

Growth & Environment
Executive Director: Mark Doran



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

Growth & Infrastructure Unit
Hertfordshire County Council
Postal Point: CHN114
Farnham House
Six Hills Way
Stevenage, Hertfordshire SG1 2FQ
www.hertfordshire.gov.uk

Respond to: growth@hertfordshire.gov.uk

20 March 2026

Dear Planning Officer

**Response by HCC's Growth & Infrastructure Unit to 25/03080/HYA
GA2, Land North-East Of Great Ashby, Stevenage, Hertfordshire**

I am writing in respect of planning obligations sought towards non-transport services to minimise the impact of development on Hertfordshire County Council Services for the local community. Based on the information to date for the development of **640 dwellings** we would seek financial contributions towards the following projects:

HOUSES		
Number of Bedrooms	A) Open Market & Shared Ownership	B) Affordable Rent
1	0	0
2	98	37
3	216	42
4+	80	19
Total	394	98

FLATS		
Number of Bedrooms	A) Open Market & Shared Ownership	B) Affordable Rent
1	42	32
2	38	36
3	0	0
4+	0	0
Total	80	68

Trajectory						
Year	2026	2027	2028	2029	2030	2031
Units	0	75	150	150	150	115

PLEASE NOTE; If the tenure or mix of dwellings changes, please notify us immediately as this may alter the contributions sought

Primary Education

Level of Provision

We welcome the provision of 4 hectares of land for delivery of the on-site primary school and reserve education land as per policy requirement. We also welcome the inclusion of nursery capacity within the new primary capacity. Based on impact likely to arise from the quantum of housing detailed above, the 640 homes will require 1.6FE of mitigation based on the strategic planning ratios. This development is considered cumulatively with GA1 (planning application 24/02889/FP for 281 dwellings). HCC is seeking the delivery of a new 1FE primary school on GA2 (this development) with a land area of 1.15ha. This will be funded proportionally between the two sites. Therefore the total dwellings being 921 meaning GA2 (this development of 640 units) is responsible for 69.5% of the costs, with GA1 responsible for the remaining 30.5%.

HCC notes that paragraph 17.55 and 17.57 of the provided Environmental Statement – Cumulative section includes estimated numbers of pupils, which have been calculated based on the DfE Pupil Yield Data Dashboard. However, the DfE is clear in its guidance (Estimating pupil yield from housing development - https://assets.publishing.service.gov.uk/media/64d0f71be5491a00134b5940/Estimating_Pupil_Yield_from_Housing_Development.pdf) that use of the DfE pupil yield dashboard is not mandatory. The DfE state that “Where local authorities have robust local evidence of different pupil yields than those shown in DfE’s data, these yields can be used instead of our pupil yield data.” (paragraph 13, Estimating pupil yield from housing development). Furthermore, the DfE considers local evidence of different pupil yields to be robust if it is “transparent, based on a representative sample of housing developments, clearly explained and well-reasoned”. HCC considers that this is the case for its methodology and pupil yield figures and therefore there is robust justification for the position of seeking for a new 1fe of primary education provision on site with proportionate contributions from this development site. Furthermore, the DfE guidance states that “When pupil yield evidence has been tested and validated through a local plan or CIL Charging Schedule examination, planning appeal, or Judicial Review, it should be accepted without further challenge unless there has been a significant material change in circumstances since that time.” It is important to note that HCC has successfully had its methodology tested and validated at appeal (e.g. Buntingford Appeal, APP/J1915/W/24/3340497) so should not have to provide any further evidence on its pupil yield figures and the robustness of the information.

Transport to school

It is likely that the new development will yield new children before the county council delivers the new on-site school provision. It is also understood that a 1FE on site school will not mitigate the full pupil yield arising from this development, therefore pupils will be travelling off site to existing schools as a day to day position. It would therefore be useful to understand and have clarification on the sustainable links both

from the site to existing school provisions. This will need to include where any necessary links are to be and when they are proposed to be delivered.

Site Areas

The land area of 1.15ha proposed for the new primary school project and the remaining 2.85ha for reserve education land have had their information sent for review against the HCC land specification already with sign off provided on the elements seen to date. The land specification will become a part of the S106 legal agreement and therefore further refinement to meeting the land specification in full will be welcome and ultimately necessary to avoid delays in the future site delivery. HCC will require a conversation on indicative call for dates for the primary education land and possible flexibility associated with this.

The land transfer call for date trigger will have the addition within the legal agreement of "...unless a different occupation trigger is agreed in writing by the County Council". This is to add some flexibility to the trigger.

The financial contribution is proposed to be paid in triggers; 50% prior to commencement, 50% prior to first occupation.

Therefore HCC will require the following planning obligations to mitigate the impacts of this development; towards the delivery of a new on-site 1FE primary school on the development and/or provision serving the development (**£4,449,526 with land cost including deduction of £30,322 index linked to BCIS 1Q2025 and regional factor**). HCC also requires a 4ha education site of which 1.15ha is for a new 1fe primary school and 2.85ha for reserve education land.

Secondary Education Contribution

HCC uses the Hertfordshire Demographic Model to assess pupil yield build up. The methodology behind this can be found here:

<https://www.hertfordshire.gov.uk/media-library/documents/environment-and-planning/planning/developer-infrastructure-contributions-guide/guide-to-the-hertfordshire-demographic-model.pdf> &

<https://www.hertfordshire.gov.uk/media-library/documents/environment-and-planning/planning/developer-infrastructure-contributions-guide/pupil-yield-survey-methodology.pdf>. HCC will require off-site mitigation for secondary education for this development. HCC will require the following planning obligations to mitigate the impacts of this development; towards new secondary education provision at the former Barnwell East site/land at Redwing Close and/or provision serving the development (**£6,122,262 index linked to BCIS 1Q2024 and BCIS Regional Factor**)

HCC proposes that the contribution have split triggers of 50% prior to commencement and 50% prior to first occupation.

Nursery Education Contribution

included in the Primary Education Contribution

This covers children aged 3-4 years old. The county council will provide new nursery places for 3-4 year olds at the new primary school on site. This in accordance with DfE guidance *Securing Developer Contributions for Education*, which recommends that all new primary schools should come with a nursery and that developer

contributions may be used to fund this requirement. The cost of including the nursery provision in the new primary school is included within the cost of the new primary school outlined above and therefore will not be paid separately.

Childcare Contribution

0-2 Year Olds

The county council has a statutory duty to ensure sufficient childcare provision under the Childcare Acts 2006 and 2016 notwithstanding that the private, voluntary, and independent sector will usually deliver places. The development is expected to yield approximately 129 0-2 year old service users whose parents are likely to seek childcare. The extent of the yield is driven by the Government's offer of free childcare which has seen very high uptake. HCC will therefore require planning obligations towards increasing the capacity of 0-2 year old childcare facilities in the North Stevenage Family Centre Reporting Locality, a provision at the new community centre on-site would be a possibility, and/or provision serving the development (£1,462,679 index linked to BCIS 1Q2024).

5-11 Year Olds

The county council will secure childcare provision for 5-11 year olds at the new primary school. This form of childcare must be delivered at the same school where the child is receiving primary education, as its purpose is to allow parents to work while children receive care around core school hours. Parents will therefore be unable to use provision at any school elsewhere in the area. Financial contributions will therefore be towards increasing the capacity of 5-11 year old childcare facilities at the new on-site primary school and/or provision serving the development (£8,563 index linked to BCIS 1Q2024)

Special Educational Needs and Disabilities (SEND) Contribution

Increasing numbers of pupils are attending SEND schools and HCC is having to increase its overall level of provision in response. This includes from pupils yielded from new developments, such as this development. Current SEND school provision is unable to mitigate the proposed growth in the area. HCC therefore requires planning obligations from this development towards new Severe Learning Difficulty (SLD) special school places (EAST) and/or provision serving the development (£1,057,838 index linked to BCIS 1Q2024 and BCIS Regional Factor).

Library Service Contribution

towards the re-provision of Stevenage Library and/or provision serving the development (£169,617 index linked to BCIS 1Q2024)

Youth Service Contribution

towards increasing capacity through the reconfiguration of Stevenage Young Person's Centre and/or provision serving the development (£152,129 index linked to BCIS 1Q2024)

Waste Service:

The county council has responsibility over disposal of local authority collected waste and management of the recycling centre network. We are expanding the capacity of our waste transfer and recycling centre facilities as there is significant growth coming

forward for which the current facilities/provision need increased capacity in order to mitigate. This will ensure that new developments such as this have suitable waste disposal provision.

Recycling Centre Contribution towards increasing the capacity at Stevenage Recycling Centre and/or provision serving the development (£3,641 index linked to BCIS 1Q2024)

Transfer Station Contribution towards increasing capacity through the new Northern Transfer Station and/or provision serving the development (£169,806 index linked to BCIS 1Q2024)

Fire & Rescue Service

New developments bring forward an increased risk of incidents, changes the risk profile for the area and increases attendance times to incidents. Stevenage Fire Station does not have sufficient capacity to accommodate the additional, cumulative, growth proposed for the area, which includes this development and therefore a contribution is required from it to provide additional capacity at this fire station. Therefore HCC is seeking financial obligations towards increasing operational capacity through the provision of new appliances and/or equipment necessary to support additional fire and rescue service delivery at Stevenage Fire Station and/or provision serving the development (£15,917 index linked to BCIS 1Q2024)

PLEASE NOTE THE FOLLOWING:

Consult the Hertfordshire Fire and Rescue Service Water Officer directly at water@hertfordshire.gov.uk, who may request the provision of fire hydrants through a planning condition.

Monitoring Fees

*HCC will charge monitoring fees. These will be based on the number of triggers within each legal agreement with each distinct trigger point attracting a charge of **£420 (adjusted for inflation against RPI January 2024)**. For further information on monitoring fees please see section 5.5 of the Guide to Developer Infrastructure Contributions.*

Comments from HCC on the provided supporting documentation for this planning application;

Planning statement

6.34 – states that a Care home is not deliverable or commercially viable at GA2 –
6.41 – Includes a future use of the reserved school land, HCC would like to note that this land will be subject to refund clauses set out in the legal agreement.

Environmental Statement – Socio Economic

Table 13.9 at page 18 – this table lists some of the schools in Stevenage NE Primary area. The tables provided and the one below from HCC are at a point in time. The table provided by the applicant misses a number of school in the pupil planning area. The below table from Autumn 2025 pupil census shows actuals which are very different from the table provided by the applicant, painting a different picture of surplus.

Autumn census 2025

School Name	School status	School type	PAN	Total capacity	Total Pupils	Spare capacity	R	1	2	3	4	5	6
Lodge Farm Primary	Community	Primary	60	420	355	65	38	40	56	56	51	58	56
Martins Wood Primary	Academy	Primary	60	420	456	-36	58	47	57	85	65	75	69
Camps Hill Community Primary	Academy	Primary	60	420	390	30	57	53	55	53	58	58	56
Moss Bury Primary School & Nursery	Community	Primary	30	210	205	5	29	28	29	31	27	31	30
Trotts Hill Primary and Nursery	Community	Primary	30	210	210	0	30	29	30	30	30	30	31
Round Diamond Primary	Academy	Primary	60	420	410	10	60	60	59	58	55	59	59
Giles Junior	Community	Junior		360	344	16	0	0	0	90	77	89	88
Giles Nursery and Infants'	Community	Infant	90	270	268	2	89	89	90	0	0	0	0
Leys Primary & Nursery (The)	Community	Primary	60	420	362	58	46	48	60	54	48	59	47
TOTAL			450			150	407	394	436	457	411	459	436

13.54 – states HCC inflates its actual pupil numbers by including Nursery school children in to this total. The above table does not contain nursery places.

13.57 beyond details the secondary education position. The link to the secondary pupil forecasts can be found here:

<https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.hertfordshire.gov.uk%2Fdoc%2Fsch%2Fplanning%2Fsummer-2025-secondary-school-forecast.xlsx&wdOrigin=BROWSELINK>

There were 1307 Year 7 pupils on roll at the 6 secondary schools in the town at Autumn census 2025, against a forecast of 1298. There are 1336 Year 7 places available. The 2025/26 academic year has a lower number of Year 7 pupils than in the 3 previous years and the forecast suggests demand for places at secondary transfer will increase on the current year over the next 4 years. There is currently therefore little spare capacity at the existing secondary schools in the town.

Autumn census 2025

School Name	PAN	School status	7	8	9	10	11
Thomas Alleyne (The)	180	Academy	174	174	176	167	169
Barclay Academy (The)	196	Academy	198	192	205	182	174
Barnwell Business & Enterprise School	240	Foundation	210	241	265	230	253
Nobel (The)	240	Foundation	240	240	238	239	239
Marriotts	240	Community	245	239	240	237	237
The Saint John Henry Newman Catholic School	240	Academy	240	246	243	240	234
TOTAL	1,336		1307	1332	1367	1295	1306

HCC would like to make it known that the application of the data in this document can be somewhat misrepresented. We reiterate that you cannot take the whole school population and use places available percentage to suggest there is sufficient school places locally to mitigate the impact of development. School cohorts operate

in age related year groups. For example a 6 year old cannot take up a spare place in another year group. The County Council has a statutory duty to ensure there are sufficient school places at point of entry (Reception at primary schools and Year 7 at secondary schools) which is when the majority of pupils enter the relevant school phase, whilst also needing to ensure there is in-year capacity to meet any in-year pressures.

Environmental Statement – Cumulative

17.55/17.57 states cumulative pupil yield totals. This section includes estimated numbers of pupils, which have been calculated based on the DfE Pupil Yield Data Dashboard. However, the DfE is clear in its guidance (Estimating pupil yield from housing development - https://assets.publishing.service.gov.uk/media/64d0f71be5491a00134b5940/Estimating_Pupil_Yield_from_Housing_Development.pdf) that use of the DfE pupil yield dashboard is not mandatory. The DfE state that “Where local authorities have robust local evidence of different pupil yields than those shown in DfE’s data, these yields can be used instead of our pupil yield data.” (paragraph 13, Estimating pupil yield from housing development). Furthermore, the DfE considers local evidence of different pupil yields to be robust if it is “transparent, based on a representative sample of housing developments, clearly explained and well-reasoned”. HCC considers that this is the case for its methodology and pupil yield figures and therefore there is robust justification for the position of seeking for a new 1fe of primary education provision on site with proportionate contributions from this development site. Furthermore, the DfE guidance states that “When pupil yield evidence has been tested and validated through a local plan or CIL Charging Schedule examination, planning appeal, or Judicial Review, it should be accepted without further challenge unless there has been a significant material change in circumstances since that time.” It is important to note that HCC has successfully had its methodology tested and validated at appeal (e.g. Buntingford Appeal, APP/J1915/W/24/3340497) so should not have to provide any further evidence on its pupil yield figures and the robustness of the information.

Design & Access Statement – part 4

11.2 The serviced school site will be in phase 1 or any phase HCC requires – this is welcome.

11.16 states that a financial contribution will be made towards education – this is welcome.

The documents provided as part of the planning application submission contain images and maps that depict the school land with buildings on the site. HCC would like these to all be marked indicative or have any footprint of buildings removed from the school land so as to not prejudice the

The CIL Regulations discourage the use of formulae to calculate contributions however, the County Council is not able to adopt a CIL charge itself. Accordingly, in areas where a CIL charge has not been introduced to date, planning obligations in their restricted form are the only route to address the impact of a development. In instances where a development is not large enough to require on site provision but

is large enough to generate an impact on a particular service, an evidenced mechanism is needed to form the basis of any planning obligation sought. HCC views the calculations and figures set out within the Guide to Developer Infrastructure Contributions as an appropriate methodology for the obligations sought in this instance.

The county council methodology provides the certainty of identified contribution figures based on either a known or estimated dwelling mix, the latter of which might be agreed with the local planning authority based on expected types and tenures set out as part of the local plan evidence base. This ensures the contributions are appropriate to the development and thereby meet the third test of Regulation 122 of the Community Infrastructure Levy Regulations 2010 (amended 2019): “fairly and reasonably relates in scale and kind to the development”.

OUTLINE ONLY: Outline applications will require the ability for an applicant to recalculate contributions at the point of a reserved matters application and as such a calculation Table will be provided as part of the S106 drafting process. This approach provides the certainty of identified contribution figures with the flexibility for an applicant/developer to amend the dwelling mix at a later stage and the financial contribution to be calculated accordingly.

Please note that current service information for the local area may change over time and projects to improve capacity may evolve. This may potentially mean a contribution towards other services could be required at the time any application is received in respect of this site.

Justification

The above figures have been calculated using the amounts and approach set out within the Guide to Developer Infrastructure Contributions (Hertfordshire County Council's requirements) document, which was approved by Hertfordshire County Council's Cabinet 12 July 2021 and is available via the following link: [Planning obligations and developer infrastructure contributions | Hertfordshire County Council](#)

In respect of Regulation 122 of the CIL Regulations 2010 (amended 2019), the planning obligations sought from this proposal are:

(i) Necessary to make the development acceptable in planning terms.

Recognition that contributions should be made to mitigate the impact of development are set out in planning related policy documents. The NPPF states “Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations.” Conditions cannot be used cover the payment of financial contributions to mitigate the impact of a development. The NPPG states “No payment of money or other consideration can be positively required when granting planning permission.” The development plan background supports the provision of planning contributions. The provision of community facilities is a matter that is relevant to planning. The contributions sought will ensure that additional needs brought on by the development are met.

(ii) Directly related to the development.

The occupiers of new residential developments will have an additional impact upon local services. The financial contributions sought towards the above services are based on the size, type and tenure of the individual dwellings comprising this development following consultation with the Service providers and will only be used towards services and facilities serving the locality of the proposed development and therefore, for the benefit of the development's occupants.

(iii) Fairly and reasonably related in scale and kind to the development.

The above financial contributions have been calculated according to the size, type and tenure of each individual dwelling comprising the proposed development (based on the person yield).

PLEASE NOTE THE FOLLOWING:

Consult the Hertfordshire Fire and Rescue Service Water Officer directly at water@hertfordshire.gov.uk, who may request the provision of fire hydrants through a planning condition.

I would be grateful if you would keep me informed about the progress of this application so that either instruction for a planning obligation can be given promptly if your authority is minded to grant consent or, in the event of an appeal, information can be submitted in support of the requested financial contributions and provisions. Should you require any further information please contact the Growth & Infrastructure Unit.

Yours faithfully

Xavier Preston
Senior Planning Officer