

Jamie Alderson

From: Jamie Alderson
Sent: 23 July 2026 13:13
To: Matt Kinghan; Velda Wong; Nadine Fisher
Cc: owen.weaver; Claire Westwood; Christopher Martin; Adam Ralton; Liz Fitzgerald
Subject: RE: Croxley Green HCC S106 Education Discussion

Afternoon Matt,

Thank you for your response to the latest information we have provided. It is helpful to understand your client's position regarding the secondary school contributions we have requested. Adam has kindly shared your proof of evidence with us which I believe sets out that justification provided in relation to the CIL compliance of the primary and SEND contributions has been accepted, but it would be great if you could confirm that.

The conclusion reached in relation to secondary school obligation's CIL compliance is not one that we agree with, and we will be preparing a written note setting out our position, which we will share with all parties.

The note originally prepared by Icenj, setting out its assessment of available capacity, considered secondary schools within a three-mile radius of the site and included schools located within both the Rickmansworth and Watford Secondary Planning Areas (SPAs). We demonstrated those schools are currently full, but given the approach taken, we find it somewhat unusual that your principal contention now appears to be that the interrelationship between those SPAs is not fully accepted and that further justification is required regarding the pupil movements that occur between them. In addition, the Education Report prepared by EFM and submitted as part of the planning application acknowledges the movement of pupils from the Watford SPA to schools within the Rickmansworth SPA:

https://www3.threerivers.gov.uk/online-applications/files/5C8A3EC7A53B3B1A72FEFF361631513B/pdf/24_2073_OUT-EDUCATION_REPORT-888020.pdf. Whilst we do not agree with the report's conclusions, it does accept the underlying principle that we have set out regarding cross-boundary pupil movements.

As you will be aware, we are currently preparing pupil movement data as part of work being undertaken on another site. This will provide evidence of the inflows and outflows between the relevant planning areas, and we will share this as part of our evidence for the current scheme. This point alone, in our view, is sufficient to demonstrate there is no capacity in the system that can be relied upon when accounting for existing commitments.

Turning to your second point regarding planned growth in Three Rivers, you will be aware that the Secretary of State has directed the Council to publish a Regulation 19 Local Plan for consultation by the end of July. This will include a number of sites intended to meet approximately 85% of the area's housing need, including your client's site. I suspect your client will rely on that direction in support of the site's in-principle acceptability for residential development. You will appreciate that other sites coming forward on the same basis are making similar arguments regarding their suitability for planning permission. In that context, it is important that we take a pragmatic approach to planning for future infrastructure provision.

In the meantime, we discussed during our last call updating the SoCG following the exchange of information, so that any changes in position can be appropriately recorded. Is that something you would be able to take ownership of?

Many thanks,

Jamie

From: Matt Kinghan <mkinghan@iceniprojects.com>

Sent: 21 July 2026 09:30

To: Velda Wong <velda.wong@hertfordshire.gov.uk>; Nadine Fisher <nfisher@iceniprojects.com>

Cc: owen.weaver <owen.weaver@richborough.co.uk>; Claire Westwood <claire.westwood@threerivers.gov.uk>; Christopher Martin <Christopher.Martin@hertfordshire.gov.uk>; Jamie Alderson <Jamie.Alderson@hertfordshire.gov.uk>

Subject: RE: Croxley Green HCC S106 Education Discussion

Hi Velda

Thank you for your email regarding Croxley Green education S106.

Having considered your response our position for the forthcoming appeal is as follows:

- We agree with your pupil yield model outcomes and pupils arising, 120 secondary; and 25 post 16
- Based on the current known capacity in Rickmansworth secondary area our estimate is that this generates impacts where around half of the secondary pupils push the vacancy under 5% leading to a S106 requirement of c£1.6m, assuming a static (+this development) flow through of current vacancy per yr.
- Whilst you highlight potential future development in Three Rivers, this is not committed or as yet planned, and therefore we don't consider it suitable for this scheme to be mitigating the unknown impact of uncommitted development.
- Further development in Watford sits outside the school place and planning authority area and a quantified interaction has not been provided.
- Our position therefore that the secondary S106 should be £1.6m not £3.6m.
- Regarding post-16, limited information has been provided, but as you note there is surplus at present which based on our review of DfE data is near 40% at Croxley Danes and 27% across the Rickmansworth secondaries on average. Overall we do not see the justification for the c.£756,000

Because of the lateness of information exchange and nearness of the inquiry we are now fixing our position stating the c.£1.6m is appropriate for secondary in terms of the tests of **necessary, direct related and reasonable** with the additional asks not clearly linked to the impacts of this proposed development and other wider commitments.

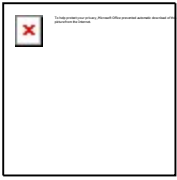
Kind regards

Matt Kinghan BA (Hons) MSc MIED Assoc RTPI
Director, Economics

telephone: 020 3640 8508

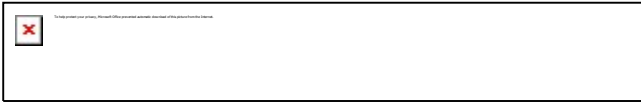
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From: Velda Wong <velda.wong@hertfordshire.gov.uk>

Sent: 16 July 2026 13:04

To: Nadine Fisher <nfisher@iceniprojects.com>

Cc: Matt Kinghan <mkinghan@iceniprojects.com>; owen.weaver <owen.weaver@richborough.co.uk>;

Claire Westwood <claire.westwood@threerivers.gov.uk>; Christopher Martin

<Christopher.Martin@hertfordshire.gov.uk>; Jamie Alderson <Jamie.Alderson@hertfordshire.gov.uk>

Subject: RE: Croxley Green HCC S106 Education Discussion

Hi Nadine,

Thank you for your email. Please find our responses to the queries raised - inserted **in red** beneath the relevant questions in your email dated 8 July.

Further to the discussion in our meeting, I would also like to provide some further information which may assist in clarifying education capacity within the area.

For Primary provision, HCC adjusted the primary contribution cost in our appeal supporting statement to reflect the cost of a new 1FE primary school (with nursery). This is because, from a School Planning perspective, the proposed 1FE primary school is intended to serve the new Little Green Lane development directly, ensuring that the pupil yield generated by the site is accommodated without placing additional pressure on existing schools. This self-sufficient approach supports the strategic objective of delivering infrastructure that is proportionate and responsive to the specific impact of development.

The planning application will generate the need for an additional primary school to be delivered. The Department for Education's Securing Developer Contributions for Education^[1] document is clear, in paragraph 67, that *"urban extensions large enough to require a new school should be expected to meet their full education requirement. Where an onsite school is required, it should be large enough to meet the need generated by the development, based on standard class sizes and forms of entry."*

Given this approach, and the fact that the development would not be considered sustainable without the delivery of the new primary school, HCC's position is that land costs should not be reimbursed and deducted from the total contributions, as suggested in our original calculation.

Accordingly, HCC's requested planning obligation is £6,300,360 (index-linked to BCIS Q1 2024 and BCIS Regional Factor). This represents the standard DfE scorecard cost for a new 1FE primary school with nursery provision, including the 10% sustainability uplift in accordance with DfE guidance.

For Secondary provision, we would like to reiterate our concerns regarding some of the assumptions made within the Education note.

Firstly, we note that sixth form capacities have been included in Table 2.2 in the Education Note. In the current academic year, Croxley Danes school Year 7 – 11 has a capacity of 900, it currently has 895 pupils. Westfield Academy year 7 – 11 has a capacity of 1,200, it currently has 1,173 pupils. This demonstrates that both schools are effectively operating at capacity, and any apparent surplus is largely attributable to sixth form provision. It is therefore not reasonable to assume all arising need would be able to accommodate through capacity within the 6th form year group.

We also do not agree with the analysis presented in Tables 4.1, 4.2 and 4.3 which appears to rely on School Capacity Survey. In our view, the analysis places significant weight on capacity calculations derived from school build size rather than realistic operational capacity, without sufficient consideration of how school places are utilised and managed in practice.

Similarly, we do not agree with the approach taken in Table 5.2 which extrapolates potential decline in pupils beyond the forecast. This does not appear to be a reasonable methodology, as pupil numbers cannot be assumed to continue declining indefinitely, and it is not appropriate to prejudice changes in demand beyond the published forecast period. In so far, overall forecast demand at primary for the relevant Croxley Green PPA shows a tight match between supply and demand.

HCC assesses school capacity within designated school planning areas. Land To North Of Little Green Lane is located within the Rickmansworth Secondary Planning Area. When planning secondary school places, HCC also considers how pupils' movement across the wider Watford area. There are well established pupil movement patterns from the Watford Secondary Planning Area (SPA) into the Rickmansworth SPA. Current data indicates that very limited spare capacity exists across the relevant secondary schools located within these SPA areas. There is significantly less than the surplus the education authority would seek to maintain to provide resilience and flexibility for future demand.

As discussed on our call, it is important to understand how development schemes that have recently been consented are represented in the forecasts. The pupils generated by recent permissions have not yet fully fed through into forecast demand. Only the expected arising demand from housing each forecast year of those children who could be of the relevant entry age are added. Any other arising demand, of which is the majority, would arise beyond the forecast period. As such we must consider this yield as an addition to demand forecast. only those expected to move into schemes. *Furthering this point, within Watford borough, since the adoption of its local plan there have been approximately 3,000 net dwellings completed that will result in yields of between 2-5FE.* Further housing growth is also likely to come forward through the emerging Three Rivers Local Plan (and the Secretary of State's direction to identify additional housing allocations) alongside a number of live planning applications and appeals in the school planning areas.

19 Rickmansworth												
School Code	School Name	Places Available 2025-26	Actuals			Forecast						
			2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32
4007	The Reach Free School	120	151	127	122							
4025	Croxley Danes School	180	182	180	180							
5400	Rickmansworth School	240	270	241	238							
5418	Saint Joan of Arc Catholic School	210	209	216	203							
5421	St Clement Danes School	240	240	240	240							
Total Year 7 Pupil Demand			1,052	1,004	983	962	976	970	920	947	916	908
Total Year 7 Places Available		990				990	990	990	990	990	990	990
Surplus or Shortage of Year 7 Places (No.)						28	14	20	70	43	74	82
Surplus or Shortage of Year 7 Places (%)						2.8%	1.4%	2.0%	7.1%	4.3%	7.5%	8.3%
Surplus or Shortage of Year 7 Places (FE)						0.9	0.5	0.7	2.3	1.4	2.5	2.7

Forecast for the Rickmansworth Secondary planning area for 2025/26.

20 Watford												
School Code	School Name	Places Available 2025-26	Actuals			Forecast						
			2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32
4111	Westfield Academy	240	260	237	236							
5401	Watford Grammar School for Boys	224	224	226	227							
5403	Watford Grammar School for Girls	210	210	211	210							
5404	Parmiter's School	208	224	208	216							
5417	Saint Michael's Catholic High School	180	183	180	182							
6905	Future Academies Watford	210	219	211	157							
Total Year 7 Pupil Demand			1,320	1,273	1,228	1,292	1,288	1,295	1,251	1,232	1,231	1,236
Total Year 7 Places Available		1,272				1,272	1,272	1,272	1,272	1,272	1,272	1,272
Surplus or Shortage of Year 7 Places (No.)						-20	-16	-23	21	40	41	36
Surplus or Shortage of Year 7 Places (%)						-1.6%	-1.3%	-1.8%	1.7%	3.1%	3.2%	2.8%
Surplus or Shortage of Year 7 Places (FE)						-0.7	-0.5	-0.8	0.7	1.3	1.4	1.2

Forecast for the Watford Secondary planning area for 2025/26.

Taking these factors into account, HCC does not consider that existing school capacity, or the capacity currently forecast for the future, will be sufficient to accommodate the additional secondary pupils expected to arise from the proposed development. Consequently, mitigation remains necessary to ensure that the development does not place unacceptable pressure on local education infrastructure.

We hope this provides sufficient clarification regarding HCC's position and the basis for the education contribution requests. We would be pleased to discuss any remaining points, but trust that the information provided assists in supporting the contributions set out within HCC's appeal supporting statement for both primary and secondary provision.

Kind regards,
Velda



Velda Wong
Senior Planning Officer
Growth & Infrastructure Unit | Sustainable Growth
Hertfordshire County Council

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From: Nadine Fisher <nfisher@lcniprjects.com>

Sent: 14 July 2026 16:26

To: Velda Wong <velda.wong@hertfordshire.gov.uk>; Growth <growth@hertfordshire.gov.uk>; Jamie Alderson <jamie.alderon@hertfordshire.gov.uk>

Cc: Matt Kinghan <mkinghan@lcniprjects.com>; owen.weaver <owen.weaver@richborough.co.uk>

Subject: RE: Croxley Green HCC S106 Education Discussion

Dear Jamie and Velda,

I hope you are well.

I am just following up on my email below regarding the pupil yield multipliers and education contribution rates discussed at our recent meeting.

Given the impending appeal, receipt of any further information by close of play Thursday would be invaluable and would help to ensure that the most up-to-date assumptions are reflected in the evidence base.

Many thanks in advance for your assistance.

Kind regards,

Nadine

Nadine Fisher

Senior Consultant, Economics, Strategic Planning

telephone: 020 3640 8508

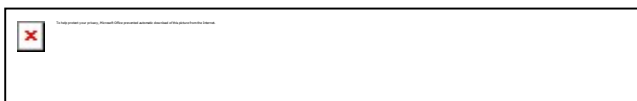
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From: Nadine Fisher
Sent: 08 July 2026 17:47
To: Matt Kinghan <mkinghan@iceniprojects.com>; velda.wong@hertfordshire.gov.uk;
Growth@hertfordshire.gov.uk; owen.weaver <owen.weaver@richborough.co.uk>;
Jamie.Alderson@hertfordshire.gov.uk
Subject: Croxley Green HCC S106 Education Discussion

Dear all,

Thank you for your time today, it was a helpful and productive discussion. We look forward to receiving the additional information from HCC as discussed.

There are two points I'd be grateful for clarification on:

1) Pupil Yield Multipliers

Regarding pupil yield multipliers, I have used the multipliers in Table 6 (page 84) of this 2021 [HCC Pupil Yield Survey](#) for all units to calculate the likely number of pupils resulting from the proposed development. Using this method the number of pupils at each educational stage are presented in the table below.

Total Development	Nursery (N2)	Primary	Secondary	Post-16
600 dwellings	8.4	112.2	72	16.8

Could you confirm that this is the correct methodology to use when calculating pupil yields and if not, please could you provide alternative multipliers?

Hertfordshire County Council uses the Hertfordshire Demographic Model (HDM) to assess pupil yields when assessing pupil yields from development sites that will contribute to strategic education infrastructure that will meet the needs of multiple development sites (as is the case in relation to the additional secondary and SEND places that will be required to mitigate the additional children that will arise from this development proposal). The HDM is based on a local data set of pupil yield that arises from housing schemes that have been completed across the county. The Department for Education's Estimating Pupil Yield from Housing Development^[2] document is clear in paragraph 13 that local authorities are not obligated to use the Department's pupil yield dashboard 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 [the Department's] pupil yield data. In principle, the Department 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. 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." All of the Department's requirements for using our local dataset have been satisfied so it is expected that, per the Department's guidance it should be accepted without challenge. A guide to the HDM has been published online here: [2021 Guide to the Demographic Model](#). Our inputs to, and outputs from the model are included below:

Table 1: Dwelling mix by bed-size, type and tenure proposed for, 24/2073/OUT, Land to North Of Little Green Lane, Croxley Green.

Type	Tenure	Bedsizes	No. Units
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Houses	Open Market and/or Shared Ownership*	1	0
Houses	Open Market and/or Shared Ownership*	2	15
Houses	Open Market and/or Shared Ownership*	3	153
Houses	Open Market and/or Shared Ownership*	≥4	56
Flats	Open Market and/or Shared Ownership*	1	0
Flats	Open Market and/or Shared Ownership*	2	8
Flats	Open Market and/or Shared Ownership*	3	59
Flats	Open Market and/or Shared Ownership*	≥4	8
Houses	Affordable Rent and/or Social Rent**	1	51
Houses	Affordable Rent and/or Social Rent**	2	115
Houses	Affordable Rent and/or Social Rent**	3	0
Houses	Affordable Rent and/or Social Rent**	≥4	0
Flats	Affordable Rent and/or Social Rent**	1	46
Flats	Affordable Rent and/or Social Rent**	2	89
Flats	Affordable Rent and/or Social Rent**	3	0
Flats	Affordable Rent and/or Social Rent**	≥4	0

We anticipate that a development with the characteristics as modelled may yield on average:

- 225 pupils requiring a place in a Primary, including nursery, phase school; and
- 145 pupils requiring a place in a Secondary, including post-16, phase school.

The projected peak average yield for each mainstream phase respectively is shown in Table 1 below.

Table 2: Anticipated mainstream pupil yield (rounded) of, Land to North Of Little Green Lane, Croxley Green as projected by HDM V8.9.6.

Phase	HDM Projected Pupil Yield
Nursery	26 [26.28 before rounding]
Primary	198 [198.23 before rounding]
Secondary	120
Post-16	25

2) Contribution per pupil

The current figures for per pupil education costs are presented in the following table:

Education Phase	Project Type	Scorecard Cost per Place
Nursery	New School	£26,252
Primary	New School	£26,252
Secondary	New School	£31,803
Post-16	New School	£31,803
Nursery	Expansion	£21,988
Primary	Expansion	£21,988

Secondary	Expansion	£30,241
Post-16	Expansion	£30,241
SEND Primary	N/A	£105,006
SEND Secondary	N/A	£127,213

Could you confirm that this data is correct and if not provide us with up to date cost figure?

I can confirm that the per pupil education costs data on the table is correct.

Many thanks
Nadine

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^[1] [Securing developer contributions for education](#)

^[2] [Estimating pupil yield from housing development](#)

* Tenure characteristics like open market dwellings and dwellings provided for sale that offers a route to ownership for those who could not achieve home ownership through the market (or other tenures which display these types of characteristics).

** Tenure characteristics of 100% rented, reflecting needs assessed dwellings for which the rent is set below local market rents (or other tenures which display these types of characteristics).