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Christina Downes BSc DipTP MRTPI
The Planning Inspectorate
BY EMAIL ONLY

21st October 2022

Dear Ms Downes,

REF: APP/P0119/W/21/3288019 – LAND WEST OF PARK FARM, THORNBURY, SOUTH GLOUCESTERSHIRE EDUCATION

My name is Ben James Hunter BA DipMS. I am Associate Director of Education Facilities Management Partnership Limited (“EFM”). I have been an Education Consultant for EFM since September 2017 (Associate Director since April 2022). Prior to this I was Development Manager of Northamptonshire County Council (as was) with the responsibility of securing Education planning obligations between 2009-2017. The majority of my professional career has been involved with the delivery of Education infrastructure.

I have been asked by BDSL and the North West Thornbury Landowner Consortium (“Barwood”) to answer some specific questions raised during the Planning Appeal discussed above in relation to Education. These questions are detailed below with my response.

1. What will happen to Primary School age pupils who move to the development in the period before the school is opened? Is there capacity for them elsewhere in existing Primary Schools that could serve the development?

The development is 1.3 miles walking distance to Gillingstool Primary School, which as of the previous academic year (2021/22) was operating at 66% of its capacity with 72 spare places. Additionally, as of the previous academic year, St Mary’s Primary School (1-mile walking distance from the development), Christ the King Primary School (0.9 miles walking distance), and Crossways Infant/Junior School (1.1 mile walking distance) were all operating under capacity with surplus places throughout the Year Groups. There was (2021/22) sufficient spare capacity for over 340 new dwellings before the schools were at capacity. This demonstrates that there is currently capacity for the first tranche of pupils coming forward on the development site prior to the Primary School being delivered.

New school provision tends to open from the bottom up (i.e. Year Reception and Year 7 first, as discussed further below). The increase in numbers yielded from housing is seen principally in these Year Groups. Those that are already in school nearby who move into new houses are likely to stay at

their existing school, but in the event that they come from further afield or wish to move then they can be accommodated in other Thornbury Schools. There is also the consideration that a proportion of pupils will attend Independent Schools. Therefore, the likely impact on the school system will be less than forecast in the early years of the development, and should be focused in either Reception Year or Year 7, as any other year group would likely necessitate a change of school.

It should be noted (although there is no suggestion that this will be necessary due to the surplus capacity in the system) that the Department for Education recommends in their best practice guidance that temporary accommodation is provided should it be needed prior to a new school opening. This is an option for SGC should it be required, if construction of the school experiences delays, for example. The current surplus capacity suggests that the school system will be able to accommodate 10 pupils per year group without the need for temporary expansions or “bulge classes”.

2. How do new Primary Schools in developments operate?

Schools are not financially and operationally viable until you have circa 18 four-year-old children to predominantly fill Reception Year, which is considered the standard critical mass. New schools would usually open in Reception Year only in the first year of opening; those pupils would move on to Year One and be replaced by a new Reception Class, meaning that the school will not be open in Years Reception to Year Six until the seventh year (a full one form of entry). Schools do not want to open too early as this attracts potential pupils from other areas as parents often prefer new schools to older, more established facilities. According to the admissions criteria of the school, if there is capacity, any child applying within the appropriate admissions window can secure that place.

3. Is there sufficient capacity within secondary schools close to the site in order to meet the needs arising from the development?

According to SGC’s child yield multipliers, a development of 595 dwellings is expected to generate a total of 113 Secondary School aged pupils. The Castle School is 0.7 miles walking distance from this development site. This is a school with a capacity of 1,733 places (SCAP 2021) that as of the 2021/22 academic year was operating with a roll of 1,538 pupils (195 spare places). This exceeds the expected child yield of this development. It should also be noted that the school draws pupils from a very wide geographical area, including children from as far south as Bradley Stoke, which is over 7-miles from the school (see Appendix A). Bradley Stoke is much closer to, for example, Marlwood School, which was operating with a roll of 497 in 2021/22, against a published capacity of 1,365 (868 spare places). However, whilst the published capacity of the school is 1,365 (via the DfE) based on the new admissions number of the school of 150 pupils per Year Group (September 2022) the school has a practical capacity of 750 places in Years 7-11.

If the number of Secondary School aged pupils in Thornbury increases, then pupils who are applying to attend the school from much further afield will be allocated a place at a school closer to their

immediate vicinity if the school is oversubscribed. More pupils attending from Thornbury itself will increase the sustainability of the school, as pupils from Thornbury will be unlikely to need to travel by car to the school. It is the intention of the Government to encourage sustainable travel (walking/cycling).

When the DfE allocates funding to an Education Authority for new school places (known as “Basic Need” funding) they consider an entire planning area. If there is a deficit of school places within that planning area, then funding is allocated per pupil place that the area is over capacity. If there is not a deficit, then no funding is allocated. The Thornbury and Alverston Secondary Planning Area, which consists of two schools (The Castle School, and Marlwood School) is forecast to have 864 surplus capacity in 2027/28. This means the DfE will allocate no funding to the area. SGC recognise this, and have, correctly, not requested funding from this development to expand the planning area.

Moving forward, it is proposed that a Special School will be developed at Marlwood School, utilising land/accommodation freed up by the lower roll. The school was able to reduce its operating capacity on the basis of sufficiency of places in the area.

It should be noted, however, that the actual capacity of the Marlwood School is immaterial to this planning appeal. Due to the significant area that the Castle School draws pupils from, if Thornbury increases the number of Secondary School aged pupils within the town, then future pupils applying from further afield (outside of the town) will be allocated a place at a school closer to their home location. There is no justification for planning obligations, and SGC (as the body with the statutory responsibility to ensure sufficient pupils for their area) was correct to not request any from this development for additional Secondary School places. Collectively, the two schools have more than sufficient capacity to accommodate the pupils of this and neighbouring developments, as detailed by SGC in the Tables below:

	7	8	9	10	11
Marlwood Secondary School	118	118	111	97	81
Planned admission Number	150	210	210	210	210
The Castle	214	248	244	268	266
Planned admission Number	270	270	270	270	270
Overall Surplus	88	114	125	115	133
Numbers from Dev	23	23	23	23	23

Moving forward four projections show the Yr 7 intake remaining fairly similar to what it is now

Year	11-16 PAN	Surplus	7	8	9	10	11	12	13	Total	7-11	16+
2223	420	-88	332	360	351	351	334	142	147	2016	1727	289
2324	420	-80	340	335	369	347	349	160	132	2031	1739	292
2425	420	-79	341	347	344	367	345	169	148	2060	1743	317
2526	420	-82	338	349	355	341	364	168	157	2072	1747	325
2627	420	-66	354	346	357	352	338	177	156	2081	1748	333
2728	420	-69	351	361	354	353	350	165	165	2099	1769	330

NB Year 8-11 Numbers 22/23 are projected to the end of the academic year and will vary from numbers presented in the first table above as these are taken from the Summer 22 census.

Table 1 and 2: School Roll Data (via SGC)

It is also important to point out the fact that SGC has had many opportunities, since 2019, to request funding from this development site towards additional Secondary School places should they feel they were justified. This includes opportunities as recently as w/c 10th October 2022. They have not changed their stance, and as discussed in this letter, they are correct in their approach, as contributions for Secondary School provision would not fulfil the tests of CIL Regulation 122; specifically, necessary to make the development acceptable in planning terms.

It should also be noted that there are other developments coming forward in Thornbury. There are at least five developments other than this development, expected to bring forward circa 549 dwellings. This is the equivalent of a child yield of 99 Secondary School aged children. The first point to raise is that there is already more than this total capacity in The Castle School (195 spare places in the 2021/22 academic year). The second point to make is to reaffirm that if the Secondary School population grows in Thornbury, this will simply mean that pupils applying from outside of the schools linked area will be assigned a place at a school nearer to their immediate locality. There is no suggestion that SGC will be unable to fulfil their statutory duty of providing sufficient pupil places for their area.

4. How did the LEA arrive at the proposed financial contributions of £4,207,899 Index Linked for the Primary School and £620,000 Index Linked for the Nursery?

The DfE's best practice guidance states that: *We advise that you base the assumed cost of mainstream school places on national average costs published in the DfE school place scorecards.* A development of 595 dwellings is expected to generate 202 Primary School aged pupils, and 60 Early Years aged pupils. This would make the cost per pupil place at £20,831 for Primary, and £10,333 for Early Years.

The most recent DfE Scorecard (2021) details the average new Primary School cost per pupil place in the UK as £21,559. When you apply the regional weighting of South Gloucestershire (1.01010101) to this figure, you get £21,343. This is broadly in line with the figure requested by SGC in relation to this development, plus indexation. The space required for Early Years provision is significantly less than that of standard Primary School provision, hence the lower figure requested per pupil place.

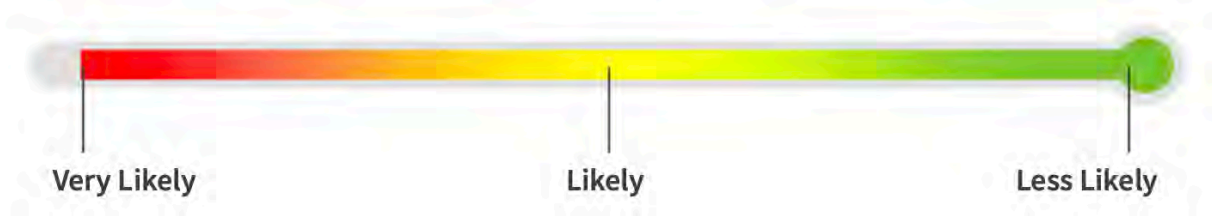
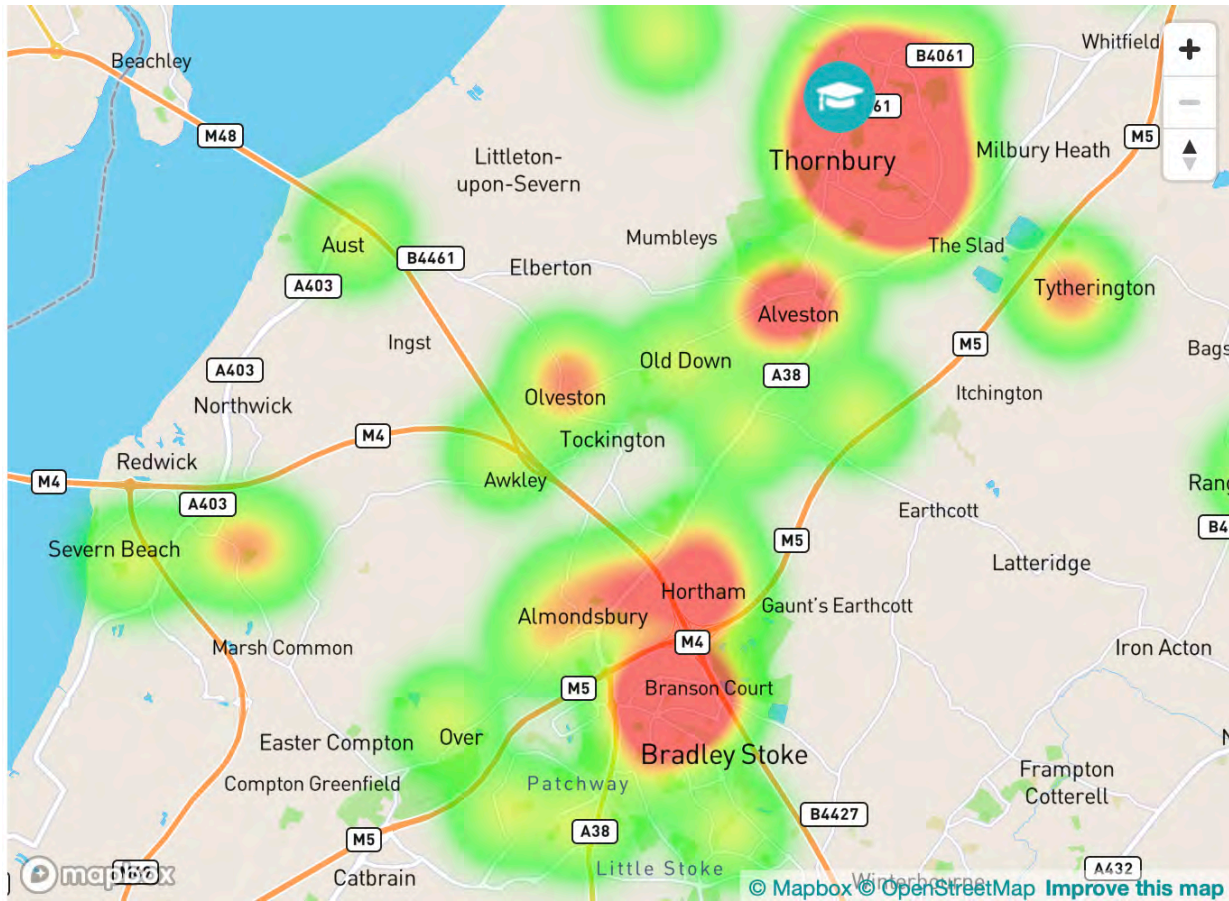
Please let me know if you need anything further, or would like to discuss.

Sincerely,



Ben Hunter
Associate Director of EFM
On behalf of Barwood

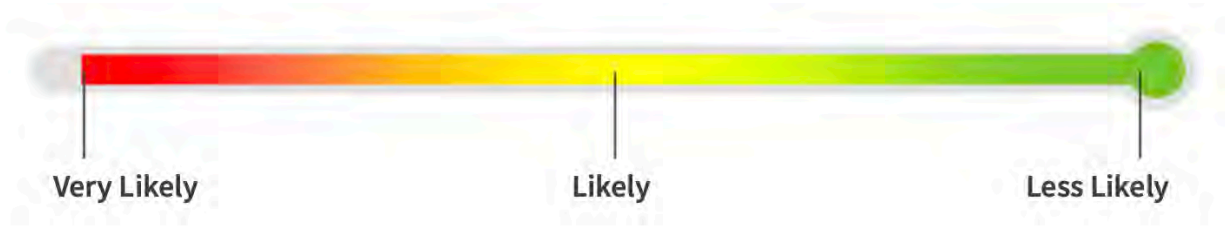
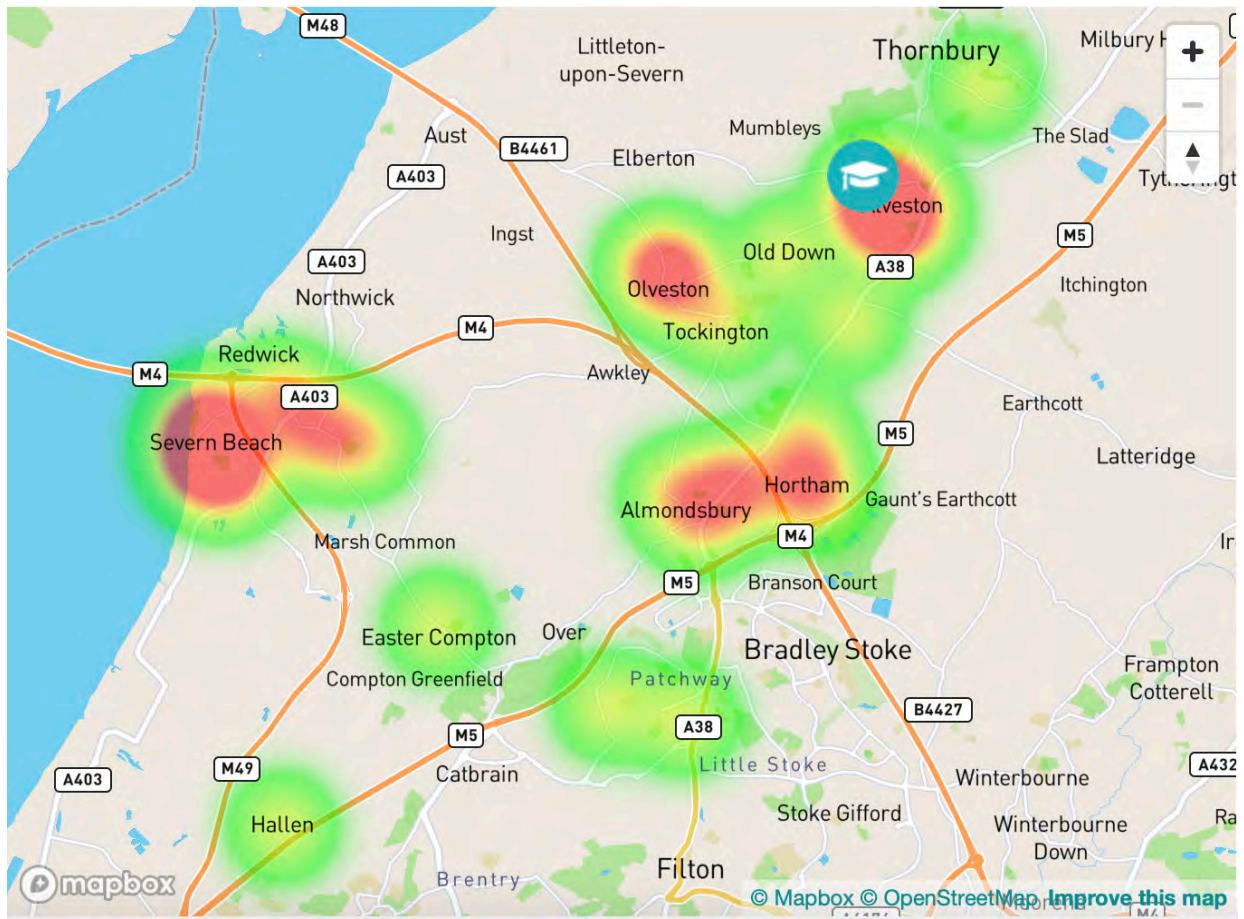
Appendix A – School Catchment Area Heat Map for The Castle School, BS35 1HT (via schoolguide.co.uk)



This pupil heat map shows where pupils currently attending the school live. The concentration of pupils shows likelihood of admission based on distance criteria

Source: All attending pupils National School Census Data 2021, ONS

Appendix B – School Catchment Area Heat Map for Marlwood School, BS35 3LA (via schoolguide.co.uk)



This pupil heat map shows where pupils currently attending the school live. The concentration of pupils shows likelihood of admission based on distance criteria

Source: All attending pupils National School Census Data 2021, ONS