

EXAMINATION OF WHBC LOCAL PLAN 2016 -2036

Regulation 19

Little Heath Action Group

Statement on

Stage 9 Hearing Sessions: EX206A HCC Supplementary Education
Statement - Little Heath Sites HS24 & HS25.

11th February 2021

Documents supplied with this statement:

For reference to in the Hearing

HCC Primary School Allocations 2020-21 (Highlighted)
HCC Summer 20-21 Primary School Forecast
Chancellors Consultation Letter - November 2017

To confirm statistics quoted in this statement.

HCC Primary School Allocations 2019-20
HCC Primary School Allocations 2018-19
HCC Primary School Allocations 2017-18

Introduction

During the Stage 8 Hearing Sessions Hertfordshire County Council (HCC) held the view there were sufficient available Primary School Places in Little Heath School and the wider Potters Bar area to accommodate the proposed additional development in Little Heath. HCC claimed that the school was full due to applications from pupils' father away or outside of the area.

Little Heath Action Group (LHAG) took an entirely different view; that Little Heath School and the Potter Bar PPA were already full/nearly at capacity from local children.

On request of the Inspector, HCC were asked to provide a briefing note to demonstrate their view was substantiated and to provide information on the 2021 entry. **EX206A**

This representation aims to clarify exactly our view on the Stage 8 Hearing discussion and the HCC briefing note. We have provided supporting documents to support our claim, referred to page numbers and highlighted text where possible to allow for quick reference.

Little Heath Primary School Admissions

Little Heath School is its own Admissions Authority, and the following information has been provided direct by the school. Please note the Furthest Child Admitted column to the far right.

	Applications	Allocations	Siblings	Distance	Furthest Child Admitted
2020	154	30	12	18	961.75m
2019	164	30	15	14	443.97m
2018	159	30	15	15	934.61m

In addition, the school adds *"Half our pupils are admitted based on the sibling rules and we admit the rest on distance. We occasionally have people move home through the school year but that is infrequent and can't be added to any forecasts. There is no additional capacity at the school in any year. None of these numbers include the continuing interest applications"*.

Only 1 pupil, from outside of the county was allocated a Potters Bar Primary school place in 2020. In 2019, 2 obtained a place in Potters Bar, in 2018 no children from outside the county were allocated a place in Potters Bar. *HCC Application and Allocation Statistics 2020/2021 (pages 78-83)*

Considering, in the last 3 years, the furthest child allocated a place lives just 961m away with just 3 out of county allocations - the notion the pressure for Little Heath Primary places is due to the admission out of area applicants is simply incorrect and entirely unsubstantiated by HCC.

Proposed Development in Little Heath

HS24 (BrP7), as measured by the school's distance measuring tool, is 630 metres from Little Heath School. EX232 Statement of Common Ground between WHBC and the RVC shows the proposed site would extend a further 200m. So proposed new dwellings would be circa 630m - 830m from the school.

Considering the furthest child admitted to LH School in three years lived just 961m away it would be questionable how many children from this new development would get in in future years. A repeat of 2019 would mean no children would be accepted and would be forced elsewhere. The school have already conceded there are no in-year spaces so up to 48 in year students could be pushed elsewhere.

LHAG accepts that some children may get in from this site and from other potential sites in Little Heath that are slightly closer. But no matter how many children do succeed, it will only add pressure to the already at capacity Potters Bar School Planning Area. The following pages will demonstrate this.

HCC Forecasting

The following quote and table are taken from HCC's EX206A. - "This clearly shows that there is currently a surplus of reception places across the schools within the Potters Bar PPA and that this surplus capacity is forecast to continue for the next four years."

Quite how HCC can deduce the above from the chart is perplexing.

- Currently there is not a surplus across all of the schools, there is only a surplus at one school; Oakmere Primary.
- HCC have not provided forecast information on a school-by-school basis so the claim there is availability across schools will continue is unsubstantiated and given the historical numbers seems quite unlikely.
- Further, we are well into the 2020-21 school year, so this column has not been updated. So, in reality this is only a 3-year forecast.

15.2 Potters Bar									
School Code	School Name	Places Available 2020-21	Actuals			Forecast			
			2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
2980	Cranborne Primary School	60	59	60	60				
2982	Ladbrooke Junior Mixed and Infant School	30	30	30	30				
2985	Oakmere Primary School	60	42	48	39				
3975	Pope Paul Catholic Primary School	30	30	30	30				
5204	St Giles' CofE Primary School	15	15	15	15				
5206	The Wroxham School	30	30	31	30				
5207	Little Heath Primary School	30	30	28	30				
Total Year R Pupil Demand			236	242	234	215	209	213	201
Total Year R Places Available		255				255	255	255	255
Surplus or Shortage of Year R Places (No.)						40	46	42	54
Surplus or Shortage of Year R Places (%)						15.7%	18.0%	16.5%	21.2%
Surplus or Shortage of Year R Places (FE)						1.3	1.5	1.4	1.8

As an aside, HCC is in breach of Department of Education guidance. **Department for Education – Schools Capacity – Guide for Local Authorities (June 2019)** clearly states that "Primary forecasts must extend five years ahead" This Table only gives 3 years forecast.

It would be entirely reasonable for HCC to have proper 5-year forecast for the benefit of the Local Plan. Given the special request by the Inspector for additional information it seems incredulous that HCC would simply not bother updating this.

IF HCC were truly acting diligently, they could carry out some further work on a longer range forecast not just refer to data on 0-4 year olds registered with doctors surgeries.

The issue of how dramatically the forecast has changed in such a short period of time also needs to be raised. The below table was the forecast as of May 2019.

15.2 Potters Bar		No of places available 2018-19	Actuals			Forecast			
School Code	School Name		2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
2980	Cranborne Primary School	60	61	59	59				
2982	Ladbroke Junior Mixed and Infant School	30	28	30	30				
2985	Oakmere Primary School	60	37	31	42				
3975	Pope Paul Catholic Primary School	30	27	25	30				
5204	St Giles' CofE Primary School	15	16	12	15				
5206	The Wroxham School	30	30	30	30				
5207	Little Heath Primary School	30	30	30	30				
Total Year R Pupil Demand			229	217	236	241	267	252	246
Total Year R Places Available		255				255	255	255	255
Surplus or Shortage of Year R Places (No.)						14	-12	3	9
Surplus or Shortage of Year R Places (%)						5.5%	-4.7%	1.2%	3.5%
Surplus or Shortage of Year R Places (FE)						0.5	-0.4	0.1	0.3

There seems to be a 40+ swing in the number of available places. It is hard to see how, in just 15 months between forecasts, numbers can change so significantly. Either the current forecast is out by some margin or this one was? I am unsure of how much confidence can be held in these two forecasts.

In the first round of hearings, you may recall LHAG questioned HCC plans on school places. HCC made a statement to the hearing to the effect that – they had never not built the required school places before. The Hearing took the view that this would have to be taken on face value.

LHAG believes, due to poor forecasting, failings that have come to light since that discussion with respect to secondary provision which now make that claim invalid. Detail of this may be found at the end of this response as an Addendum.

HCC Application and Allocation Statistics 2020/2021 (HCCAAS 2020) – Published 16 April 2020 (Included in the submission, as well as the previous 3 editions)

The forecast data is only one side of the equation; it would be reasonable to also look at further ACTUAL data. The HCC document of the above title published every year on school Allocation Day. It goes into significant detail on where applications are made from and how many children are allocated places.

Potters Bar Primary Planning Area (PA) has 255 school reception entry places every year. The figures following show Applications and Allocations for 2020 and 2017-2019.

Applications by Parish or Town of Applicant (HCCAAS 2020 Pages 5-10)

In 2020, there were 234 applications from children living in Hertsmere side of Potters Bar. (Page 8) This figure does not include applications from Little Heath or Potters Bar children in Welwyn Hatfield. (In previous years 2019-241, 2018- 239 and in 2017-246 for 255 School Places)

Including Little Heath School places but not including Welwyn Hatfield residents in the numbers creates an anomaly. By way of trying to provide a like for like comparison the issue could be looked at as follows:

- 234 Applicants for 225 School places - if Little Heath School capacity (30) were taken out of the available school place numbers.
- 264 Applicants for 255 School Places - if the circa 500 dwellings on the Welwyn Hatfield side of Little Heath were added (in planning terms) this would equate to an extra 1FE / 30 places

Since Little Heath straddles Potters Bar (Hertsmere) and North Mymms (Welwyn Hatfield) and the document shows exact figures for these two areas we could instead show combined figures:

- 92 applications from applicants residing in North Mymms (Page 10)
- 75 additional school places in North Mymms - Brookmans Park (45) and St Marys (30)
- 326 total applications from pupils within Potters Bar & North Mymms.
- 330 total School places within Potters Bar and North Mymms.
- (Previous years combined applications 2019 - 328 / 2018 - 323 / 2017 – 339 for 330 places)

Further afield the Essendon school shows a shortfall of available places for the next two years and Hatfield is at capacity. (Aside from the St Marys figures which are already included above) (HCC Summer 20-21 primary school forecast Excel Worksheet – Attached to submission)

By any “like for like” measure over the last 4 years, when the number of children that live within an area are compared with available school places in the same area places are extremely limited.

Allocations by Parish Town of Applicant (HCCAAS2020 Pages 11-17)

Allocation of Potters Bar Hertsmere pupils 234 (Page 14) and North Mymms Pupils 92 (Page16) reflect the same as above. 326 combined allocations for 330 School Places; both within the area. (Combined allocations for previous years 2019-328 / 2018-323 / 2017-335)

Allocations by School / Potters Bar Primary PA (HCCAAS2020 Pages 20 – 45)

It should be noted, as well as Little Heath, many schools in Potters Bar are oversubscribed; Cranbourne 200+ applications per year for 60 places, Ladbroke 150+ applications for 60 places, Pope Paul 85+ for 30 places, Wroxham 138+ for 30 places.

In the majority of cases, aside from special cases and siblings, highly competitive “closest to the school” admittance rules are applied.

When the allocations of the 7 schools of the Potters Bar PPA, including Little Heath, are added together there were 251 allocations for 255 school places. Previous years (2019-252 / 2018-268 / 2017-259)

It seems in 2020-21 (and in 2019-20) nearly all schools in Potters Bar were allocated their maximum number of places and historically remain full at that number. In 2017 and 2018 PB schools were over allocated; 268 and 259 children respectively.

Non-Ranked Allocations (NRAs) County Rankings (HCCAAS2020 Pages 11 -17)

On average 97.53% of children in Hertfordshire obtain a ranked place. The right-hand column of these pages measures the percentage of pupils that received a place at one of their ranked schools on their application.

Children that are not allocated a place at one of their chosen/ranked choice schools are assigned a school by the county where there is space – these are called Non-Ranked Allocations. Potters Bar has one of the highest rates of NRAs and this can be demonstrated when compared to the rest of the county.

2020-21 - 19 Children were NOT allocated a ranked Primary Place.

Only 92.31% of Potters Bar children were allocated a ranked primary place. This puts Potters Bar 126th out of 131 Hertfordshire Parishes/Towns. (Page 14)

2019-20 - 32 Children were NOT allocated a ranked Primary Place. Only 86.72% of Potters Bar Children were allocated a ranked place. 129th out of 131 Parishes/Towns.

North Mymms (Brookmans Park & Welham Green) came 121st out of 131 Hertfordshire Towns/Parishes. (Page 16) The previous year North Mymms were in 118th place out of 131.

Hertsmere had the worst ranked allocation out of all 10 HCC boroughs only achieving 95% compared to the Hertfordshire average of 97.5% (Page 14) In the previous year Welwyn Hatfield had the worst allocations figures with Hertsmere coming second last.

This conundrum starts to make sense when the NRAs above are linked to the HCC Forecast Table. It seems all the above NRAs end up being allocated to Oakmere Primary School, the only school in the Potters Bar PPA with any capacity.

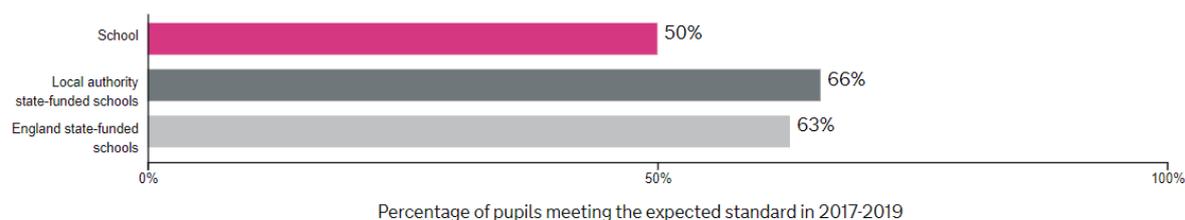
Oakmere Primary School

In 2020 Oakmere was assigned 19 NRAs (HCCAAS2020 Page 33) (Previous years 33/ 27 / 35)

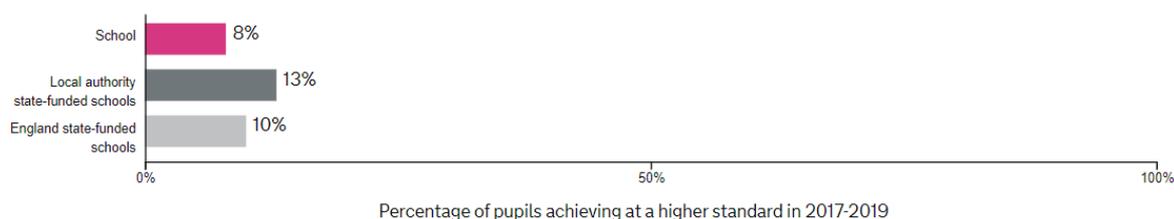
It is worth noting this is the highest number of NRAs put into one school in the whole of Hertfordshire County for 4 years running.

Unfortunately, when compared to other schools within the local authority (and throughout England) their performance is not comparable and thus not as desirable. The following summary charts are from Gov.UK web site:

Pupils meeting expected standard in reading, writing and maths – 3 Year Average.



Pupils achieving at a higher standard in reading, writing and maths – 3 Year Average



It seems the children assigned to Oakmere Primary do not take up their “take it or leave it choice” for a Potters Bar school and decide to go elsewhere.

In document EX206 HCC Supplementary Education Statement Brookmans Park HCC highlights the following: *“Furthermore, it is not unreasonable for there to be a level of flexibility with the overall number of school places to allow for fluctuations in local demand and parental preference...”*

In Summary

A direct link can be made in the number of NRAs sent to Oakmere School and the reduction in “actual” figures in HCC forecast table. It is the only school which consistently has capacity. Forcing no choice on 19, 33, 27 or 35 children for the last 4 years is not in the spirit of the HCC statement with respect to parental preference.

It quite legitimately could be claimed, in the absence of any other proper substantiated data from HCC, their forecast is based on the drop off from Oakmere Primary School.

We have demonstrated comprehensively that there are around the same number of pupil applications and allocations as there are school places for any given area which adds pressure on the school system and leaves little choice for parents.

We have demonstrated comprehensively that Little Heath school is not full because of pupils coming from outside of the area.

Adding any dwellings to Little Heath or Potters Bar will be in breach of NPPF 2012 guidance unless some school expansion can be facilitated.

NPPF 2012 Paragraph 72 states *“The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*

- *give great weight to the need to create, expand or alter schools; and*
- *work with schools promoters to identify and resolve key planning issues before applications are submitted.”*

The DtC statement between WHBC HCC and Gascoyne Cecil Estates has reached outcomes for school provision; a site has been identified; the size of the school has been agreed as well as a time frame. YET the Current DtC MoU between WHBC and Hertsmere BC – May 2017 – does none of this.

Point 5.24 of the DtC highlights; *WHBC is proposing to carry out an early review of the Local Plan in order to identify both secondary and primary school capacity.* This should have been completed before submission of the Local Plan. As far as we are aware no recent MoU or document has been published between WHBC and HCC on the matter of schools' place provision.

In 2016, HBCs response to WHBC Local Plan consultation asked "*We require that further evidence is sought and provided to support the assertion that the likely need for school places created by these developments could be delivered through existing capacity...*" To date this had not been answered.

WHBC are in contravention of Section 33A of the Planning and Compulsory Purchase Act 2004 which states that local planning authorities are "*to engage constructively, actively and on an ongoing basis in any process*". We are unable to see how WHBC, HBC and HCC have engaged properly on this matter, why have WHBC not questioned the out of date forecast information for HCC?

The Inspector gave HCC the opportunity to share any material facts to support their claim – yet HCC have decided to show out of date information and share unsubstantiated claims. HCC declined the opportunity to update its Summer 2020 Forecast even for the purposes of this inspection.

Therefore, we feel in its current form the WHBC Local Plan with respect to planned development in Little Heath and Potters Bar is UN-sound.

- **Not Positively Prepared since the plan does NOT have a strategy which seeks to meet all infrastructure requirements.**
- **Failure to meet DtC requirements.**
- **In contravention of the Planning & Compulsory Purchases Act 2004**
- **Not Consistent with National Planning Policy NPPF 2012**
- **The displacement of school children is not sustainable.**

Simon Polledri
LHAG

Addendum

Statutory Requirement for the Provision of School Places.

In 2017 48 children in Hatfield could not be allocated a secondary school place at all. They were all forced to go on continued interest lists. A letter (attached to this representation) from Chancellors School dated 20th November 2017 explains how HCC tried to play catch up.

HCC had not provided a school place for those that want one.

At the start of 2019 Chancellors were forced to use temporary classrooms as an interim measure.

Chancellor School adds expansion is necessary because the site is already “deficient in teaching spaces for the current pupil numbers”, the current classrooms are too small with "overcrowding prevalent" which is “placing considerable strain on the already limited and undersized facilities”. Chancellors Dining hall is too small to cope with the increase in children. Some children are required to eat their lunch outside or in classrooms due to the lack of space.

It should be noted that Chancellors School, Brookmans Park in the Potters Bar PPA; quite correctly HCC has followed statutory guidance that Planning Areas (PA) are groups of schools that reflect patterns of provision.

Quite why HCC, having not forecast or provided the correct number of secondary school places in Hatfield, forced additional pressure on a school in a neighbouring PA is puzzling. This creates additional car journeys which is unsustainable, less choice for Potters Bar PA children but most importantly the cramped facilities mean the children are worse off.

This is not the approach a diligent authority, actively trying to provide the right number of school places takes. We do not accept HCC forecasting methods or provision of school places complies with statutory guidance.