

Hertfordshire County Council's response to ED81 – Supplementary Statement of Common Ground as agreed between North Hertfordshire District Council and Bloor Homes and The Crown Estate concerning secondary education provision East of Luton

1. The Statement of Common Ground (SoCG) document ED81 was received by Hertfordshire County Council (HCC) on 6th February 2018, the day before the hearing session on Matter 10 – the housing allocations and the settlement boundaries: Luton (Cockernhoe). The SoCG is an agreement between the District Council and the two parties promoting development to the East of Luton. It relates to the education provision for the East of Luton sites. HCC, as the statutory authority with a duty to secure education, is not a party to the SoCG and was not consulted on its production.
2. HCC is grateful to the Inspector for allowing the submission of a written response to the points made within the SoCG.
3. In its Matters 10 statement HCC detailed its case for the need to identify 8 forms of entry (FE) of additional secondary school capacity to meet the anticipated pupil yield arising from the proposed new housing growth across the Hitchin Secondary Planning Area (SPA) within NHDC's Local Plan. This includes the sites East of Luton (see map at Appendix A).
4. Within the Hitchin SPA, NHDC latest proposals include the following housing growth within the Plan period to 2031:

East of Luton – 2100
Hitchin villages – 1221 (i.e. those villages within the Hitchin SPA identified for growth in the Local Plan)
Hitchin town - 1009
TOTAL = 4330
5. Using the agreed pupil yield calculation of 500:1FE, this scale of new housing growth will yield up to 8.66FE of secondary need (and the same for primary need). However, as a proportion of existing pupils in the villages look to Welwyn Garden City for their secondary education, HCC has assumed this pattern of migration will continue and needs to reduce the demand from proposed housing in the villages by 0.5FE.
6. Therefore the total secondary demand from the proposed scale of new housing across the Hitchin area is 8.16FE (rounded to 8.2FE). The time when this demand will be experienced is dependent on the rate at which the identified housing is provided (recognising that there is typically a lag between new dwellings being occupied and secondary education need arising). The timing of demand is discussed further below.

7. HCC's Matters 10 statement further outlines the immediate need for an additional 3FE as a result of rising demand from the existing community (i.e. irrespective of new housing growth), and that the planned expansions of both Hitchin Boys' School and Hitchin Girls' School by 1.5FE will deliver this additional 3FE of capacity from 2018. This capacity is to meet existing need. It cannot be relied upon to cater for the 8.2FE of anticipated yield from proposed new housing. Indeed, even with this additional secondary capacity, forecasts indicate all three of the existing secondary schools which serve Hitchin and the surrounding villages will be full and further places will be required to meet the rising need from the existing community by 2023, not accounting for any additional demand arising from new housing growth.
8. The timing of when the pupils from new housing will arrive and require a school place is very much dependent upon the trajectories for house building; which is not within the control of either HCC, or indeed entirely NHDC as the Local Planning Authority.
9. However, based on house building completion information received from NHDC, Appendix B provides a breakdown of forecast demand from the existing community (summer term 2017 forecast without new housing) and the anticipated yield from new housing informed by HCC's Pupil yield model. This new housing is grouped into three areas: Hitchin town, Hitchin villages and East of Luton. For the period from 2028 – 2031, which lies beyond the normal 10 year period used for school planning, it has been assumed that the demand from the existing community remains constant, in the absence of any more detailed information at this time. However, it is likely that demand from the existing community will fluctuate; it may go up or down.
10. The latest forecast, produced in summer 2017, indicates that without any new housing, all three secondary schools in Hitchin will be full or virtually full throughout the forecast period. Although it is usual to plan for a margin to account for fluctuations in demand, no margin has been included in these forecast figures.
11. Appendix B projects, therefore, a need for at least 4.4fe within the Plan period (to 2031) but this is very much dependent upon the trajectory of house building completions which, as outlined in paragraph 8 above, is outside the control of either HCC as education authority or NHDC as Local Planning Authority. The assumed trajectory upon which the pupil yield model is based may not reflect actual reality and, as it is in the future, there is no guarantee that either the new housing is not delivered earlier or indeed the secondary yield does not arise earlier than anticipated.

12. Notwithstanding this, the forecast projects an absolute deficit of places across the Hitchin SPA from 2021. The total demand from new housing peaks at over 8FE towards the end of the 2030s, with no margin. The secondary capacity required may rise above this should the demand from the existing community fluctuate.
13. There is a clear evidence of a need for an additional 8fe to meet the yield from the scale of growth NHDC is proposing within its Plan. Although secondary yield could lag behind the demand for primary places, notwithstanding that housing growth may be delivered earlier in the Plan period, HCC needs to plan for this within the Plan period so HCC can be sure that additional places can be delivered in time to cater for that arising demand.
14. The County Council would propose to establish a 6FE secondary school within the East of Luton development to meet the needs arising both from the housing growth and the existing communities in the Hitchin villages for whom this school would be their nearest.
15. The three existing secondary schools within Hitchin serve the town and surrounding villages. With these three schools currently being the nearest schools for families living in the Hitchin villages, existing children currently living in these villages look to Hitchin for their secondary education.
16. However, a new school at East of Luton would be the nearest school for many of the existing Hitchin villages who would increasingly look to or naturally be expected to be allocated a place at East of Luton as their nearest school. The new school East of Luton would serve both the existing communities in the nearest Hitchin villages and new pupils arising from the new housing proposed in those villages, as well as the pupils moving into the new East of Luton development. At 6FE, this new school would be of a size both to be viable and to cater for the needs arising from both the East of Luton development and the surrounding Hitchin villages, as well as alleviating some of the existing pressure for places at the three Hitchin secondary schools.
17. It would therefore be the County Council's strategy to establish a new 6FE school at East of Luton in advance of increasing secondary capacity further in Hitchin itself. However, if land is not made available to meet the full demand, the ability to make appropriate provision will be compromised. Without securing this capacity, there would be insufficient identified secondary places to meet the anticipated future demand from the scale of growth proposed by NHDC across the area.
18. Failing to establish secondary provision in the heart of the East of Luton development would leave this new community with no access to secondary

education in Hitchin. As outlined above and in our Matters statement, the Hitchin schools are full with increasing pressure from the town itself and therefore the new pupils East of Luton would be unable to secure a secondary school place in Hitchin. Establishing a school early in the Plan period at East of Luton would meet immediate demand from this new community as well as provide secondary places for existing Hitchin village communities and yield from new housing growth in the villages for whom it would be their nearest school. It is possible that existing Luton communities would look to this new school for a secondary place but HCC is has not accounted for Luton pupils within its strategy.

19. Paragraph 72 of the NPPF makes it clear that LPAs are expected to take a proactive, positive and collaborative approach to meeting the requirement of ensuring that a sufficient choice of school places is available to meet the needs of existing as well as new communities. HCC needs to secure the appropriate infrastructure now to meet the needs of the growth proposed to 2031 in the Local Plan to ensure sufficient capacity is available for the long term. Not doing so risks there being insufficient school places to meet those new communities' needs. New capacity cannot be simply added at the point that the demand arises but needs to be planned for in advance, especially in terms of the provision of built accommodation and associated facilities.
20. HCC is therefore seeking a land allocation at East of Luton capable of delivering 6FE of secondary capacity in addition to the 4FE of primary capacity (the latter being solely to meet the development's own needs).
21. NHDC's SoCG makes reference to a previous response by HCC to a Bloor Homes planning application for 1050 homes East of Luton. This outlined an all-through education solution to meet both the then 2FE secondary yield from a development of the scale then proposed and the additional demand from the surrounding Hitchin villages for which this new school would be the nearest.
22. The context at that time was that the housing growth for East of Luton was more limited than as now set out in the Local Plan. If a 6FE secondary school had been provided, there was not (at that time) any prospect of sufficient pupils to fill it. However, HCC made it clear that an all-through school with only 4FE for secondary provision was a sub-optimal education solution; that its policy preference was for secondary schools of at least 6FE; that it had concerns round viability; and urged NHDC to masterplan the area as a whole bringing forward a sufficient quantum of new housing to support the size of secondary provision that would be considered viable.

23. HCC's letter of response in relation to the Bloor proposal was submitted in June 2015. Since that time the risks referred to in that letter round the financial viability of small schools have become markedly more significant, government policy round schools funding has become clearer, and the adverse impact of financial pressures on standards and viability locally have become more pronounced. Each of these changes strengthens HCC policy position that secondary school provision for the future needs to be planned on the basis of school sizes of 6FE or greater.
24. In September 2017, the Department for Education announced in a written reply to a Parliamentary Question asked by the Member of Parliament for Oxford West & Abingdon, Layla Morgan, that more than a third of schools in England were in budget deficit.
25. Since 2015/16 funding for schools per pupil, adjusted for inflation, has declined and is expected to decline further as set out in HCC Matters 10 Luton (Cockernhoe) Appendix A statement. For 2018/19 per pupil funding for Hertfordshire schools will decline, after inflation, by a further 1%.
26. Set out below is a listing of secondary schools in Hertfordshire as at January 2018 with less than 600 pupils aged 11-16 and their most recent Ofsted ratings (for sponsored academies, the rating of precursor schools). It can be seen that 5 out of 11 of these schools were rated as Requires Improvement or Inadequate – 45% of the total. For Hertfordshire schools as a whole, only 8% are rated Requires Improvement or Inadequate on their most recent inspection.
27. Of the 6 schools which were rated as Good, each of them receives additional funding over and above their school budget share. This funding is time-limited. All these schools currently have the capacity to admit more than 600/4FE of pupils and HCC expects in the longer term that they will continue to be or become viable largely on the basis of attracting more pupils in excess of 4FE in a context of overall rising demand for school places.

School Name	Governance Arrangements	Ofsted Rating
Goffs Churchgate	ACADEMY	Requires Improvement
The Sele School	ACADEMY	Good
Meridian School (Upper)	ACADEMY	Good

Fearnhill School, Mathematics and Computing College	FOUNDATION	Good
The Astley Cooper School	FOUNDATION	Good
Adeyfield School	FOUNDATION	Requires Improvement
Nicholas Breakspear Catholic School	ACADEMY	Good
Mount Grace School	ACADEMY	Inadequate
Sir Frederic Osborn School	FOUNDATION	Requires Improvement
Townsend C of E School	VA	Good
Robert Barclay Academy	ACADEMY	Inadequate

28. Towards the end of 2016, NHDC issued its final draft Local Plan. This included around an additional 500 dwellings across the Hitchin area. These latest housing numbers, as outlined above, require the identification of a further +6FE of secondary capacity beyond the +2FE at The Priory in order to make the Plan sound.

29. Notwithstanding this and in any event, the quantitative and qualitative justification for the sustainability of larger schools has become more marked, as set out in Appendix A to HCC's Matters 10 statement. HCC, as local authority with responsibility for education, does not support the establishment of new 4FE secondary schools.

30. To reflect the above and make the Plan sound, HCC proposes the following modifications to the relevant parts of Policy SP19 and associated supporting text as appropriate:

Policy/paragraph	Proposed Modifications
SP19(e) P. 71	4FE of primary-age and 4FE of secondary-age education provision to ensure the needs arising from this allocation can be met within the site with any secondary education solution designed so as to enable the provision of a 6FE secondary school.
4.222 P.72	... This will be achieved, in part, by ensuring that education needs arising from the allocation will be met within the site itself. It will be necessary to ensure additional secondary provision up to

	6FE in this location is deliverable to meet the wider needs across the rural west of the District.
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