

Formal Written Representation – Planning and Regulatory Committee (19 November 2025)

Application: P251073/PSI – *Aylestone School, Broadlands Lane, Hereford*

Submitted by: Mr Jeffrey Hancorn, Athelstan Hall, 76 Aylestone Hill, Hereford HR1 1HX

(with supporting evidence from Mr Pdraig Kelly)

1. Overview

We submit this representation in advance of the 19 November 2025 Planning and Regulatory Committee meeting concerning the above application.

Our intention is not to obstruct genuine educational improvement, but to highlight the serious governance, procedural, and evidential flaws that render this proposal unsound.

Herefordshire Council is both **the applicant and the decision-maker**. It is effectively judging its own work under the **Public Service Infrastructure (PSI)** fast-track route — a process intended for genuinely urgent, essential public facilities such as hospitals or emergency services, not for discretionary or delayed local capital projects.

This £13 million scheme has been in gestation for nearly three years since its first Cabinet approval “in principle” in 2023. Officers described it then as the start of a potential *new Aylestone School* that could later extend outward from this very proposed building — by design, further encroaching upon playing-field land. That long-term agenda was never transparently disclosed to the public.

2. Lack of Educational Need

The application’s justification rests on “rising demand” for secondary places in north Hereford.

However, DfE 2025 projections and Council data show **no sustained growth** in pupil numbers:

- Herefordshire’s secondary rolls peak in 2025–26, then decline by around 200–300 pupils by 2030.
- Aylestone’s capacity is 450 places; current enrolment is **419**, meaning it is already **under-capacity**, not over-subscribed.
- DfE figures confirm city-wide declines in secondary numbers and falling eBacc attainment under current leadership.

Expansion therefore risks locking in surplus capacity while rewarding failure.

Without demonstrable long-term need, the claimed public benefit collapses — failing NPPF para 100, Core Strategy SC1, and the sustainability test under SS1.

3. Site-Selection Flaws

Aylestone has been treated as the **default site** since Cabinet’s February 2023 decision, with no evidence of serious alternative assessment.

Public consultations in 2023 and 2025 both framed the expansion as pre-approved, limiting meaningful input on *why this site* was chosen.

The Council should instead consider distributing funding among smaller high-performing schools or alternative partnerships, rather than concentrating £13 million into one repeatedly underperforming site.

This pre-commitment also compounds harm to open space: Aylestone’s constrained playing fields are already below the recommended area per pupil, and building here breaches the NPPF para 104 and Core Strategy OS3 tests requiring surplus or replacement provision.

4. Sport England Objection, Highways & Heritage

Sport England's statutory objection remains unresolved.

They confirm that only the **sports-hall element** could potentially comply under Exception 5; the classroom blocks would remove protected playing-field land, displace an existing two-court MUGA, and create a net loss of sports provision.

That engages the 2021 Consultation Direction — meaning that if the Council is minded to approve despite the objection, it must refer the application to the Secretary of State.

The proposed layout also takes no account of adjacent heritage assets: activity and new planting are pushed toward the open boundary with the Grade II-listed Athelstan Hall, wrongly described as “unaffected.”

The last-minute “internal loop” parking arrangement **entrenches car use**, contradicting the Council's own School Streets and Safer Routes to School policies.

The Highways position now relies on speculative future measures — School Streets pilots, TROs and the internal loop — none of which are permanent, funded or enforceable. Conditional support on that basis is not sound evidence under NPPF paragraph 116.

The public were further misled to believe those separate schemes were part of this application, when in fact they are not.

Meanwhile the school itself complains that it already has **17 acres to manage** — an admission of poor site management even before any new, potentially commercial, structure is added.

Since objections were lodged, intensified activity has appeared directly beside our property — including rugby training and goalposts newly sited against our boundary.

This intensified use has emerged only as a **new phenomenon during the course of this application**, coinciding with residents' formal objections.

5. Amenity, Transparency, and Community Use

The project's **commercial intent** only became clear late in the process through answers to MP enquiries — **nor was its intended commercial purpose ever disclosed openly**.

Such extended hire and community-use hours constitute a **material change of use** of playing-field land, requiring separate Secretary of State approval, as with the withdrawn 2018 3G proposal.

This concealment persisted throughout limited consultations, producing low attendance and misunderstanding, compounded by an application title that omits any reference to the sports-hall element.

Goalposts and equipment are now routinely left strewn across the site's **north-western corner**, directly adjoining Athelstan Hall — behaviour symptomatic of poor management under the same leadership.

Publicity for unrelated road schemes was also used to imply wider outreach, misleading participants about the scope of the current proposal.

6. Governance, Procedural and Consultation Failures

The PSI fast-track route is reserved for **urgent educational or health infrastructure**, yet no proven educational urgency exists.

Herefordshire Council is both the **applicant and principal funder**, not the Department for Education — a clear conflict of interest.

The **Monitoring Officer's October 2025 letter**, restricting resident contact to a director directly involved in the PSI scheme, typifies the defensive governance culture surrounding this project.

Significant consultee material — including Balfour Beatty's 5 June and 26 September representations requiring written evidence that drainage can lawfully pass via third-party land to reach the adopted network — appeared on the portal only within the past week, **after closure of consultation**.

No approvals from **Welsh Water or affected landowners** are provided.

Meanwhile, the **Hereford City Council** representation remains unreadable despite requests for correction.

These late and incomplete disclosures render the consultation process defective and inconsistent with DMPO 2015 obligations.

7. Conclusion

This application fails on process, policy, and public accountability.

It lacks proven educational need, destroys protected playing-field land, and proceeds under a PSI designation that is neither appropriate nor lawful.

The combination of unresolved statutory objections, weak consultation, governance conflicts, and poor site management demands that this Committee **refuse or defer** the application pending:

- A verified educational-need assessment;
- A Sport England-compliant design;
- Transparent governance independent of conflicted officers.

If the Committee is nevertheless minded to approve, it must first **refer the decision to the Secretary of State** under the 2021 Consultation Direction.

Respectfully submitted,

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(with supporting evidence from Mr Pdraig Kelly)

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Date: 12 November 2025