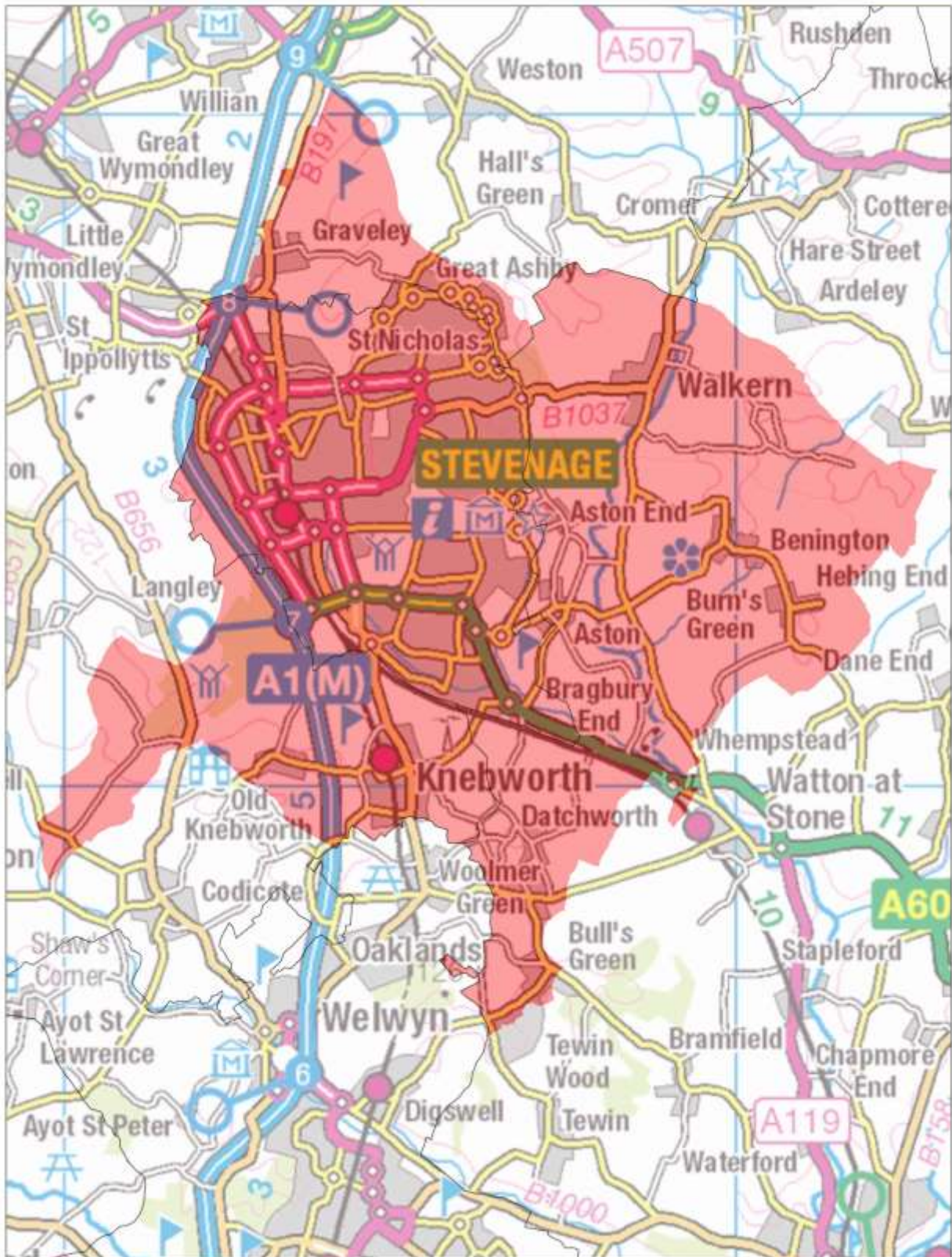
Caroline Danby | Principal Planning Officer | Planning Policy | Stevenage Borough Council |

Appendix 2 – Map of Stevenage School Planning Area

NORTH HERTFORDSHIRE DISTRICT COUNCIL



Stevenage School Planning Area



Scale: 1:80000
Date: 11:01:17

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Appendix 3: Projected secondary school age population in Stevenage Borough

School Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Year 7	1,052	943	952	1,010	982	967	1,042	1,135	1,124	1,119
Year 8	979	1,049	942	942	1,007	980	966	1,040	1,132	1,122
Year 9	1,003	974	1,052	936	941	1,004	980	965	1,039	1,129
Year 10	1,024	1,001	973	1,051	941	945	1,008	984	971	1,044
Year 11	1,117	1,029	1,007	978	1,056	949	952	1,013	992	979
Years 7 to 11	5,175	4,996	4,926	4,917	4,927	4,845	4,947	5,139	5,258	5,393
Year 12	1,113	1,124	1,026	1,023	987	1,062	956	959	1,020	1,000
Year 13	1,186	1,121	1,130	1,034	1,030	994	1,066	963	965	1,024

School Year	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
Year 7	1,199	1,237	1,199	1,165	1,151	1,171	1,180	1,190	1,200	1,210	1,219
Year 8	1,117	1,195	1,233	1,197	1,162	1,148	1,169	1,177	1,187	1,197	1,208
Year 9	1,120	1,116	1,192	1,229	1,195	1,161	1,147	1,166	1,175	1,185	1,195
Year 10	1,132	1,125	1,121	1,196	1,233	1,200	1,166	1,152	1,171	1,180	1,190
Year 11	1,052	1,139	1,133	1,130	1,204	1,240	1,209	1,175	1,160	1,179	1,188
Years 7 to 11	5,620	5,812	5,878	5,917	5,945	5,921	5,870	5,859	5,893	5,951	5,999
Year 12	987	1,060	1,146	1,142	1,138	1,212	1,248	1,218	1,183	1,169	1,188
Year 13	1,007	995	1,067	1,152	1,149	1,147	1,219	1,254	1,226	1,192	1,177

Source: ONS Mid-year estimates / ONS 2014-based population projections for Stevenage Borough / NHDC analysis
 ONS figures are based on mid-year (June 30th). School year estimates (September 1st) calculated on a pro-rata basis
 (e.g. Reception population for September 2011 would be based upon 10/12 of the age 4 population at Mid-Year 2011 + 2/12 of the age 3 population)

(continued)

School Year	Maximum projected population 2011-2031	Maximum minus population at 2011	Forms of Entry (FE) equivalent	Maximum minus current SPA capacity (1,366)	Forms of Entry (FE) equivalent
Year 7	1,237	185	6.2	-129	-4.3
Year 8	1,233	254	8.5	-133	-4.4
Year 9	1,229	226	7.5	-137	-4.6
Year 10	1,233	209	7.0	-133	-4.4
Year 11	1,240	123	4.1	-126	-4.2
Years 7 to 11	5,999	824	5.5	-831	-5.5
Year 12	1,248	135	4.5	<i>n/a</i>	<i>n/a</i>
Year 13	1,254	68	2.3	<i>n/a</i>	<i>n/a</i>

School Year	Maximum minus identified secondary schools capacity within SBC (1,591)	Forms of Entry (FE) equivalent
Year 7	-354	-11.8
Year 8	-358	-11.9
Year 9	-362	-12.1
Year 10	-358	-11.9
Year 11	-351	-11.7
Years 7 to 11	-1,956	-13.0
Year 12	<i>n/a</i>	<i>n/a</i>
Year 13	<i>n/a</i>	<i>n/a</i>