

Bishop's Stortford Civic Federation

Registered Charity Number R264557

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27 January 2017

Mr Chay Dempster
Spatial Planning and Economy Unit
CHN216, County Hall
Hertford
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SG13 8DN

Dear Mr Dempster

3FE JMI SCHOOL
FARNHAM ROAD BISHOP'S STORTFORD
YOUR REF: PL10822116

Appendix VI
Bishops Stortford Civic Federation letter
27 January 2017

1. I am writing on behalf of the Bishop's Stortford Civic Federation to make representations about this planning application.
2. The Civic Federation agree that the development of Bishop's Stortford North (BSN) including all of ASR's 1-5 is likely to generate a need for 5 FE of JMI places and that these should be provided at suitable locations within the area to be developed so that they are within walking distance for the great majority of the prospective users of the facilities. We also note that planning permission has already been granted for a 2 FE school on ASR's 1-2, a 2 FE school on ASR's 3-4, and a 1 FE school on ASR 5. We do not disagree with the view of the County Council that it would be preferable to provide a single 3 FE school rather than two separate schools to meet educational needs in the eastern parts of the overall development.
3. But we are concerned that holding out for a 3 FE school might lead to the best being the enemy of the good, with the JMI places needed to support the BSN development being delivered long after the need for them arises, whereas a 1 FE school on ASR 5 can be brought on stream at the same time as the housing. As well as the issue of timing, we also have concerns about the deliverability of the proposal, its wider implications, the interim arrangements and the traffic implications.

Timing of Delivery

4. Like so much of the planning of BSN as whole, delivery is occurring back to front, with ASR 5, the least accessible and the one most dependent for community facilities on the rest of the development, starting first on site. The proposed 3 FE school is an add on to ASR 4 where, at the current rate of progress, construction work seems unlikely to start within the next 5 years, meaning that the majority of parents needing places at that school will not be able to move into their new homes for about 8 to 10 years. If the demand has to arrive before the school gets off the ground, where are the children of the residents of ASR 5 who will start arriving in a year or two's time to be educated in the meantime?

Deliverability

5. We understand that the site in question is owned by Bishop's Stortford Town Council. It is, of course, open to anyone to lodge a planning application on any site, regardless of ownership. However, given that we are looking at a prospective transaction between two public authorities, we find it surprising that, so far as we are aware, no offer has been made by the County Council to acquire the site, and no decision has been made by the Town Council to sell it for this purpose. No doubt, it is for this reason that the applicant suggests no timescale for the delivery of the proposal and, at the present time, there is no particular reason to believe that it will ever be delivered. In the meantime, work has already commenced on phase 1 of ASR 5 which will presumably be completed and occupied over the course of the next two years.

Wider Implications

6. At present, the site is not allocated for development in any of the planning permissions granted for BSN. Instead, on ASR's 3-5, planning permission has been granted for two schools on sites within the areas to be developed. This application is intended to provide a substitute for the two schools which have planning permission, and no doubt the developers will expect that those sites will be released to be used for further housing. So far as we are aware, no planning applications have been made for the alternative use of the sites, and so how much extra housing can be crammed in must be a matter of speculation, but perhaps 300 more dwellings might be a reasonable assumption.

7. However, because the transport assessment merely relies on the conclusions reached about the existing planning permissions and makes no allowance for the impact of the additional housing that will undoubtedly follow (or perhaps precede) this proposal if permission is granted, its conclusions cannot be relied upon. No doubt, if permission is granted for this application, and applications for further housing follow on the sites to be released, they too will be treated like this one as one needing only a standalone traffic assessment and the cumulative impact of enlarging the overall scale of the BSN development ignored. This kind of salami slicing to minimise the apparent effects of successive developments and ignore their cumulative impact is one with which we are all too familiar in traffic assessments in Bishop's Stortford.

8. We also note that granting permission would lead to a further loss of open space at a time when Bishop's Stortford is facing its biggest ever housing development. The Bishop's Stortford Natural History Society has made a proposal that the area adjoining the Bourne Brook should become a dedicated nature reserve. This application makes no provision for it and indeed would prevent it from being realised. There ought surely to be sufficient room to provide for a 3 FE school within the areas of BSN which have been allocated for development. After all, the land take for a single school should be significantly less than that required for the two schools which already have planning permission.

Interim Arrangements

9. The forecasts produced by the County Council anticipate demand for JMI places tailing off in the next few years. Indeed this has been their consistent message for some time now. But there does appear to be an underlying flaw in their forecasting methodology. Whatever it is, it has led to SOS calls to JMI schools in Bishop's Stortford to provide extra 'bulge' classes to meet unanticipated demand in each of the last three years, a very inefficient way of meeting demand. ASR 5 can be expected to generate almost another 1 FE of demand at a time when no school would have been provided on the site itself if this application is granted permission, since any such facility would soon become redundant.

10. All our other JMI schools are full and some considerable distance away from ASR 5. EHDC was therefore persuaded to grant planning permission for ASR 5 to go ahead in advance of the

rest of the BSN development only on the basis that the demand for school places which it would generate would be provided on site at the time the new homes were occupied. Granting permission for this application as a substitute would undermine the basis on which permission for ASR 5 was granted.

Traffic implications

11. It is clear that as well as anticipating the overall consequences of implementing this proposal (more housing on BSN as a whole) a robust traffic assessment for this application needs to look at the interim position when no new school has been provided but ASR 5 has been completed and occupied. All parents with school age children (secondary as well as primary) will need to drive their children to school. What impact will that have on the existing road network and how many of the improvements (minimal though they are) will have been completed? Planning permission for ASR 5 was granted on the basis that there would be a JMI school on site and a secondary school near the A120 bypass already in operation, neither of which seems likely in the near future. We are particularly concerned about the impact on Rye Street.

Conclusion

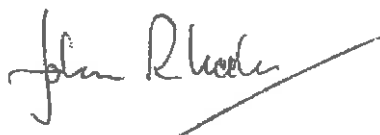
12. Taking all these considerations into account, we believe that this application should be withdrawn so that a properly phased plan for educational provision and the traffic implications of that phasing can be included in any revised application. We further believe that no justification has been made for the loss of open space which would result or the loss of the Bourne Brook corridor as a potential nature reserve. There ought surely to be space for a single school of this size within the parts of ASR's 3-5 which have already been zoned for development. We can only assume that, as has happened with the provision of the secondary school on BSN, the desire of HCC's estates department to maximise the development gain from its property portfolio has taken priority over providing additional school places at the time they are needed.

13. If, nevertheless, the Council decides to grant itself planning permission, it needs to attach effective conditions about timing to that permission. The applicant 'offers' as a condition that development should start within 5 years of the issue of the notice. This is in fact no more than a standard term that applies to any planning permission, and failure to observe it causes the permission to lapse. Merely putting in some foundations before the deadline is then sufficient to make permission indefinite.

14. Instead what is needed is a condition requiring that the school is ready for occupation no later than 4 years after the issue of the notice so as to minimise the gap between the ASR 5 houses being occupied and the school opening. Furthermore, no application for housing on the sites to be released as a result this application should be entertained until it is clear that the school will indeed be ready for occupation within the time specified in this condition. This will enable a 1 FE school to be built on ASR 5 if the provision of a 3 FE school drifts off into the indefinite future.

15. I am copying this letter to County Councillors Barfoot and Woodward, District Councillors Warnell and Gary Jones, Stephen Tapper at EHDC's Planning Department and James Parker CEO of Bishop's Stortford Town Council.

Yours Sincerely



JOHN RHODES
PRESIDENT

