

St Albans District Council  
Civic Centre  
St Peter's St  
St Albans  
AL1 3JE

FAO Planning

Your Reference: 5/2017/2733

Date: 27 October 2017

Planning Application Ref: PL/0866/17 (Hertfordshire County Council) / 5/2017/2733 (St Albans District Council – Proposed Secondary School)

Dear Sirs

We are a residents group formed in 2013 following an announcement by Hertfordshire County Council of its intent to acquire land in Batford, Harpenden for the purpose of establishing a new secondary school. Our members are overwhelmingly residents in the District and are largely based in Harpenden East, Wheathampstead or Harpenden North Wards.

We recognise the role of St Albans City and District Council is that of a Consultee in the matter of this application and have focused the detail of our comments on matters that we believe relate to District considerations. It is our intention to make a more substantial representation directly to application process, although we would ask you to note that the sheer volume of information is, in our view, beyond that which it is reasonable to expect lay readers to assimilate. We ask you to note that at time of writing we have raised numerous omissions in the evidence presented in support of the application and that to date none of these have been addressed by the Planning Authority.

We are aware that the requirements for Very Special Circumstances apply to this application, which, if granted, we understand will require removal of land from Green Belt. The requirements of VSC are quite onerous and we are aware that the whole reason for the site being identified and an application being brought forward is driven by an assessment of Need (for school places). Such assessments are provided by Hertfordshire County Council and only by HCC – there is no independent source such as DfE. HCC has declared over years of submissions in support of school expansions and for consideration of Local Plans that its principal source of information is Forecasts produced by Schools Planning, usually produced in early Summer each year and updated in Autumn. These are published on HCC website and have until recently the current version has been 'Summer 16-17 Forecast', however a new version has been added late this week. This forecast also appears to have

the same file title as previous version, but on opening shows 2017-18 interim. The forecasts can be accessed at [www.hertfordshire.gov.uk/services/schools-and-education/at-school/school-planning/school-planning.aspx#DynamicJumpMenuManager\\_1\\_Anchor\\_2](http://www.hertfordshire.gov.uk/services/schools-and-education/at-school/school-planning/school-planning.aspx#DynamicJumpMenuManager_1_Anchor_2). The 'current version' that had been displayed for over 12 months and was originally expected to be published in June/July 2016, it was live at the time of HCC's presentation to SADC's PPC in September 2016. The new version, declared (at 27 October) as Summer 16-17 forecast contains different information from previous publications by HCC. The general practice for these forecasts (at Secondary level) is to produce 11 years forward information, albeit that the initial year is often issued after all applications have been processed. The previous forecast followed this format – the interim forecast, noted today, has only 4 years forward data for most of the County – the exception being Harpenden Planning Area for which 10, rather than 11 standard, years are shown. The accompanying 'Meeting the Rising Demand' reports – published on the same page of HCC website – currently (at 27 Oct) retain the 2016/17 Summer planning data – these outline HCC plans and recent changes.

The forecasts are produced in areas, which are different to Priority areas that are used to guide the allocations process. In this instance the Schools Planning area is HCC reference 11, which is centred on Harpenden; the priority area for residents is larger and is based on St Albans District, and includes the 'St Albans' Planning Area, which effectively is the Southern half of the District. There are therefore three sets of current figures relating to the Planning Application that are in circulation – the Rising Demand forecast – as published at time of submission of Application to HCC; the Interim forecast – as published on or about 27 October and severely curtailed from standard practice and the figures that are published in the Application. These are shown in Appendix 1 to enable comparison – the figures submitted in support of the Application are contained within section 3 of the Education Need Assessment provided as a support document.

There are wild variations in the forecast information provided. Overall HCC have previously claimed figures are accurate to 1%. In practice HCC have declared that they have had to amend the forecasts for the Application – the reasoning is outlined in sections 3.5-3.11. HCC (as co-Applicant) has departed from its established practice as noted in sections 3.9, 3.10 which state "It is therefore necessary to consider the level of demand which would have been shown, if different trend data had been used in the calculation." The evidence submitted then states that HCC has adjusted its forecast for the purposes of this planning application.

There is no supporting evidence for the scale of the adjustment proposed by HCC. In essence what appears to be an unspecified number of pupils have been added to this forecast. This represents a departure from accepted practice and separately we can find no evidence of approval – through the applicant's established processes of Cabinet Panels – of a change in modelling method. Early analysis of the newly released data suggests this is no more than a crude percentage (we deduce 8.69%) added to the forecast model run for 2017/18 in HCC's standard manner – the derivation of the figure is not given.

In section 3.7 of the Needs Assessment HCC identify a move of pupils from Harpenden to St Albans as a major contributory factor to change of dynamic. In practice there is an underlying factor for children who attend particular types of school – single sex, particular Faith etc – which are only available in St Albans and serve the whole Priority Area, including Harpenden, e.g. St Albans Girls School, and the regular demand for such places is not differentiated. It is known that short term places were provided at Sandringham School for the past three years – 25 places were offered in 2015 & 2016 and 55 places were offered in 2017 – however these were initially offered to Wheathampstead resident pupils in the first two years and in 2017 40 were ring fenced for Wheathampstead, 15 for Harpenden – of

these 31 were taken up by Wheathampstead and 4 from Harpenden. (see Appendix 2 for extract from HCC published Allocations data – after Continuing Interest Round 2 2017-18 entry).

This highlights another issue – how much of Harpenden is in Harpenden Town? In practice HCC's Planning Area includes two out of District areas – Hemel Rural North (Dacorum) and The Waldens (North Herts). HCC directs pupils from these areas towards Harpenden for schooling. In the course PPC meetings for the formulation of the Local Plan, RSRP brought to the Council's attention that HCC figures indicate over 700 pupils from these areas are directed towards its Harpenden Schools Planning area, i.e. that more than half a school comes from out of District – a point that SADC stated (in PPC) that it was aware of, but not aware of the scale of. The Wheathampstead allocations to Sandringham were instituted because Villages outside Harpenden Town were suffering much poorer admission rates to Harpenden schools than was the case – 80% getting a preferred (ranked) choice (one of four) compared to over 95% in Harpenden Town. In practice Kimpton and villages further North were getting lower success rates than Wheathampstead pupils.

It is our contention that the allocation rules applied by schools adopting HCC's standard lead to disadvantageous outcomes for pupils at distance from a school. In the Harpenden planning area nearly 40% of pupils are resident outside the Town, either in Villages in St Albans District or in villages in adjoining districts / Boroughs. The larger share of these are in the two main villages in the North of the district – Redbourn and Wheathampstead.

We therefore ask 'what is the purpose of the forecast system?' – it is to accurately predict where demand will come from so that resources can be planned to match. Each year HCC produces summary statistics of the ACTUAL applications it received for Primary and Secondary school entry. Appendix 3 shows extracts for the St Albans District as presented by HCC for 2017 entry. What can be seen is that Harpenden Town accounts for around 400-450 pupils - a figure that includes (at secondary) applicants who choose to go to school outside Harpenden's three current schools. In practice our analysis of HCC data shows that there has been a drift up from around 360-380 pupils to around 420-430 in the Town, and there is a short term peak where numbers rose higher. HCC's statistics drawn up for its work by Vincent & Gorbng in 2014/15, analysis of which was submitted by RSRP to PPC between July and October 2016, identified that a 'greater Harpenden' figure peaked at just under 500 resident pupils based on a forecast demand of 820 in peak year – a figure that subsequently reduced to 749 in the last full forecast, of which Harpenden Town's share is approx. 450 (peak). The plans for the school envisage lifting Harpenden based secondary capacity to 750 – essentially meaning 300 pupils per year will be required to travel in to the Town. Over 7 years of schooling this equates to a net inward movement of 1,700 pupils per day.

There are two key issues with this – large numbers of pupils drawn onto very specific traffic corridors when there are more sustainable alternatives if alternative sites are considered; Secondly any change in demand – upward to squeeze places and downwards to threaten removal of what would become excess capacity - will see a return to the disadvantage experienced by distant pupils who will continue to be last in the queue for places due to the distance rules in the allocation system. Due to the physical locations of schools in Harpenden the effects of remoteness are experienced more by pupils to the East than to the West, though both have issues obtaining places.

Under HCC's broad brush approach Wheathampstead was quickly eliminated from consideration for a school, despite, like Redbourn, having been the site of a previous school. Its pupils and those beyond it in Kimpton and Whitwell have suffered repeated bouts of poor

admission success depending on both local demand and on influx of pupils from Out of area when excess places had been available (such pupils can generate Sibling rights which have preference in later years and can lead to displacement of local pupils). SADC is charged with maintaining and promoting the interests of all its residents and those who are dependent upon it under neighbouring practice. It is committed in its policies to providing equality of access – the establishment of a school in close proximity to other schools, all operating similar distance based selection criteria will inevitably perpetuate disadvantage. To meet VSC conditions all reasonable options must have been considered. It is our contention that they have not, they have been artificially excluded by HCC's methodology.

When looking at how HCC has presented supporting information it is clear that it has not analysed its demand and the impact of its proposal to the detriment of large groups of SADC citizens and their children and those of neighbouring Boroughs who are reliant in them. Further analysis of PPC and related matters will show significant unanswered questions about information HCC presented to the Council in September 2016 in support of its claim to have the site added to the DLP – including further deviation from its accepted forecasting practice – this was last reported to PPC in July 2017, when after many years there is still no answer from HCC on the local nature of demand and how this is accounted for.

The question of locality of demand and its impact on Planning / Forecasting has been previously considered by HCC. A county-wide issue has been identified and acknowledged on the basis of a review of Harpenden Education Planning Area undertaken following difficulties. The "Secondary School Place Planning Topic Group" in HCC reviewed the matter from April to September 2006, reporting to HCC's Childrens Schools and Families Scrutiny committee of 11 October 2006. Recommendation 3 within section 5 of the Scrutiny final report called for more granular planning – to parish level - due, amongst other reasons, to risk of error and misrepresentation arising from higher level forecasting in 'hotspot' locations. The recommendations were fully accepted by HCC, changes promised, and indeed lack of progress highlighted in subsequent meetings, but no visible change occurred in the modelling of forecasts either in quieter times or in specific occasions where in effect the findings deemed such change essential. In essence there were reasons why this level of planning was identified and accepted by HCC a number of years ago, but there has been a failure to implement and the current circumstances represent the greatest risk of error and long term irreparable damage through ill-informed decision making that can arise in such circumstances. RSRP has effectively campaigned through public questions to PPC for SADC to demand the level of information identified, but not delivered, by HCC over the past four years as it believes SADC deserves appropriate evidence on which to base a decision which RSRP expects would be wholly different in nature and have greater beneficial outcome for its residents with the benefit of the correct evidence.

It follows that if the school progresses in the wrong place the consequences identified by many other objectors will follow – be this loss of Green, Visual impacts, loss of farming (which has already occurred in part) and very significant traffic issues of both safety and amenity. As VSC requires the root case to be properly prepared and alternatively fully evaluated we ask that SADC insist on this for the greater benefit of its residents in the long term. To do so requires rejection of this application as it stands.

David Cairns

Chairman RSRP (Right School Right Place)

For purposes of local identification my home address (within the District) is 37 Common Lane, Harpenden, Herts AL5 5BT

## Appendix 1: Forecast Data from HCC (three versions)

Version 1 – Summer 2016-17 forecast as current Summer 2016 to late Oct 17 and referenced in Rising Demand report.

2016/17 SUMMER FORECAST - SECONDARY

11	HARPENDEN		ACTUALS			FORECAST									
NO	SCHOOL	School admissions 2016	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
480	St George's	180	182	184											
481	Sir John Lawes	196	201	200											
482	Roundwood Park	196	199	201											
	Number of Year 7 places available	572	582	585	572	572	572	572	572	572	572	572	572	572	572
	Demand				588	636	674	749	710	719	740	699	668	612	576
	Surplus/Shortage				-16	-64	-102	-177	-138	-147	-168	-127	-96	-40	-4
	% Surplus/Shortage				-2.8%	-11.2%	-17.8%	-30.9%	-24.1%	-25.7%	-29.4%	-22.2%	-16.8%	-7.0%	-0.7%
	No of FE				-0.5	-2.1	-3.4	-5.9	-4.6	-4.9	-5.6	-4.2	-3.2	-1.3	-0.1

Version 2 – Published circa 27 Oct 2017

2017/18 SUMMER INTERIM FORECAST - SECONDARY

11	HARPENDEN Total		2017/18 SUMMER INTERIM FORECAST - Secondary SCHOOLS 17-08-2017												
School No	SCHOOL	SCHOOL ADMISSIONS 2017	2015/16 ACTUAL	2016/17 ACTUAL	2017/18 FORECAST	2018/19 FORECAST	2019/20 FORECAST	2020/21 FORECAST	2021/22 FORECAST	2022/23 FORECAST	2023/24 FORECAST	2024/25 FORECAST	2025/26 FORECAST	2026/2027 FORECAST	
480	St George's	180	184	182											
481	Sir John Lawes	196	200	202											
482	Roundwood Park	196	201	196											
	Actual Number on Roll		585	580											
	Number of Year 7 Places Available	572			572	572	572	572	572	572	572	572	572	572	
	Demand				603	647	698	672	672	711	665	659	616	588	
	Surplus/Shortage				-31	-75	-126	-100	-100	-139	-93	-87	-44	-16	
	% Surplus/Shortage				-5.4%	-13.1%	-22.0%	-17.5%	-17.5%	-24.3%	-16.3%	-15.2%	-7.7%	-2.8%	
	No of FE				-1.0	-2.5	-4.2	-3.3	-3.3	-4.6	-3.1	-2.9	-1.5	-0.5	

Version 3 – Data submitted in Needs Assessment in Planning Application

- 3.10 As a consequence, actual demand for Harpenden places is higher than more recent forecasts indicate. It is therefore necessary to consider the level of demand which would have been shown, if different trend data had been used in the calculation. Modelling forecast demand to allow for a more representative percentage of Harpenden children seeking places within the EPA would indicate the following level of demand:

HARPENDEN	PANs 2017	FORECAST									
		2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
Year 7 places available	572	572	572	572	572	572	572	572	572	572	572
Demand (Model)		703	759	730	730	773	723	716	670	639	679
Surplus/Shortage		-131	-187	-158	-158	-201	-151	-144	-98	-67	-107
% Surplus/Shortage		-23.0%	-32.6%	-27.7%	-27.7%	-35.1%	-26.4%	-25.2%	-17.1%	-11.7%	-18.8%
No of FE		-4.4	-6.2	-5.3	-5.3	-6.7	-5.0	-4.8	-3.3	-2.2	-3.6

- 3.11 The model above shows a deficit of approximately 5.6FE across the next five years, with peak deficits greater than 6FE in 2019/20 and 2022/23.

Appendix 2: Uptake by 'Harpenden' at Sandringham School

Link: [www.hertfordshire.gov.uk/services/schools-and-education/school-admissions/research-a-school/school-admissions-previous-years-statistics.aspx](http://www.hertfordshire.gov.uk/services/schools-and-education/school-admissions/research-a-school/school-admissions-previous-years-statistics.aspx) - 2017-18 Secondary Admissions Statistics



HERTFORDSHIRE COUNTY COUNCIL - CHILDREN'S SERVICES

Secondary/Upper/Yr 10 Transfer

School Allocation Summary Report - Continuing Interest 2 - 27/04/2017

<b>Sandringham School</b>		<b>Total Applications: 1342</b>
PAN: 240		<b>Total Allocations: 240</b>
<b>Children with Statement of SEN / EHC plan</b>	<b>Number Allocated</b>	
SEN (Special Educational Needs)	2	
<b>Admission Rule</b>	<b>Number Allocated</b>	
Children Looked After Or Previously Looked After	3	
Medical/Social	0	
Siblings	93	
Children of Staff	1	
Children Living In Parish Of Wheathampstead On A Random Basis	31	
Children Living In Parish Of Harpenden On A Random Basis	4	
Distance	106	Home to school distance of most distant child admitted 985.19 m
Non Ranked Allocation	0	

This school is its own admitting authority. Hertfordshire County Council administers allocations on behalf of the school.

Appendix 3: Applications received by parish/town of residence 2017-18 entry.

Link: as Appendix 2 – follow year and link to Allocation Day statistics.

Secondary Applicants:

Secondary, Upper & UTC Applications and Allocations as at 1 March 2017

District	Parish	Allocated preference										Total	% Ranked Allocations
		P1	P2	P3	P4	LP1	LP2	LP3	LP4	Ontime NRA	Late NRA		
	Wymondley	6	4	0	0	0	0	0	0	1	0	11	90.91
	<b>Total</b>	<b>1097</b>	<b>91</b>	<b>12</b>	<b>9</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>35</b>	<b>6</b>	<b>1256</b>	<b>96.74</b>
St Albans District	Colney Heath	55	9	5	1	0	0	0	0	9	1	80	87.5
	Harpenden	408	16	8	4	0	0	0	0	6	1	443	98.42
	Harpenden Rural	7	0	0	0	0	0	0	0	0	0	7	100
	London Colney	99	4	3	4	0	0	0	0	6	0	116	94.83
	Redbourn	59	4	3	1	0	0	0	0	2	0	69	97.1
	Sandridge	166	12	9	1	0	0	0	0	5	0	193	97.41
	St Albans	538	113	44	34	0	0	1	0	58	2	790	92.41
	St Michael	5	0	1	0	0	0	0	0	0	0	6	100
	St Stephen	109	27	8	10	0	0	0	0	12	0	166	92.77
	Wheathampstead	64	8	6	2	0	0	0	0	5	0	85	94.12
	<b>Total</b>	<b>1510</b>	<b>193</b>	<b>87</b>	<b>57</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>103</b>	<b>4</b>	<b>1955</b>	<b>94.53</b>

Primary Applicants:

North Hertfordshire District Total		1654	20	1674
St Albans District	Colney Heath	72	1	73
	Harpenden	419	2	421

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Primary Applications and Allocations as at 18 April 2017

District	Parish	Ontime Applicants	Late Applicants	Total Applicants
	Harpenden Rural	5		5
	London Colney	108	2	110
	Redbourn	67		67
	Sandridge	134	6	140
	St Albans	910	5	915
	St Michael	3		3
	St Stephen	135	2	137
	Wheathampstead	98	3	101
<b>St Albans District Total</b>		<b>1951</b>	<b>21</b>	<b>1972</b>
Stevenage	Stevenage	1158	10	1177