

## Growth & Infrastructure Unit



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By email to: [forward.planning@barnet.gov.uk](mailto:forward.planning@barnet.gov.uk)

Dear Sir/Madam,

### **Response to the Draft Regulation 19 (Publication) Local Plan**

The following response is sent by Hertfordshire County Council (HCC) Growth & Infrastructure Unit on behalf of Highways & Transport (HCC as Highways Authority) and Children's Services.

London Borough of Barnet (LBB) is located directly to the south of Hertfordshire. LBB's northern boundary is to the direct south of Hertsmere borough (one of the ten Hertfordshire local planning authorities [LPA]). Due to the interrelationship between Hertfordshire and LBB there are cross boundary, strategic infrastructure matters which are of interest to HCC that are commented on below.

#### **General Commentary (HCC highways)**

The growth that is proposed in the LBB Regulation 19 Draft Local Plan has been accounted for in HCC's transport modelling and transport work. HCC as highway Authority undertake annual modelling work to understand the impacts of development to the Hertfordshire transport network. This work also includes and accounts for growth beyond Hertfordshire, utilising government growth numbers and planning data to account for new development of residential and employment. Our method also includes a buffer zone around Hertfordshire where more detailed growth and settlement inputs are accounted for to best understand the impacts to Hertfordshire.

In its role as highways authority, HCC supports the local plan's approach to transport matters. The direction of growth to the most sustainable locations with good transport and active travel choices is endorsed by HCC. HCC's own Local Transport Plan seeks to support a similar ambition within Hertfordshire by supporting the creation of built environments that will encourage greater use of sustainable transport modes, and ultimately promote a shift away from use of the private car.

Whilst HCC supports, in principle, LBB's growth strategy as it relates to transport matters there are growth areas that will be of interest to HCC as development

proposals progress. Should the detailed planning applications, and associating transport assessments, relating to development sites identify impacts to HCC's transport network we would request early engagement on such matters and the opportunity to work collaboratively with interested parties to identify appropriate mitigations and solutions.

### **Secondary Education Provision in Borehamwood (Children's Services)**

It is anticipated that Hertsmere Borough Council (HBC) will be consulting on a Regulation 18 version of their emerging local plan later this year (2021). The local plan that is being developed for Hertsmere has been subject to previous consultations in 2017, and 2018, where representations made by HCC have indicated that an additional secondary school site would be required in Borehamwood to meet the need arising from any quantum of proposed growth locally. This is a key consideration at the time of this representation as the Hertsmere local plan consultation document is yet to be published, and the housing numbers in the growth scenario is yet to be finalised.

HCC has undertaken a secondary school site search exercise to identify an appropriate solution to meet the pupil yield need that will arise from future growth in the proximity of Borehamwood. The methodology utilised in the site search identified the required site size and site characteristics for a 8FE (form of entry) secondary school (in accordance with BB103); and completed a the sequential site search methodology used for searching for a site firstly in the urban area and then secondly in the non-urban area; and, finally completed an individual site analysis followed by site ranking.

The site search found that there were no suitable urban sites within Borehamwood itself. This was also the case when exploring the opportunity to deliver split school sites with the built form on one site, and a detached playing field site within a 400m walking distance of the main school site. The sequentially preferred site, which ranked first, following a highways and planning appraisal as a potential site for an 8FE is land south of A411/London Road. This site is in the ownership of HCC, and given the findings of the site search work is deemed as a deliverable solution to meet the secondary school need that is likely to be created by future development within Hertfordshire.

The land south of London Road site is a site that sits both within the administrative boundaries HBC (Hertfordshire) and LBB (Greater London). Further feasibility work has demonstrated that there is potential for the buildings required for the secondary school (and associated access arrangements) to be accommodated on land that is situated within Hertfordshire with playing fields and sports pitched located on land within the LBB.

In order to deliver the school, HCC are proposing that the area required for school buildings should be removed from the Green Belt if at all possible and allocated as a

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part of a 'school build zone' within an education allocation on the wider site. This in turn allows the education allocation to be effective, deliverable and comply with the NPPF. Our experience has been that leaving future education sites wholly within the Green Belt has not been acceptable to local plan inspectors.

As an example, this approach was accepted by the Inspector at the examination into the soundness of the Three Rivers Site Allocations document in 2014. Excluding the school building zones from the Green Belt would avoid the contradictory necessity of demonstrating very special circumstances at the planning application stage having been specifically allocated within the plan. The Inspector also stated that; *"the advantages of planning decisively by removing the building zones from the Green Belt for the specified purpose intended outweigh the disadvantages of the contradictory approach of leaving them within it, and by a very clear margin."* This technique allows indicative areas of playing fields, that comprise the remainder of the site, to form a part of the wider education allocation, but remain in the Green Belt. On that basis, HCC requests that is allocated for Education (playing fields) in an approach like that set out above.

HCC welcomes the opportunity to work collaboratively with LBB to mitigate the impact of planned growth that will have shared impacts across both authorities. I hope these comments are of assistance and if you require any further details, please do not hesitate to contact me.

Yours faithfully,



Sarah McLaughlin MRPTI

Head of the Growth and Infrastructure Unit