



ALFREDSON YORK  
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Land at Dinting Vale,  
Glossop  
Education Impact Assessment  
for Wainhomes

**14<sup>th</sup> September 2022**

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for

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# 1. Introduction

## 1.1. Report Purpose & Scope

1.1.1. I have been asked to consider the proposed development for its likely impact on social infrastructure in the local area.

1.1.2. The purpose of this report is to act as a principal point of reference for future discussions with the relevant local authority to assist in the negotiation of potential Section 106 agreements pertaining to this site. This initial report includes an analysis of the request for contributions pertaining to local school places against the prescribed tests for such contributions.

1.1.3. It is acknowledged that if the impacts of the proposed development legitimately call for a S106 contribution due to capacity problems, that meet the requirements of the Community Infrastructure Levy (CIL) regulations, then it is accepted that a contribution should be offered.

## 1.2. Intended Audience

1.2.1. The intended audience is the Client, as well as, potentially, the relevant local Councils.

## 1.3. Research Sources

1.3.1. The contents of this initial report are based on publicly available information, including relevant data from central government and the local authority and on information obtained through requests under the Freedom of Information Act. Research for this report was conducted in August 2022.

#### 1.4. Community Infrastructure Levy Regulations

- 1.4.1. The Community Infrastructure Levy (“the levy”) Regulations came into force in April 2010. The levy is intended to provide infrastructure to support the development of an area rather than to make individual planning applications acceptable in planning terms. As a result, there may still be some site-specific impact mitigation requirements without which a development should not be granted planning permission
- 1.4.2. However, in order to ensure that planning obligations and the levy can operate in a complementary way and the purposes of the two regimes are clarified, the regulations scale back the way planning obligations operate. Limitations are placed on the use of planning obligations in three respects.
- 1.4.3. The first of these, which is the relevant consideration in this matter, is putting the Government’s policy tests on the use of planning obligations set out in Circular 5/05 Planning Obligations on a statutory basis for developments which are capable of being charged the levy.
- 1.4.4. The regulations place into law for the first time the Government’s policy tests on the use of planning obligations. The statutory tests are intended to clarify the purpose of planning obligations in light of the levy and provide a stronger basis to dispute planning obligations policies, or practice, that breach these criteria. This seeks to reinforce the purpose of planning obligations in seeking only essential contributions to allow the granting of planning permission, rather than more general contributions which are better suited to use of the levy.
- 1.4.5. From 6 April 2010 it has been unlawful for a planning obligation to be required as a material consideration in order for a planning authority to lawfully grant permission when determining a planning application for a development, or any part of a development, that is capable of being charged the levy, whether there is a local levy in operation or not, if the obligation does not meet all of the following tests:
- (a) Necessary to make the development acceptable in planning terms;
  - (b) Directly related to the development; and
  - (c) Fairly and reasonably related in scale and kind to the development.
- 1.4.6. From 1<sup>st</sup> September 2019, revised regulations came into force. Amongst other things this introduces a requirement on CIL charging authorities to produce an annual statement regarding sums received both through CIL and planning obligations.
- 1.4.7. These regulations also remove the limit of pooling no more than 5 planning obligations towards one item of infrastructure, which has been a particular issue with regards to the provision of education infrastructure.

## 1.5. Department for Education Guidance on Planning Obligations

1.5.1. In April 2019, the Department for Education (DfE) published "Securing developer contributions for education", non-statutory guidance for local authorities regarding seeking planning obligations towards education provision from residential development. This guidance is attached at Appendix AYA01.

1.5.2. Whilst this is non-statutory, it is important to consider elements of this guidance, as they would carry some weight in a planning context, although this clearly does not supersede or outweigh the CIL regulations as outlined above.

1.5.3. The purpose of the guidance is underpinned by four principles, as set out below:

- Housing development should mitigate its impact on community infrastructure, including schools;
- Pupil yield factors should be based on up-to-date evidence from recent housing developments;
- Developer contributions towards new school places should provide both funding for construction and land where applicable, subject to viability assessment when strategic plans are prepared and using up-to-date cost information;
- The early delivery of new schools within strategic developments should be supported where it would not undermine the viability of the school, or of existing schools in the area.

1.5.4. The first of these principles is of particular relevance to this report.

1.5.5. The guidance also sets out the following:

3. It is important that the impacts of development are adequately mitigated, requiring an understanding of:
  - The education needs arising from development, based on an up-to-date pupil yield factor;
  - The capacity of existing schools that will serve development, taking account of pupil migration across planning areas and local authority boundaries;
  - Available sources of funding to increase capacity where required; and
  - The extent to which developer contributions are required and the degree of certainty that these will be secured at the appropriate time.

1.5.6. However, it should be noted that nothing within this non-statutory guidance supersedes the tests set out at paragraph 1.4.5 above.

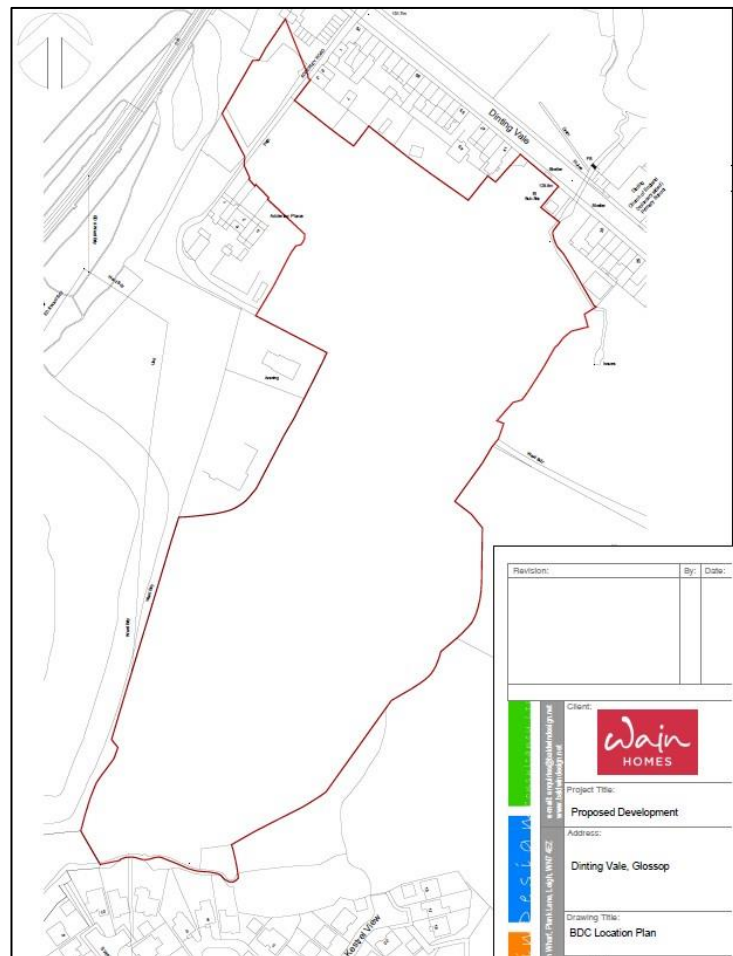
## 2. The Proposed Development

### 2.1. The Site

2.1.1. The proposed development site is at Dinting Vale, Glossop. The site lies within the planning remit of High Peak Borough Council (HPBC).

2.1.2. The site lies within the primary and secondary catchment areas of schools for which the local education authorities are Derbyshire County Council (DCC) and Tameside Council (TC).

2.1.3. The location of the site is as indicated below:



[source Location Plan, attached at Appendix AYA02]

## 2.2. Proposed Mix

2.2.1. The total number of units shown on the illustrative masterplan is 100 dwellings.

2.2.2. The indicative mix is set out below:

<b>Type</b>	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>	<b>Total</b>
<b>Market Housing</b>	6	41	32	21	<b>100</b>
<b>Total</b>	<b>6</b>	<b>41</b>	<b>32</b>	<b>21</b>	<b>100</b>

2.2.3. For the purposes of this report, distances to local Schools are measured from the existing road at Adderley Place.

### 3. The Local Position

#### 3.1. Derbyshire County Council and Tameside Council's Duty to Secure Sufficient School Places

3.1.1. The site lies within the area for which the responsible local education authorities are Derbyshire County Council (DCC) and Tameside Council (TC).

3.1.2. The Education Act 1996 (as amended) provides in section 14(1):

*"A local education authority shall secure that sufficient schools for providing - (a) primary education and (b) secondary education ... are available for their area".*

3.1.3. The Education Act does *not* state it is the duty of a local education authority to ensure that there are sufficient school places at the catchment or pseudo-catchment area school for all children residing within that particular school's catchment or pseudo-catchment area.

3.1.4. The Education Act simply states that the education authority must provide school education appropriate to the requirements of pupils for their area. In the case of DCC that is the area defined as the authority of Derbyshire. In the case of TC that is the area defined as the authority of Tameside.

3.1.5. This duty applies in relation to all the children in the local education authority area, whether they have lived there all their lives or have just moved into a new development.

3.1.6. The residential component of the proposed development will include family housing. Family housing often includes school age children who will seek to enrol in local schools. Those schools may or may not be sufficient to accommodate these children without the need for additional capacity to be provided.

#### 3.2. School Forms of Entry & Admissions Number

3.2.1. School capacity is often measured in terms of forms of entry ('FE'). A single class can typically accommodate up to 30 children. The Number on Roll ('NOR') is the number of children at a school.

3.2.2. Reception is the year of entry to primary school and is often referred to as "Year R". The subsequent year groups are often referred to as "Year 1" to "Year 6" respectively.

3.2.3. As primary schools have seven year-groups, a 2FE primary school would have capacity for 420 children [*calculation*:  $30 \times 7 \times 2 = 420$ ]; with 1FE of primary education provision equating to 210 primary school places.

3.2.4. Similarly, as secondary schools have five year-groups (starting with entry into Year 7), a 6FE secondary school would have capacity for 900 pupils aged 11-16 [*calculation*:  $30 \times 5 \times 6 = 900$ ]; with 1FE of secondary education provision equating to 150 secondary school places. Sixth form consists of two year-groups after secondary school.

3.2.5. All schools have a Published Admissions Number (PAN) which indicates the number of pupils the school can take in each year group. If this number is then multiplied by the number of year groups at the school, this gives an indicative capacity of the numbers that the school can theoretically accept.

### 3.3. Patterns of Pupil Migration

3.3.1. As there is likely to be movement of children between these respective schools' catchment areas, pseudo-catchment areas (based on furthest distances of places offered), designated areas, or priority areas, our analyses include schools within a reasonable distance of the proposed development.

3.3.2. This movement of children due to parental preference and other factors is often referred to as "inflow" and "outflow".

### 3.4. Local School Catchment Areas

3.4.1. Two miles is considered the maximum reasonable statutory walking distance to school for children aged 8 and under, and three miles for those over 8 years of age, as indicated by the DfE in its document "Home to school travel and transport guidance" [source: Appendix AYA03].

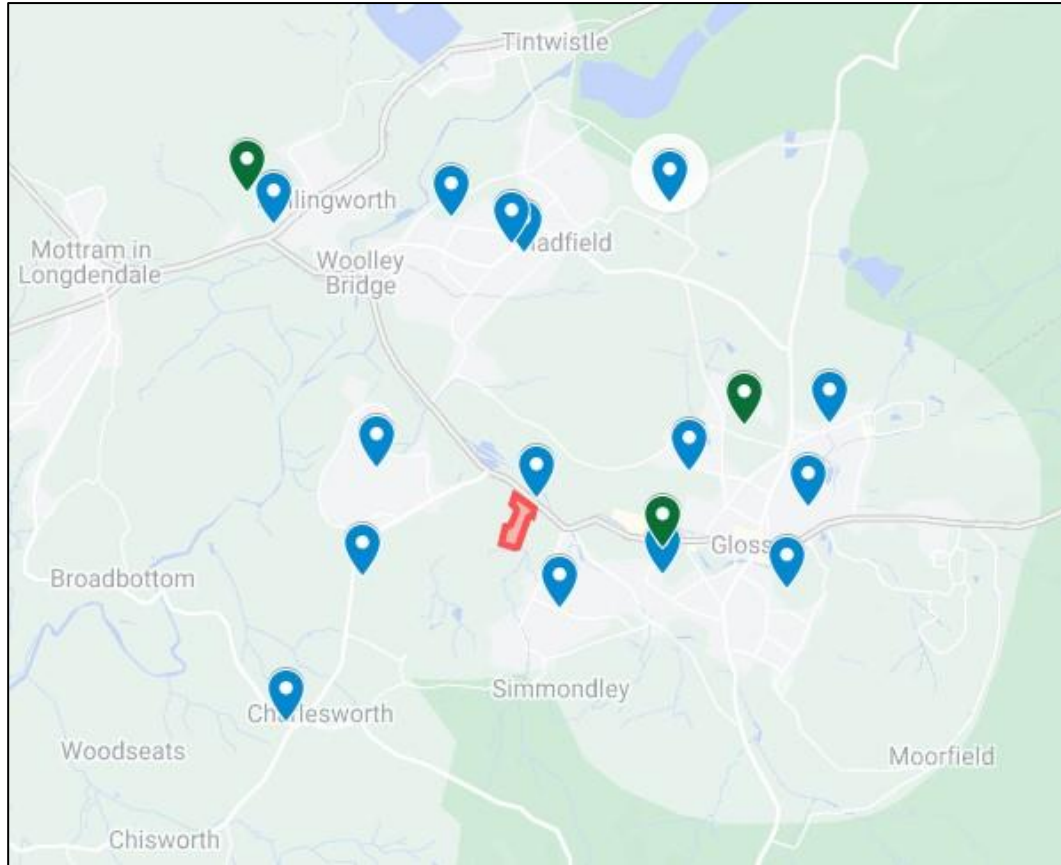
3.4.2. In order to assess the likely impact of the proposed development regarding primary school place provision we have considered the impact on schools within a two-mile walking distance of the proposed development site.

3.4.3. In order to assess the likely impact of the proposed development regarding secondary school place provision we have considered the impact on schools within a three-mile walking distance of the proposed development site.



3.5. Local Schools Relevant to the Proposed Site

3.5.1. The map below shows the schools referred to in the following sections in relation to the proposed development site:



### 3.5. Local Primary Schools – Current Baseline

3.5.1. There are fifteen primary schools within two miles of the proposed development.

3.5.2. According to the latest data available in the public domain in January 2022 the position at local primary schools (including infant and junior schools) is as shown below:

<b>Primary School</b>	<b>Walking Distance (miles)</b>	<b>Local Education Authority</b>	<b>Net Capacity</b>	<b>Number on Roll (NOR)</b>	<b>Surplus Places</b>
Dinting Church of England Voluntary Aided Primary School	0.2	Derbyshire	182	137	45
Simmondley Primary School	0.7	Derbyshire	315	292	23
Gamesley Primary School	0.7	Derbyshire	364	272	92
Whitfield St James' CofE (VC) Primary School	0.9	Derbyshire	360	311	49
St Margaret's Catholic Voluntary Academy	1	Derbyshire	161	25	136
St Luke's CofE Primary School	1.1	Derbyshire	210	210	0
Duke of Norfolk CofE Primary School	1.4	Derbyshire	330	320	10
St Andrew's CofE Junior School	1.4	Derbyshire	240	208	32
St Charles' Catholic Voluntary Academy	1.4	Derbyshire	222	191	31
St Mary's Catholic Voluntary Academy	1.4	Derbyshire	210	131	79
Hollingworth Primary School	1.6	Tameside	210	176	34
Hadfield Infant School	1.6	Derbyshire	210	169	41
Charlesworth Voluntary Controlled Primary School	1.6	Derbyshire	119	108	11
All Saints Catholic Voluntary Academy	1.6	Derbyshire	98	78	20
Padfield Community Primary School	2	Derbyshire	112	111	1
<b>TOTAL</b>			<b>3,343</b>		<b>604</b>

**Table:** Primary School pupil places within two miles of the proposed development

[Source: Number on Roll from School census data, January 2022, and Capacity from DfE website].

3.5.3. The above table uses the Audit Commission definition of Surplus Places, in line with best practice in this matter, which treats schools with a negative surplus as though they had a zero surplus. Since the number of pupils which a school must admit in any year is directly related to its capacity, any school that chooses to admit numbers beyond that level must necessarily be deemed to be capable of accommodating those numbers.

3.5.4. On the above evidence it is clear that in January 2022 there were 604 surplus primary school places within two miles of the proposed development.

3.5.5. The total surplus of places as a percentage of primary school capacity was **18.07%**  
[calculation:  $604 / 3,343$ ]

### 3.6. Secondary Schools - Current Baseline

3.6.1. According to the latest data available in the public domain, in January 2022, the position at local secondary schools within three miles of the development (including sixth form / Post 16 education) is shown below:

<b>Secondary School</b>	<b>Walking Distance (miles)</b>	<b>Local Education Authority</b>	<b>Net Capacity</b>	<b>NOR</b>	<b>Surplus Places</b>
St Philip Howard Catholic Voluntary Academy	0.8	Derbyshire	485	592	0
Glossopdale School and Sixth Form	1.3	Derbyshire	1200	1174	26
Longdendale High School	1.8	Tameside	900	804	96
<b>Total</b>			<b>2,585</b>		<b>122</b>

**Table:** Secondary School pupil places within three miles of the proposed development

[Source: Number on Roll from Census data, January 2022, and Capacity from DfE website].

3.6.2. The above table uses the Audit Commission definition of Surplus Places, in line with best practice in this matter, which treats schools with a negative surplus as though they had a zero surplus. Since the number of pupils that a school must admit in any year is directly related to its capacity, any school that chooses to admit numbers beyond that level must necessarily be deemed to be capable of accommodating those numbers.

3.6.3. On the above evidence it is clear that in January 2022 there were 122 surplus secondary school places within three miles of the proposed development site.

3.6.4. The total of surplus places as a percentage of secondary school capacity was **4.72%** [calculation: 122 / 2,585].

## 4. Impact & Mitigation of the Development

### 4.1. DCC Assessment of the Development's Impact and Requested Mitigation

4.1.1. DCC's assessment of the proposed development is attached at Appendix AYA04. At the time the assessment was provided, DCC made reference to the fact they were awaiting cabinet sign off for a new Developer Contributions Protocol.

4.1.2. As a result, DCC have provided two assessments. Under their developer contributions protocol at the time of issue, contributions would be sought as follows:

<b>SECTION 1 - Current Developer Contributions Protocol</b>					
	<b>Per 100 dwellings</b>	<b>Cost per pupil place</b>	<b>Cost per 1 dwelling</b>	<b>Cost per 10 dwellings</b>	<b>Cost per 100 dwellings</b>
Primary school	20 places	£17,176.59	£3,435.32	£34,353.18	£343,531.81
Secondary school	15 places	£25,881.90	£3,882.29	£38,822.85	£388,228.50
Post-16 education	6 places	£28,069.44	£1,684.17	£16,841.66	£168,416.63

4.1.3. On Primary education under the developer contributions protocol at the time of issue, DCC's justification for requesting contributions is as follows:

*"The proposed development falls within and directly relates to the shared normal areas of Simmondley Primary School and Dinting CE Voluntary Aided Primary School. The proposed development of 111 dwellings (excluding 6 x 1 bedroom) would generate the need to provide for an additional 25 primary, pupils.*

*Simmondley Primary School has a current net capacity of 315 pupils and has 253 pupils on roll currently. The latest projections show the number of pupils on roll to be 273 during the next 5 years.*

*Dinting CE Voluntary Aided Primary School has a current net capacity of 119 pupils and has 137 pupils on roll currently. The latest projections show the number of pupils on roll to be 147 during the next 5 years.*

*There are a number of recently approved planning applications within the normal area totalling 108 dwellings amounting to an additional 26 primary pupils.*

*The analysis of the combined current and future projected number of pupils on roll, together with impact of any approved planning applications, shows that the normal area primary schools would not have sufficient capacity to accommodate the 25 primary pupils arising from the proposed development."*

4.1.4. On Secondary education under the developer contributions protocol at the time of issue, DCC's justification for requesting contributions is as follows:

*"The proposed development falls within and directly relates to the normal area of Glossopdale School. The proposed development of 111 dwellings (excluding 6 x 1 bedroom) would generate the need to provide for an additional 21 secondary and 8 post 16 pupils.*

Glossopdale School has a net capacity of 1,200 pupils and currently has 1,099 pupils on roll. The latest projections are indicating the number of pupils on roll to be 1,244 during the next 5 years. There are a number of recently approved planning applications within the normal area totalling 387 dwellings amounting to an additional 77 secondary and 31 Post16 pupils.

Analysis of the current and future projected number of pupils on roll, together with the impact of approved planning applications shows that the normal area secondary school would not have sufficient capacity to accommodate the 21 secondary and 8 post16 pupils from the proposed development.”

4.1.5. In terms of mitigation under the developer contributions protocol at the time of issue, DCC stated that:

“The County Council would therefore would request financial contributions as follows:

- £429,414.75 for the provision of 25 primary places
- £768,075.42 for secondary and post 16 provision Glossopdale School”

4.1.6. Under DCC’s proposed developer contributions protocol at the time of issue, contributions would be sought as follows:

<b>SECTION 2 - Developer Contributions Protocol under consideration</b>					
	<b>Per 100 dwellings</b>	<b>Cost per pupil place</b>	<b>Cost per 1 dwelling</b>	<b>Cost per 10 dwellings</b>	<b>Cost per 100 dwellings</b>
Primary phase	24 places	£17,176.59	£4,122.38	£41,223.82	£412,238.17
Secondary phase (without Post16)	20 places	£25,881.90	£5,176.38	£51,763.80	£517,638.00
Secondary phase (with Post 16)	28 places	£26,506.91	£7,264.50	£7,421.94	£74,219.35
SEND	0.7 places	£96,202.99	£673.42	£6,734.20	£67,342.00

4.1.1. On Primary education under the revised developer contributions protocol at the time of issue, DCC’s justification for requesting contributions is as follows:

“The analysis of capacity at the normal area primary phase schools, namely Simmondley Primary School and Dinting CE Voluntary Aided Primary School remains the same as above. The proposed development of 111 dwellings (excluding 6 x 1 bedroom) however using the new pupil yield would generate the need to provide for an additional 25 primary pupils.”

4.1.2. On Secondary education under the revised developer contributions protocol at the time of issue, DCC’s justification for requesting contributions is as follows:

“The analysis of capacity at normal area secondary school, namely Glossopdale remains the same as above. The proposed development of 111 dwellings (excluding 6 x 1 bedroom) however using the new pupil yield would generate the need to provide for an additional 29 secondary phase (with post 16) pupils.”

4.1.3. On SEND education under the revised developer contributions protocol at the time of issue, DCC’s justification for requesting contributions is as follows:

*“The request for a contribution towards Special Educational Needs and Disability (SEND) provision is not subject to an analysis of capacity within a given geographical area, i.e. the locality within which the development is located. Rates of all types of SEND are increasing and special schools and Enhanced Resource School (ERS) units generally operate at or above capacity to avoid pupils being placed out of County. The pattern of provision across the County often involves pupils travelling a significant distance in order to access the most appropriate place to suit their needs. It is therefore not appropriate or possible to assess capacity against the need for places generated by any given development within any specific locality.*

*A contribution towards SEND infrastructure will be requested for developments of 100 dwellings or more.”*

4.1.4. In terms of mitigation under the revised developer contributions protocol at the time of issue, DCC stated that:

*“The County Council would therefore request financial contributions as follows:*

- £429,414.75 for primary provision*
- £768,700.39 for secondary phase (with post 16) provision at Glossopdale School*
- £96,202.99 for 1 SEND place”*

## 4.2. Likely Pupil Yield

4.2.1. Based on Derbyshire’s Pupil Yield calculation, the total number of school places required is determined by a formula which is based on statistical assessment of birth rate and housing occupancy data in Derbyshire using information from the 2011 census.

4.2.2. It should be noted that, the latest document available on the DCC website which outlines their Developer Contributions Protocol is dated 01/04/2022. As a result of this, when calculating an accurate pupil yield for the development, AYA has used the figures contained within DCC’s latest available Education Contribution Methodology, Appended at APPENDIX AYA05.

4.2.3. The expected Pupil Product from a new development is not based on the number of bedrooms the dwelling has, although the policy is clear that one bedroom dwellings are exempt. This is outlined in the table below:

	<b>1 Bed</b>	<b>2 Bed</b>	<b>3 Bed</b>	<b>4 Bed</b>
<b>Pupil Yield (Primary)</b>	0.00	0.24	0.24	0.24
<b>Pupil Yield (Secondary)</b>	0.00	0.20	0.20	0.20
<b>Pupil Yield (Post 16)</b>	0.00	0.08	0.08	0.08

4.2.4. Applying the figures in the table above, gives the following calculations of pupils arising from the proposed development:

	<b>1 Bed</b>	<b>2 Bed</b>	<b>3 Bed</b>	<b>4 Bed</b>	<b>Total Pupil Yield</b>
<b>Pupil Yield (Primary)</b>	0.00	9.84	7.68	5.04	<b>22.56</b>
<b>Pupil Yield (Secondary)</b>	0.00	8.20	6.40	4.20	<b>14.60</b>
<b>Pupil Yield (Post 16)</b>	0.00	3.28	2.56	1.68	<b>7.52</b>

#### 4.3. The Trend in Annual Local Birth Numbers

4.3.1. The Office for National Statistics (ONS) birth rate figures show the total annual births within Derbyshire is currently at its lowest level in the past seven years. Births within High Peak have also fallen to their lowest level since a peak in 2017. Specifically, births within Dinting have been relatively stable since 2017.

4.3.2. This is best illustrated by the table below:

<b>Area</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
<b>Derbyshire</b>	7,839	7,866	7,861	7,820	7,563	7,416	7,336	7,002
<b>High Peak</b>	866	882	842	890	903	824	843	756
<b>Dinting</b>	11	11	18	17	23	21	25	21
<b>Current / Future School Year</b>	2025 Year 7						2031 Year 7	

4.3.3. Those children born in 2013 would now be in Year 3 and the 2019 births will be due to start primary school in September 2024.

4.3.4. Birth rates have declined in High Peak by over 4.5FE from the peak in 2013 to 2020.



#### 4.4. Forecast Status of Pupil Places

4.4.1. Based on the DCC & TC FOI responses, the likely future requirement for school places for the Primary Schools identified in section 3.5 is set out below:

Primary Schools	Relevant Schools / Number of Schools in Planning area	Actual and Forecast Capacity		Actual and Forecast Numbers on Roll		Surplus / Deficit Places	
		22/23	26/27	21/22	26/27	22/23	26/27
All Derbyshire Schools listed in Section 3.5.2	N/A	3,133	3,133	2,563	2,526	570	607
Tameside Planning Area 3570003	1 / 3	7,980	7,980	6,985	6,734	995	1,246

**Table:** Forecast Primary School pupil places by academic year

[Source: School Forecast Data from DCC & TC FOI responses, appended at APPENDIX AYA06]

4.3.5. On the basis of these primary school forecasts and school capacities, it is clear that primary school surplus places across all schools within 2 miles of the proposed development site are forecast to increase to the end of the forecast period.

4.3.6. There is an acceptable level of surplus within both the Derbyshire Schools and the relevant Tameside planning areas to support the impact of this development.

4.3.7. Commentary on the relevance of this position with regards to the education mitigation strategy is set out below.

4.3.8. Based on the DCC & TC FOI responses, the likely future requirement for school places for the Secondary Schools identified in section 3.6 is set out below:

Secondary Schools	Relevant Schools / Number of Schools in Planning area	Actual and Forecast Capacity		Actual and Forecast Numbers on Roll		Surplus / Deficit Places	
		22/23	27/28	22/23	27/28	22/23	27/28
All Derbyshire Schools listed in Section 3.5.2	N/A	1,685	1,925	1,847	1,798	162	127
Tameside Planning Area 3570004	1 / 16	15,426	15,4256	15,241	15,346	185	80

**Table:** Forecast Secondary School pupil places by academic year

[Source: School Forecast Data from DCC & TC FOI responses, appended at APPENDIX AYA06].

4.3.9. On the basis of these DCC school forecasts and school capacities it appears that the current shortfall of secondary school places will be addressed by the expansion of Glossopdale School. The increased capacity will mean that there will be a surplus of available Secondary school places over the coming years to 2027/28 within the Derbyshire schools listed at 3.5.2.

- 4.3.10. On the basis of these TC school forecasts and school capacities it appears that the small surplus of secondary school places within the relevant Tameside planning area will reduce slightly over the coming years to 2027/28 , at which point there will be a small surplus of places within the relevant Tameside planning area.
- 4.3.11. On the above evidence it is clear that for the academic year 2027/28 there will be a surplus of secondary school places available within three miles of the proposed development site.
- 4.3.12. It should be noted that capacity includes post 16 provision.
- 4.3.13. Commentary on the relevance of this position with regards to the education mitigation strategy is set out later in this Report. It is not clear what assumptions regarding housing delivery are included within the forecasts.

#### 4.5. AYA Analysis of the case for mitigation

- 4.5.1. The local primary schools in Derbyshire within two miles have a significant level of surplus places, at 570 places currently and, given that the forecast for these DCC primary schools within two miles of the proposed development sees an increase in surplus places from 570 to 607 places to the end of the forecast period, it is highly likely that there will remain sufficient surplus to accommodate the yield from the proposed development to the end of the forecast period.
- 4.5.2. In addition to this, the relevant Tameside primary planning area to this development are also forecasting an increase in surplus places the end of the forecast period.
- 4.5.3. At secondary level, the schools within three miles of the proposed development currently have a deficit of places, which is being addressed by a funded expansion of Glossopdale School. By the end of the forecast period, DCC are forecasting a surplus of Secondary School places.
- 4.5.4. In addition to this, the relevant Tameside secondary planning area to this development are also forecasting a surplus of places the end of the forecast period.
- 4.5.5. It is important to note that the forecast data used does not include the expected impact from any new housing.
- 4.5.6. That said, the current forecasts do not seem to take into account the falling birth rates in the area, as by 2025 school intakes will see significant decline.

## 5. Summary & Conclusions

### 5.1. Commentary & Conclusion on Education Mitigation

- 5.1.1. On the basis of the request for contributions set out at 4.1 above, and the subsequent analysis of this request, it is clear that the request for education contributions arising from the proposed development of this site would be challengeable under the CIL regulations.
- 5.1.2. At primary school level, the local schools are forecast to continue to have significant levels of surplus places, given the falling birth rates anticipated from the middle of the decade onwards.
- 5.1.3. At secondary school level, the local schools currently have a deficit of places, although a funded scheme at Glossopdale School addresses this shortfall. By 2027/28 there will be an acceptable level of surplus places to support the impact of this development.
- 5.1.4. With regard to SEND provision, DCC have requested the funding for 1 SEND place to mitigate the impact of this development. It is stated that per 100 homes, 0.7 SEND pupils are generated.
- 5.1.5. It is unclear why DCC have rounded this SEND yield to 1 place.
- 5.1.6. Further to this, the cost per place set by DCC appears to be inflated. According to the DfE Guidance appended at AYA01, it is stated that:
- “developer contributions for special or alternative school places are set at four times the cost of mainstream places, consistent with the space standards in Building Bulletin 104.”*
- 5.1.7. When taking these guidelines into consideration, for a SEND Primary school place, DCC have inflated these costs by over 28%.
- 5.1.8. It is important to consider that the forecast methodology used by the local education authority does not make an allowance for housing growth in its forecasts.
- 5.1.9. Any requests for contributions should therefore be challenged at the earliest opportunity, including dialogue with DCC.

## 6. Appendices

6.1. The following Appendices accompany this document:

- APPENDIX AYA01 - DfE Guidance on Securing Developer Contributions, November 2019;
- APPENDIX AYA02 - Site location plan;
- APPENDIX AYA03 - DfE Guidance on Home to School Transport;
- APPENDIX AYA04 - DCC Assessment of the Development Site;
- APPENDIX AYA05 - DCC Education Contribution Methodology;
- APPENDIX AYA06 - DCC & TC FOI Responses.