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Date: 31 March 2021

Dear Ms St John Howe

Welwyn Hatfield Borough Council Local Plan Examination – Supplementary Education Statement in respect of primary education provision within the Birchall Garden Suburb site

At the Welwyn Hatfield Borough Council (WHBC) Examination in Public session regarding *Policy SP 19: South East of Welwyn Garden City – SDS2* (the WHBC allocation of the Birchall Garden Suburb site) (Stage 9 Hearing Session on 4 March 2021), a number of questions were raised regarding education provision for that site. The Inspector has therefore requested specific additional information from the Education Authority clarifying the position of primary education provision for the SDS2 allocation of the Birchall Garden Suburb site. The responses to the Inspectors enquiries are set out below.

The enquiries were principally in terms of the matters raised by the promoters of the Birchall Garden Suburb site and their conclusion that a new primary school is now no longer needed within the Birchall Garden Suburb WHBC allocation.

Within their response to Local Plan Examination document EX227 the site promoters strongly disagree that a new primary school should form part of any reduced Birchall Garden Suburb allocation for the following reasons:

- 1) *“The extent of current and forecast capacity in existing primary schools in the Welwyn Garden City area, as evidenced both in Government data for those schools (<https://get-information-schools.service.gov.uk/>) and in County Council projections of pupil numbers (School planning | Hertfordshire County Council), may well be sufficient to accommodate the number of primary school pupils resident within any reduced BGS allocation, especially when the various new and enlarged primary schools being proposed in the area (including in the East Herts part of BGS) are taken into account.”* (paragraph 10 of the response)

- 2) “Even if such capacity is insufficient, an expansion of Commonswood Primary & Nursery School from a generally 2FE to a 3FE facility would be much more appropriate than the delivery of a small new school as part of any reduced BGS allocation.” (paragraph 11 of the response)

The County Councils responses to these points are set out below.

Current and Forecast Capacity of Welwyn Garden City:

Hertfordshire County Council forecasts demand for primary school places four years into the future. It is not possible to accurately forecast primary yield after four years as the children are not yet born. These forecasts are informed by the numbers of pre-school aged children registered with GPs as living in the area and take account of historic migration patterns as well as assumed pupil demand from an element of new housing expected to be built, occupied and yielding new pupils by 2023/24.

The forecasts provide information by Primary Planning Area (PPA). The town of Welwyn Garden City is split into two PPAs, Welwyn Garden City East and Welwyn Garden City West, although when planning school places the two PPAs are combined to take account of demand across the whole town.

Table 1 and Table 2 below set out the latest forecast demand in relation to both the Welwyn Garden City East PPA and Welwyn Garden City West PPA (published summer 2020), and the number of reception places available at each of the schools in the PPAs.

Table 1: Current Primary School Forecasts for the Welwyn Garden City East PPAs (published summer 2020):

12.4 WGC East										
School Code	School Name	Places Available	Actuals				Forecast			
			2020-21	2017-18	2018-19	2019-20	2020-21	2020-21	2021-22	2022-23
2027	Swallow Dell Primary School	60	60	59	59	59				
[2410]	[Springmead Primary School]	0	50	0	0	0				
2081	Springmead Primary School	60	0	51	48	40				
2140	Peartree Primary School	30	28	29	28	27				
2143	Holwell Primary School	60	58	58	59	57				
2240	Creswick Primary and Nursery School	60	61	61	57	56				
2296	Waterside Academy	30	21	29	22	21				
2356	Panshanger Primary School	30	30	30	29	30				
2446	Watchlytes Junior Mixed Infant and Nursery School	30	28	30	29	30				
2996	Commonswood Primary & Nursery School	60	60	59	60	58				
3382	Our Lady Roman Catholic Primary School	30	30	30	28	23				
3404	The Holy Family Catholic Primary School	30	24	27	27	17				
Total Year R Pupil Demand			450	463	446	418	433	457	421	423
Total Year R Places Available		480					480	480	480	480
Surplus or Shortage of Year R Places (No.)							47	23	59	57
Surplus or Shortage of Year R Places (%)							9.8%	4.8%	12.3%	11.9%
Surplus or Shortage of Year R Places (FE)							1.6	0.8	2.0	1.9

Table 2: Current Primary School Forecasts for the Welwyn Garden City West PPAs (published summer 2020):

12.3 WGC West										
School Code	School Name	Places Available	Actuals				Forecast			
			2020-21	2017-18	2018-19	2019-20	2020-21	2020-21	2021-22	2022-23
2142	Templewood Primary School	30	30	30	30	29				
2237	Harwood Hill Junior Mixed Infant and Nursery School	30	30	27	30	27				
2283	Homerswood Primary and Nursery School	30	28	29	30	29				
2454	Applecroft School	60	60	61	60	60				
3339	St John's Voluntary Aided Church of England Primary School, Lemsford	15	14	15	15	15				
Total Year R Pupil Demand			162	162	165	160	134	147	132	149
Total Year R Places Available		165					165	165	165	165
Surplus or Shortage of Year R Places (No.)							31	18	33	16
Surplus or Shortage of Year R Places (%)							18.8%	10.9%	20.0%	9.7%
Surplus or Shortage of Year R Places (FE)							1.0	0.6	1.1	0.5

In total, across both PPAs, 645 reception places are currently provided across the town.

Current forecasts indicate some surplus capacity at reception across the town. E.g. of the 645 available reception places 578 places were taken up in 2020-21 (418 in Welwyn Garden City East PPA and 160 in Welwyn Garden City West PPA). However, as outlined earlier, these forecasts do not take into account the significant level of housing growth proposed for Welwyn Garden City within the WHBC Local Plan beyond immediate new development, which has planning permission granted and is anticipated to be built and occupied within the forecast timeframe.

It is clearly neither reasonable or practical to be considering the situation as it is now. Instead the point at which the impact of Birchall Garden Suburb should be assessed is when children are starting to arise from the occupied homes. This is clearly a number of years in the future given that a planning application has yet to be granted planning permission let alone construction beginning and new homes being completed.

Significant numbers of new dwellings are proposed for Welwyn Garden City, which includes the proposed dwellings for the Birchall Garden Suburb site. The level of demand arising from them cannot be accommodated within the surplus places currently available in the existing schools and therefore additional capacity is required to ensure every child is able to access a local school place.

The current primary education mitigation strategy for Welwyn Garden City is through a new 2FE primary school at SDS1 (the Panshanger site at North East Welwyn Garden City), a new 2FE primary school at SDS2 (Birchall Garden Suburb), a new 3FE primary school within the East Hertfordshire District Council (EHDC) allocation of Birchall Garden Suburb and the rebuild of Peartree Primary School which will have a further 2FE of new provision. This totals 9FE of new primary education provision for Welwyn Garden City (and includes the mitigation of the Birchall Garden Suburb EHDC allocation).

By no longer including 2FE of mitigation, through the new 2FE primary school at Birchall Garden Suburb being removed, this would result in the proposed levels of growth for Welwyn Garden City being unable to be mitigated.

Furthermore, the latest GP registration data of the pre-school population, which informs the pupil forecasts, indicates more 0-4 year olds living in the Welwyn Garden City area than reception places available in the town in two of the four forecast years. The main reason that there appears to be sufficient spare capacity in the settlement is due to the current significant migration out of the town to the surrounding villages and Hatfield, with approximately 2 forms of entry (FE) of children living in the Welwyn Garden City East & Welwyn Garden City West PPAs attending a school in the neighbouring areas of Welwyn, Oaklands and Mardley Heath, Woolmer Green and Hatfield.

With the scale of housing growth proposed in these surrounding areas, local demand is anticipated to increase and, as admissions rules prioritise pupils based on distance, children from further afield will be less likely to gain a place. Therefore, the school places currently available in the surrounding areas cannot be relied upon in the future as the outflow from Welwyn Garden City would be stemmed as those areas fill up with more local pupils.

With the significant outflow in primary pupils no longer occurring any surplus primary capacity in Welwyn Garden City will disappear.

Therefore, based on the evidence provided above, the County Council has demonstrated that there will be insufficient capacity within Welwyn Garden City to be able to mitigate the significant numbers of primary-aged children arising from Birchall Garden Suburb and therefore the new 2FE primary school within the Birchall Garden Suburb allocation is still required.

Expansion capacity in existing primary schools in Welwyn Garden City:

Table 3 below provides the current County Council desktop advice relating to expansion potential within the existing primary schools across the Welwyn Garden City area.

Table 3: Expansion potential of primary schools within Welwyn Garden City

	Published Admission Number (PAN) 2020	Forms of Entry (FE)	Expansion Capacity
Welwyn Garden City East			
Holwell Primary School	60	2fe	None
Peartree Primary School	30	1fe	None
Swallow Dell Primary School	60	2fe	None
Our Lady Catholic Primary School	30	1fe	+1fe
Commonswood Primary and Nursery School	60	2fe	None
Creswick Primary School	60	2fe	None
Waterside Academy (formerly known as Rowans Primary School)	30	1fe	+1fe
Holy Family RC Primary School	30	1fe	+1fe
Panshanger Primary School	30	1fe	None
Springmead Primary School	60	2fe	+1fe
Watchlytes Primary School	30	1fe	+1fe
Total places available in WGC East	480	16fe	
Welwyn Garden City West			
Applecroft School	60	2fe	None
Templewood Primary School	30	1fe	None
Harwood Hill JMI & Nursery	30	1fe	+1fe
Homerswood Primary and Nursery School	30	1fe	None
St John's VA C of E Primary School	15	0.5fe	None
Total places available in WGC West	165	5.5fe	
Total places available in WGC	645	21.5fe	5fe

It may be possible to expand one school but not both.

It is important to note that whilst there is some limited expansion capacity at some primary schools within Welwyn Garden City, none of the schools with expansion potential are located within close proximity to the new Birchall Garden Suburb development (see Table 4).

Table 4: Walking distances from the edge of Birchall Garden Suburb to Welwyn Garden City primary schools with expansion potential:

School	Distance from Birchall Garden Suburb
Our Lady Catholic Primary School	1.9 miles
Waterside Academy (formerly known as Rowans Primary School)	2.8 miles
Holy Family RC Primary School	2.8 miles
Springmead Primary School	2 miles
Watchlytes Primary School	1.7 miles
Harwood Hill JMI & Nursery	3.3 miles

Table 4 clearly shows that only two of the primary schools with expansion potential are within 2 miles from the edge of Birchall Garden Suburb, which is the statutory walking distance for under 8s. Watchlytes Primary School is 1.7 miles away and Our Lady Catholic Primary School is 1.9 miles away. Firstly, Our Lady Catholic Primary School prioritises its admissions based on faith rather than distance and therefore cannot be relied upon to meet the needs of the majority of Birchall Garden Suburb families based on distance. This leaves only Watchlytes Primary School. Whilst Watchlytes Primary School is technically within 2 miles, this is measured from the edge of Birchall Garden Suburb. For the significant majority of Birchall Garden Suburb residents the school will be beyond 2 miles. Furthermore, relying on a primary school which is still a significant distance away from the site to mitigate the significant primary yield arising from Birchall Garden Suburb will result in unsustainable travel patterns which is therefore contrary to national planning policy and the Local Transport Plan.

The Birchall Garden Suburb site promoter specifically references Commonswood Primary & Nursery School as being able to expand and mitigate the primary education demand arising from Birchall Garden Suburb. Whilst Commonswood Primary & Nursery School is the closest primary school to the Birchall Garden Suburb development the County Council can confirm that it has no expansion potential. It has a Published Admission Number (PAN) of 60 and as can be seen in Table 1 above is full in almost all years (autumn 2020 school census data).

Professional advice from officers within the Property department of the County Council concludes that the current Commonswood Primary & Nursery School site is too small to accommodate a 3FE primary school. There are a number of constraints, including tree belts and wooded areas containing mature trees, and the allocation of much of the site as Urban Open Land constrains the site further. Therefore, there is not the physical capacity to allow for expansion of the school on-site.

Also, it is not possible for Commonswood Primary & Nursery School to expand further off-site into adjoining land. The Woodside Centre is adjacent to the Commonswood

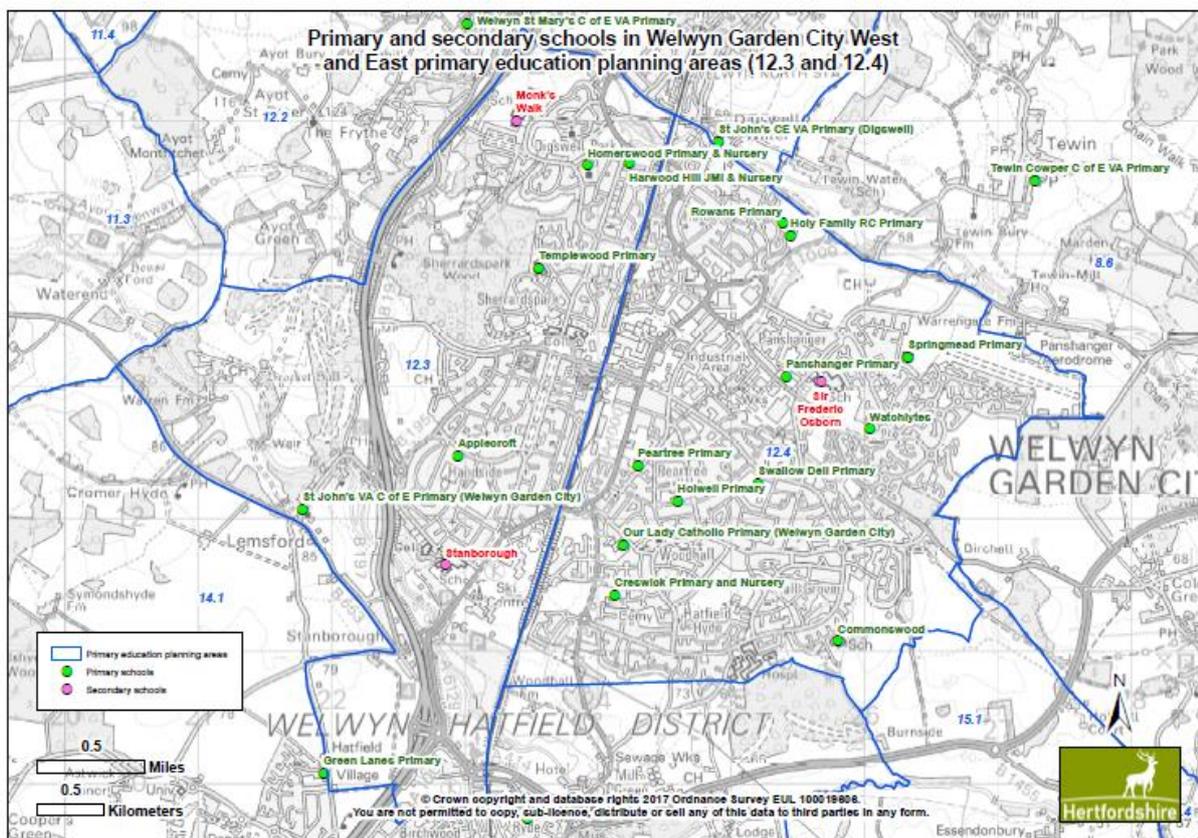
Primary & Nursery School, however, the Woodside Centre site has now been put forward for special school provision so an expansion into this area is not possible.

Justification for the continued need for primary education provision on-site at the Birchall Garden Suburb allocation:

Birchall Garden Suburb is a strategic new development site. The size of the development, and the number of primary education children likely to arise, is such that there is no justifiable reason that it should not be mitigating its primary education impact on-site. There is clear justification for Birchall Garden Suburb to provide the sufficient quantum of primary education provision on-site in order to serve the residents in its new community.

Locating primary schools locally and close to the children attending them enables children to walk to school, generating sustainable patterns of travel and movement. Without the 2FE primary school provision on-site at Birchall Garden Suburb significant numbers of primary-aged children will have to travel significant distances to access primary education provision elsewhere in Welwyn Garden City. Figure 1, below, shows the proximity of the existing primary schools in Welwyn Garden City to the Birchall Garden Suburb development.

Figure 1: Location of existing primary schools in Welwyn Garden City:



As can be seen from Figure 1, Birchall Garden Suburb is relatively isolated from the existing primary schools in Welwyn Garden City. Given the distances to these schools, if sufficient primary education provision was not provided on-site at Birchall Garden Suburb this would lead to substantial amounts of unsustainable travel as significant numbers of primary education pupils would need to be leaving the site to access primary education provision.

Schools, particularly primary schools, play a key role in developing and engendering a sense of neighbourhood and community cohesion for new residents. Without the 2FE primary school within the Birchall Garden Suburb site this crucial aspect of placemaking and developing sustainable new communities will be lost.

The Birchall Garden Suburb Policy (SP 19) in the submitted WHBC Local Plan explicitly states that the Birchall Garden Suburb will be planned *“to create a new sustainable community incorporating Garden City principles”*. Without the 2FE primary school within the WHBC allocation of Birchall Garden Suburb it will not be mitigating its primary education impact and therefore, for the reasons set out above, will not be creating a “sustainable community”.

At the local plan stage Hertfordshire County Council currently calculates primary pupil yield based on a ratio of 1 Form of Entry (FE) of need arising from 500 dwellings. Together with the allocation in the East Hertfordshire District Council District Plan the total number of dwellings for Birchall Garden Suburb is now proposed to be approximately 1,950 dwellings. This equates to approximately 4FE of primary education need.

Based on this need the County Council considers primary education mitigation at Birchall Garden Suburb should be in the form of 1 x 2FE primary school within the East Hertfordshire District Council allocation (with the ability in the longer term to potentially expand to 3FE, in light of the significantly higher levels of development proposed for Welwyn Garden City as a whole); and 1 x 2FE primary school within the WHBC allocation. This would provide an appropriate and balanced pattern of primary education provision to serve the new communities at Birchall Garden Suburb.

Conclusion:

To conclude, Hertfordshire County Council, as Education Authority, has a statutory duty to provide school places for all children in the county. The County Council has demonstrated that any current spare capacity within the existing primary schools in Welwyn Garden City will be taken up by local demand from push back of significant numbers of Welwyn Garden City children who currently attend primary schools outside of the settlement, and from other development due to come forward in Welwyn Garden City. Therefore, any existing spare capacity is unlikely to be present at the point that children start to arise from the Birchall Garden Suburb development and cannot be relied upon to meet the primary education needs arising from Birchall Garden Suburb.

The promoters of the Birchall Garden Suburb allocation state that there may well be sufficient spare capacity to accommodate the number of primary school pupils arising from any reduced Birchall Garden Suburb allocation. However, the County Council within this Statement has demonstrated that this is not the case.

There is limited expansion potential of existing primary schools in Welwyn Garden City. Furthermore, those with expansion potential are significant distances from the Birchall Garden Suburb site. Relying on this provision will lead to a significant movement of children off-site, which due to the distances is likely to result in unsustainable travel patterns.

In particular, the assumption being made by the promoters of the Birchall Garden Suburb allocation that children from their development can be mitigated through a 1FE expansion of Commonswood Primary & Nursery School is incorrect. Commonswood Primary & Nursery School does not have the ability to expand either on its current site or onto adjacent land.

Given that Birchall Garden Suburb is relatively isolated from the existing primary schools in Welwyn Garden City this means that by not including the 2FE primary school on-site, and there being insufficient on-site primary education mitigation, there will be significant numbers of primary aged children having to leave the Birchall Garden Suburb site and travel significant distances for primary education provision.

Schools play a crucial role in the development of new communities. Without Birchall Garden Suburb mitigating its education impact on-site, including through a new 2FE primary school within the WHBC allocation, this essential element of placemaking, neighbourhood development and community sustainability will be lost, with a detrimental impact on the new residents.

The County Council questions whether Birchall Garden Suburb is a sustainable development and sustainable community, able to meet its own policy requirements, without the inclusion of the 2FE primary school.

Based on the information contained within this Statement the County Council considers that it has clearly justified and provided sufficient evidence as to why there is a continued need for a 2FE primary school to be part of the WHBC allocation of Birchall Garden Suburb. No reasonable or appropriate evidence to the contrary has currently been provided.

The County Council trust that this information is of assistance. However, please do not hesitate to contact me should you need any clarification in relation to the information in this Statement.

Yours sincerely

A black rectangular redaction box covering the signature of Antony Proietti.

Antony Proietti

Growth Area Team Leader (North East Growth Area), Growth & Infrastructure Unit