



RSRP Update – 8 November

Current Status

At present the Town Planning Application for the Katherine Warrington School remains open for Consultation. The process is being handled by Hertfordshire County Council, who are also listed as a joint applicant alongside Education and Skills Funding Agency (ESFA). The Agent handling the Application is Vincent & Gorbing Associates.

After many changes, including the removal of Site notices, the current closing date (for public consultation) is 16 November. Representations can be made via the HCC website – where a series of questions and a 3900 character box is available for comments.

Alternatively you can make representations by e-mail to

spatialplanning@hertfordshire.gov.uk or by post:

Spatial Planning & Economy Unit
County Hall CHN216
Pegs Lane
Hertford
SG13 8DN.

The online form has some compulsory fields and you are recommended to include details that are requested in these. The key pieces of information are:

Name (title, first name, Surname); Address;

and an indication of one of the following about your representation:

Support the Application / Object to the Application / Have Concerns / No Comment

You have an option to include an email address for acknowledgement / response. At RSRP's drop-in session in October a number of written entries were completed and these were delivered to HCC by RSRP during the following week. HCC have been acknowledging these forms.

RSRP's Current Position

RSRP's approach has continued to be one of reviewing evidence and assessing the requirements. We have continued this approach with the publication of material for the Application – based on our assessments of the wealth of published material, our position remains that the site is a wholly inappropriate site for a school as it does not serve the need on a local basis and as a result is not an appropriate solution. This is compounded by the unacceptable risks placed on local prospective pupils, which have been compounded by a failure to address safe travel mitigation measures for prospective pupils, and the associated adverse impacts on the community both in the immediate vicinity and across the wider area.

It is our view that far better alternatives exist to provide safer and most cost-effective education for pupils and that HCC's continued delaying in addressing the issues is no reason for accepting a seriously flawed solution. It is seven years since HCC conceived its plan for the site, four years since it announced its intention and over two and a half years since it refused to discuss any aspect of its plan with those affected by it (until Planning).

Grounds for Objection

There are many causes for concern within the plan. In many instances the information provided in the Planning Application has heightened concerns. Key aspects are:

Green Belt Impact: The application requires release of Green Belt land. There is no Local Plan designation for the site that predetermines release, therefore any release has to meet 'Very Special Circumstances', for which the guidance comes from national planning policy which presumes in favour of Green Belt retention. The Applicant is then required to demonstrate there is such a strong case that considerations outweigh standard Green Belt. In this instance the case is wholly reliant on HCC's prediction of long term need for school places – a system that HCC has acknowledged to be at fault in respect of localisation of need (see our submission to SADC for more detail). The VSC requirements include proper consideration of alternatives – HCC excluded the most sensible alternative – locating a school in or near Wheathampstead – in 2010, about the time the sale of the former school premises for housing development was taking place. The choice of the Batford site counters a number of Green Belt criteria, notably coalescence – the joining of two urban developments – and urban sprawl – particularly as HCC chose to not purchase land adjacent to the current developed boundary, requiring buildings to spread further into Green Belt and providing an argument for infill housing on what will become less purposeful green belt land. The core objection is therefore this is inappropriate development of Green Belt on basis that better alternatives have not been properly considered. (See our submission to SADC for more detail on the failings of HCC's forecasting system).

Traffic and lack of Mitigation: The expected impact of traffic resulting from the school is a significant factor. HCC are responsible for producing supporting arguments for both expected traffic flows and for the mitigation measures to alleviate traffic related problems. In 2015 HCC's consultants advised a £6.5m spend, which many experts considered minimal to counter expected large flows of traffic along the Lower Luton Road and every other rat-run that is likely to be adopted when the LLR congests. Pinch points were identified, many insurmountable, and this led to concerns about the safety of suggested walk and cycle routes for children - effectively along the Lower Luton Road from Wheathampstead – the alternatives being use of unlit, single track winding lanes to the north of the school or hidden tracks in the Lea Valley. The £6.5m identified in 2015 has been removed from HCC's budget estimates – the application contains instead a series of minor mitigations which in many instances are likely to frustrate motorists and put pedestrians at greater risk. For example lights at Station Road / Lower Luton Road are planned to be removed and zebra crossing installed on a widened junction. The plan fails to address the use of Lea Valley and Crabtree / Marquis Lanes as drop off zones – other than by adding humps in road, while removing the roundabout at the Common Lane / Lower Luton Road junction is liable to recreate the safety problem the roundabout was first introduced to correct.

The greater problems with traffic however are likely to stem from the failure to address the need to widen the Lower Luton Road between Wheathampstead and Batford, and the failure to accurately predict the flows of school traffic. The school will be the 'nearest in priority area' for Wheathampstead, Kimpton, Whitwell yet only 1 in 3 Wheathampstead pupils are expected to attend the school (225 pupils of approx.650 applicants over seven years), raising the question of where are the rest expected to attend? And critically how do they travel. If every school in the area is in Harpenden Town it is estimated that up to 2,000 pupils a day will travel in to the Town as only 60% of applications in the area come Town.

Visual Impact: The application states it has considered the impact on the area from the worst affected views – it does not define these areas and is filled with carefully taken photos of small corners of the fields obscured by garages and house walls, or photos of narrow entrances to footpaths, rather than the views over the fields from the paths. In practice there are no views from the main vistas from Crabtree across the fields, no views from Milford Hill or Batford estate roads that look over the fields and bizarrely the report claims the view from the Lower Luton Road will be screened by retaining the hillside, while the building elevations portray a view from the Lower Luton Road that shows the main building obliterating the entire northern skyline (some 35 m above the level of the Common Lane / Lower Luton Road junction. The development remains one which will create large areas of dug out land, and large areas of raised platform land – notably in the Mackeyre End area where sports pitches require up to 20 ft. increase in the levels – and don't be under any illusion on lighting – the initial plan may not contain pitch lighting, but Sport England have already called for the hilltop pitches to be illuminated for night time use. In essence this will be a highly visible development with major change in the form of the landscape – a change that is not compatible with former use nor does it blend with surrounds – it will be a stark contrast.

The view coming out of Batford estate from Milford Hill will be dominated by the stark wall of the Sports Hall – estimated to be more than twice the height of the current hedge line and, although proposals suggest retention of the tree line to partially screen this bland feature, HCC have chosen not to purchase that land so have little influence over its future use. The entrance – or entrance and exit to the school - will be situated on the Lower Luton Road – a road that is planned to be widened (on the hill) to provide a third lane for turning in and out, and to create visibility it will necessary to cut away more of the hillside so that the visible impact of the road will be substantially increased.

Value for Money and associated risks: The school project was costed at between £53-65m when HCC's consultants evaluated the project in 2015. This was about £20m more than DfE expect to fund and excluded land costs. In the supporting material the cost estimates have been reduced by between £8-10m – while a large part of this is removal of transport safety mitigation, it is also apparent that the design previously evaluated did not have large earthworks near Mackerye End and now that a substantial plateau of earth, towering nearly 30m above the main floor of the school has been proposed there is no apparent increase in the retaining wall estimates – the same distance of wall is allowed for and the cost of creating and maintaining the plateaus in a stable and safe manner is a mere £1m. This appears like a further significant cost cutting exercise and begs the question of where else have costs been removed from the project, and at what risk to safety. Initial work undertaken by HCC / ESFA contractors suggested that 111 parking places would be provided (May 2017) – this has been cut to 97, barely enough for the full time staff count, increasing the likelihood of external parking and implicit risk to neighbours and nearby pedestrians and road users. In essence the choice of site is a very expensive one to develop and it appears there is a willingness to cut costs from the start.

In summary there are many areas of challenge – some of these are covered in more detail in RSRP's submissions to the Section 10 Consultation (which closed in late October) and to SADC who are consultees in the process (see our main page to view or download). Wheathampstead Parish Council, despite not being included as a statutory consultee on a development that is partly in their parish, did complete an assessment in late October – Harpenden Town Council have deferred their consideration to a full Council meeting due 27 November and have sought dispensation for a late submission. St Albans are due to

deliberate on the plans in the near future – RSRP think this is also likely to be on 27 November but as yet SADC has not published details of this and the opportunity for public involvement. RSRP recommends that if you feel strongly you continue to raise your objections with your local Town / Parish / District And particularly County Councillor as all such processes have the ability for Councillors to put forward your views. Most of the meetings are open to public attendance, and some are recorded or even broadcast live.

At present we understand HCC are targeting the meeting of the Development Control Committee on 20 December to review – though this will not be confirmed until nearer the date. In the meantime RSRP has a number of challenges lodged with HCC concerning aspects of this application and contributory matters – we will update on progress of these and advise on our work to analyse in detail the planning application support material nearer to the closing date. We have raised the difficulty of being able to do so when significant documents are missing from the pack published by HCC and note that there has been a minor move in schedule (from 14 November to 16 November) to accommodate publication of some missing information.

ENDS