



# **Primary Education Impact & Mitigation Assessment®**

## **Land at Farlands, London Road, Whimple**

Client: Cranbrook LVA LLP

Report By: Oliver Nicholson, Strategy Director

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## 1. Introduction

### 1.1. Report Purpose & Scope

1.1.1.EHP Consultants has been asked to consider the proposed client development and other relevant developments for their likely impact on education places in the local area.

1.1.2.The purpose of this Assessment is to act as a point of reference to assist discussions between the client team, the relevant local education authority and the local planning authority regarding primary education matters arising as a result of the proposed Main Modifications to the Development Plan Document of the Cranbrook Plan.

### 1.2. Intended Audience

1.2.1.This Primary Education Impact & Mitigation Assessment is intended for the client team and may be shared with other parties.

### 1.3. Research Sources

1.3.1.The contents of this Primary Education Impact & Mitigation Assessment are based on publicly available information, including data from central government and any relevant local planning authorities and any relevant local education authorities.

### 1.4. Research & Analysis

1.4.1.Research for this Primary Education Impact & Mitigation Assessment was carried out in January and February 2022.

1.4.2.Research has been conducted regarding the current position within local schools, current local policy on developer contributions and an analysis of the most up to date forecasts regarding local education provision.

1.4.3.Devon County Council ('DCC') is the relevant Local Education Authority in this area and produces school forecasts as a basis on which to assess the impacts of residential development on school places.

1.4.4.Other related information for use within this Primary Education Impact & Mitigation Assessment was requested via the submission of Freedom of Information ('FOI') requests to DCC.

1.4.5.Our commentary regarding the relevance of this data and related information is also set out within this Primary Education Impact & Mitigation Assessment.

## 1.5. Community Infrastructure Levy Regulations

1.5.1.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.

1.5.2.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.

1.5.3.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 that are capable of being charged the levy.

1.5.4.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 that are better suited to use of the levy.

1.5.5.Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms. They must be:

- a) necessary to make the development acceptable in planning terms; and
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

1.5.6.The above tests are set out as statutory tests in [regulation 122](#) (as amended by the 2011 and 2019 Regulations) and as policy tests in the National Planning Policy Framework at [paragraph 57](#). These tests apply whether or not there is a levy charging schedule for the area.

1.5.7.From 1<sup>st</sup> September 2019 revised regulations came into force and these, amongst other things, introduced a requirement on CIL charging authorities to produce an annual statement regarding sums received both through CIL and planning obligations.

1.5.8.These regulations also removed the limit of pooling no more than 5 planning obligations towards one item of infrastructure, which had been a particular issue with regards to the provision of education infrastructure.

## 1.6. Department for Education Guidance on Planning Obligations

1.6.1. In April 2019 the Department for Education ('DfE') published a non-statutory guidance document titled "Securing Developer Contributions for Education". This guidance was updated by the DfE in November 2019.

1.6.2. This DfE document is non-statutory guidance for local authorities regarding seeking planning obligations towards education provision from residential development. Whilst this DfE document is non-statutory, it is important to consider elements of this guidance as they would carry some weight in a planning context.

1.6.3. The purpose of the DfE 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.

[Source: DfE Securing Developer Contributions for Education (November 2019), at Appendix EHP01]

1.6.4. However, it should be noted that nothing within this non-statutory guidance supersedes the tests set out in section 1.5 above.

1.6.5. This DfE guidance also states (with **our emphases**):

*"Identifying education projects  
19.... We advise local authorities with education responsibilities to work jointly with relevant local planning authorities as plans are prepared and planning applications determined, to ensure that all education needs are properly addressed, including temporary education needs where relevant, such as temporary school provision and any associated school transport costs before a permanent new school opens within a development site. This does not mean double funding the same school places, but allows development to be acceptable in planning terms when it is not possible to open a permanent new school at the point of need. When a permanent new school is delivered (or the relevant financial contribution is received), no further contributions to temporary provision should be required."*

(continued...)

*"29. Schools can be delivered in single or multiple phases; the best approach will depend on local circumstances and characteristics of the development. Where appropriate, for instance in the early stages of development while the need for school places is growing, developer contributions can be secured for temporary expansions to existing schools if these are required, and transport costs for pupils travelling further than the statutory walking distance. This will allow a permanent new school to be provided in a single construction phase once the development has generated sufficient pupil numbers, rather than phased construction over a longer period. While the existing pupil cohort may not switch schools initially, children living in the development will usually have priority for admission to the new school and will take up these school places over time."*

*"34. ....We advise you to respond to initial peaks in demand, such as planning for modular or temporary classrooms, securing a large enough site to meet the maximum need generated by the development. Where new settlements are planned, you may wish to carry out demographic modelling to understand education requirements in more detail, taking account of similar developments and different scenarios such as an accelerated build rate."*

[Source: DfE Securing Developer Contributions for Education (November 2019), at Appendix EHP01]

1.6.6. On this basis it is clear that current DfE guidance suggests the use of modular or temporary classrooms or temporary expansions to existing schools, when necessary, in order to ensure that the local education authority is able to meet its statutory requirements as set out in the next section of this Assessment.

## 2. Setting the Context for Local School Place Planning

### 2.1. Devon County Council's Duty to Secure Sufficient School Places

2.1.1. The site lies within the primary and secondary designated catchment areas for schools for which the local education authority is Devon County Council ('DCC').

2.1.2. 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".*

2.1.3. 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 area school for all children residing within that particular school's catchment area.

2.1.4. The Education Act simply states that the education authority must provide school education appropriate to the requirements of pupils for its area. In the case of DCC that is the area defined as the county of Devon.

2.1.5. 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.

2.1.6. 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.

### 2.2. School Organisation

2.2.1. The year of entry into primary schools is known as Year R, when children are typically 5 years of age. The year of entry into secondary schools is known as Year 7, when children are typically 11 years of age, with the exception of studio colleges or university technical colleges ('UTCs') whose year of entry is typically Year 10 when children will be 14 years old. All-through schools provide places covering both the primary and secondary phases of education, from Year R through to Year 11, or to Year 13 if the school offers sixth form places.

2.2.2. Education is compulsory for children up until the age of 16, equivalent to Year 11; hence there are 5 year groups at secondary school. The sixth form year groups are known as Years 12 and 13 respectively. Not all secondary schools offer sixth form education.

2.2.3. 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.

2.2.4. 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.

2.2.5.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.

2.2.6.As primary schools have 7 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.

2.2.7.Similarly, as secondary schools have 5 year groups, 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.

### 2.3. Walking Distance to School

2.3.1.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 Department for Education in its document “Home to school travel and transport guidance” [Appendix EHP02].

### 2.4. Patterns of Pupil Migration

2.4.1.There is likely to be movement of children between respective schools’ catchment areas, pseudo-catchment areas (based on furthest distances of places offered), designated areas, or priority areas. This movement of children due to parental preference and other factors is often referred to as “inflow” and “outflow”.

### 2.5. The Role of School Forecasts in School Place Planning

2.5.1.Each Local Education Authority ('LEA') is obliged to provide annual school forecasts to the DfE. The DfE provides detailed guidance to LEAs to help ensure that school forecasts are as accurate as possible.

2.5.2.The DfE makes the following request with regards to how LEAs treat housing developments within their forecasts:

*“Housing developments can have a big impact on the demand for places in individual planning areas, or across entire local authorities.*

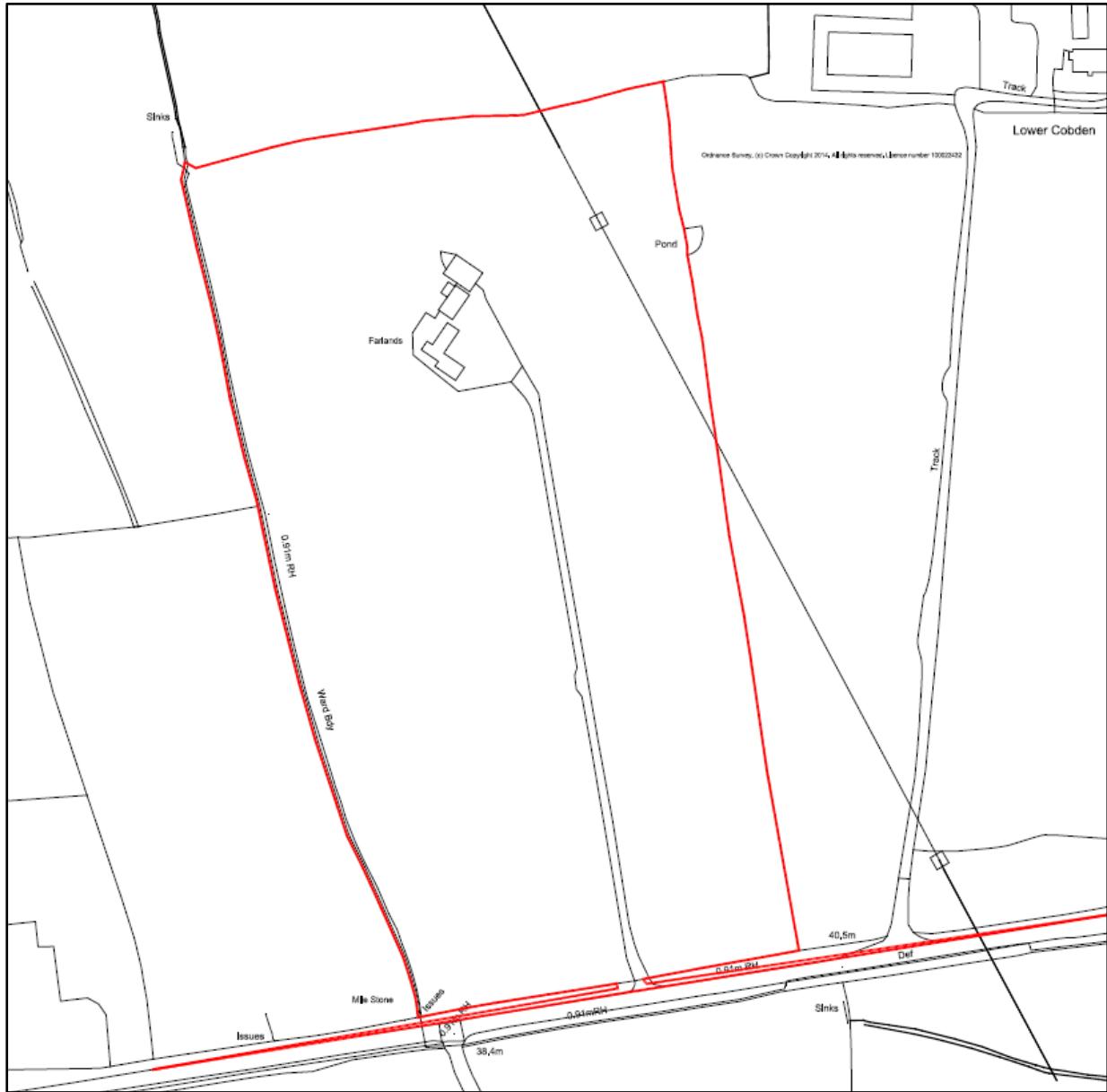
*The pupil forecasts you submit in SCAP should only include expected pupil yields from housing developments that have a high probability of being delivered within the timeframe of the forecasts. In most cases such developments will have full planning permission. If you believe a development that does not have full planning permission will proceed and will yield pupils within the forecasts timeframe, we expect that development to be present in the relevant planning authority's latest 5 year land supply. Wherever this is the case we may test the suitability of inclusion of such housing developments in SCAP forecasts by reviewing evidence on the site's deliverability and assessing delivery against previous 5 year land supply plans in the relevant planning authority.”*

[Source: DfE - School Capacity Survey Forecast Guidance (April 2021), at Appendix EHP03]

### 3. The Site

#### 3.1. Proposed Development Location

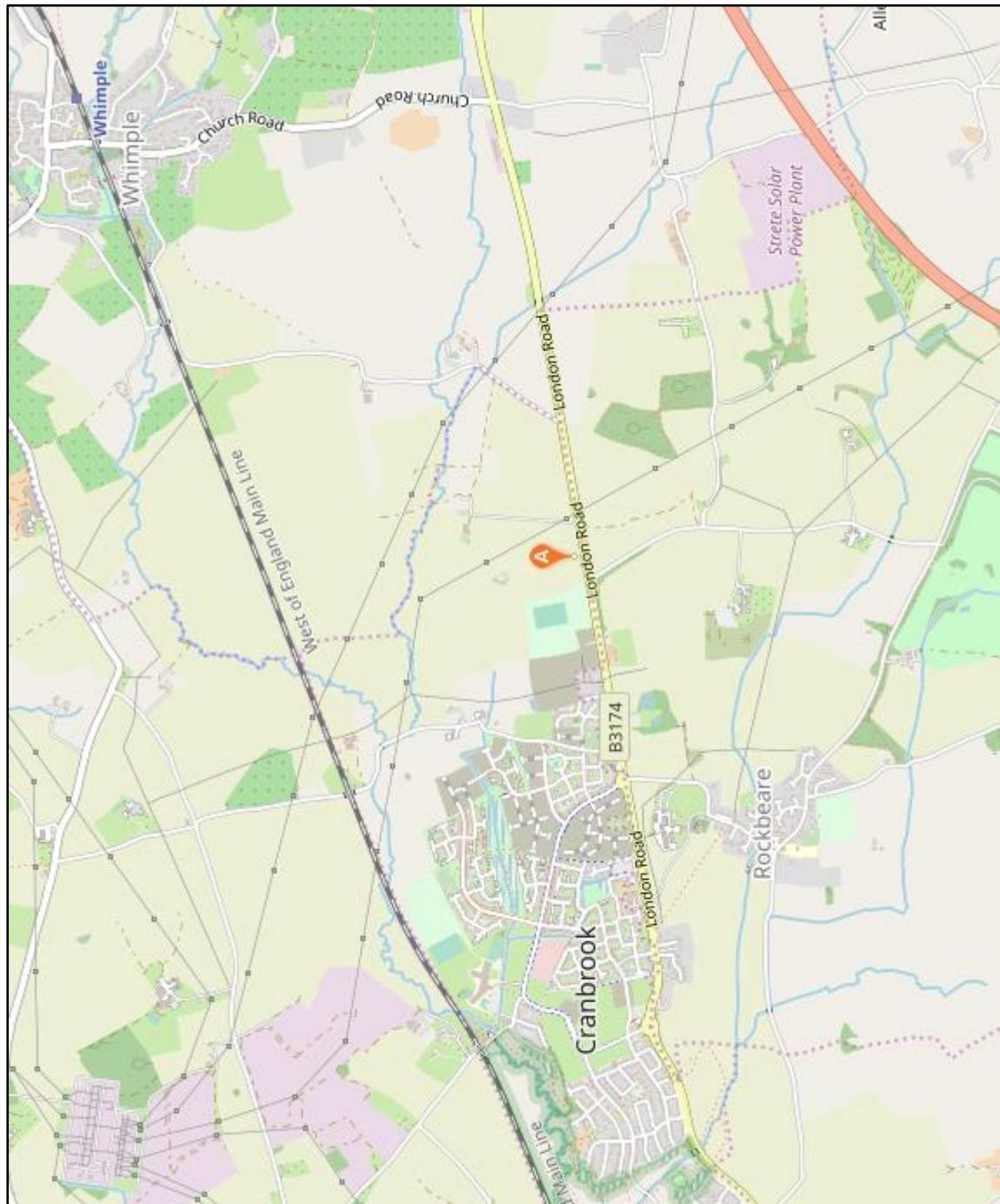
3.1.1. The proposed development site (the ‘Site’) in Whimple is located to the north of London Road as shown in the location plan extract below:



[Source: Site Location Plan extract, at Appendix EHP04]

3.1.2. The Site lies within the planning remit of East Devon District Council (‘EDDC’) and has come forward as a planning application with the reference [14/2945/MOUT](https://www.esplan.es/planning-applications/14/2945/MOUT).

3.1.3.The approximate location of the Site in relation to the wider Whimble and Cranbrook areas is shown below by the red icon:



[Source: Site Location within the wider Cranbrook area, at Appendix EHP05]

### 3.2. Dwelling Mix

3.2.1.The current indicative accommodation schedule for up to 260 dwellings, of which approximately 15% would be affordable housing, is as follows:

- 1 bed flat: 42no.
- 2 bed flat: 34no.
- 2 bed FOG: 4no.
- 2 bed house: 57no.
- 3 bed house: 73no.
- 4 bed house (2-storey): 14no.
- 4 bed house (3-storey): 36no.

### 3.3. Estimated Build Programme

3.3.1.We set out the following scenario below using the client's estimated build-rate of 50 dwellings per annum and the client's estimated site start date of 2023:

Year >	23/24	24/25	25/26	26/27	27/28	28/29	29/30
Site		50	50	50	50	50	10
Cumulative Total		50	100	150	200	250	260

[Source: Estimated build programme for the Site based on current client estimates]

### 3.4. Walking Routes from the Site Location

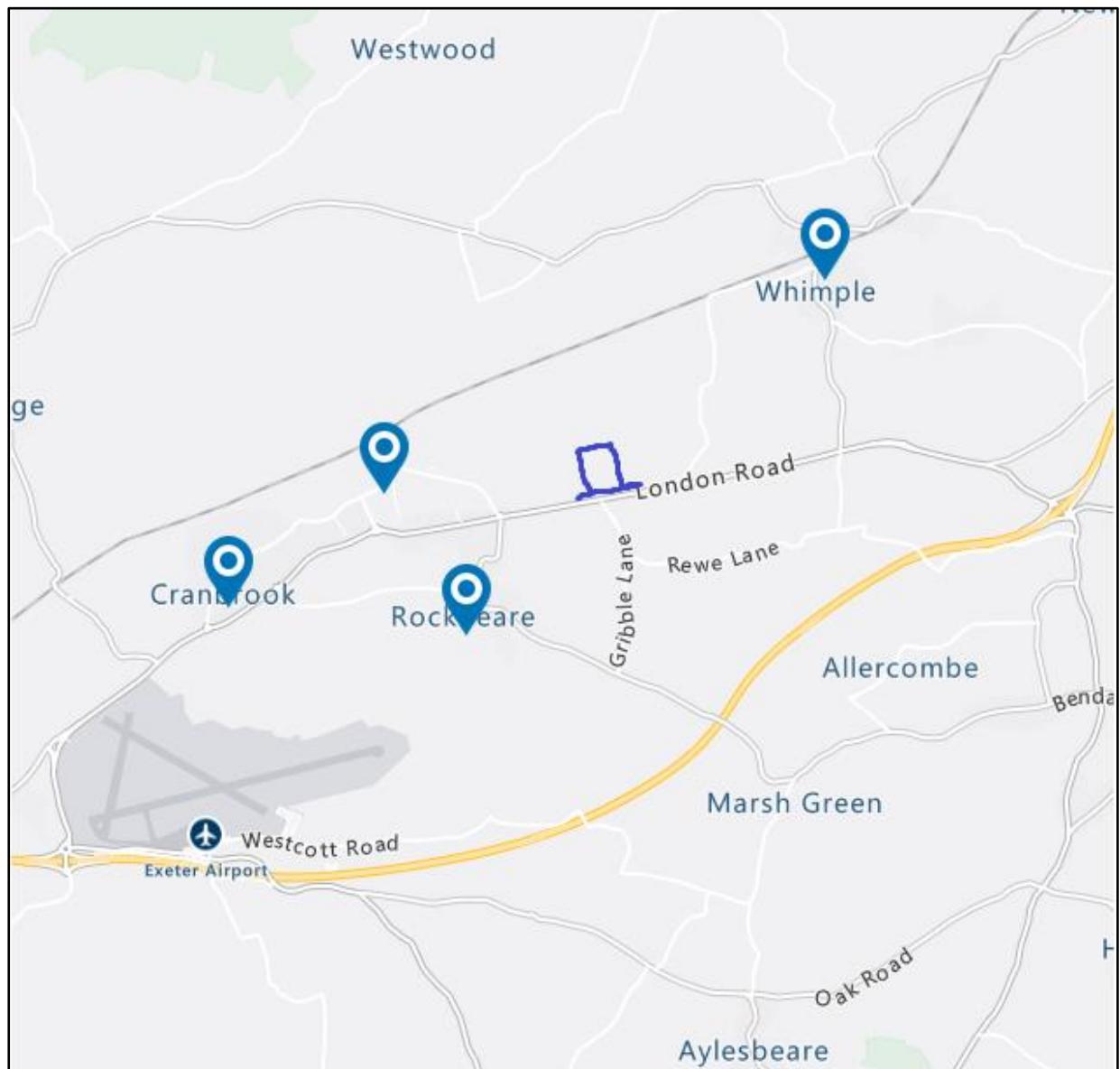
3.4.1. For the purposes of this Assessment all walking distances have been measured from the location of the Site entrance on to London Road, as follows:



## 4. The Position at Local Schools

### 4.1. Local Primary School Locations

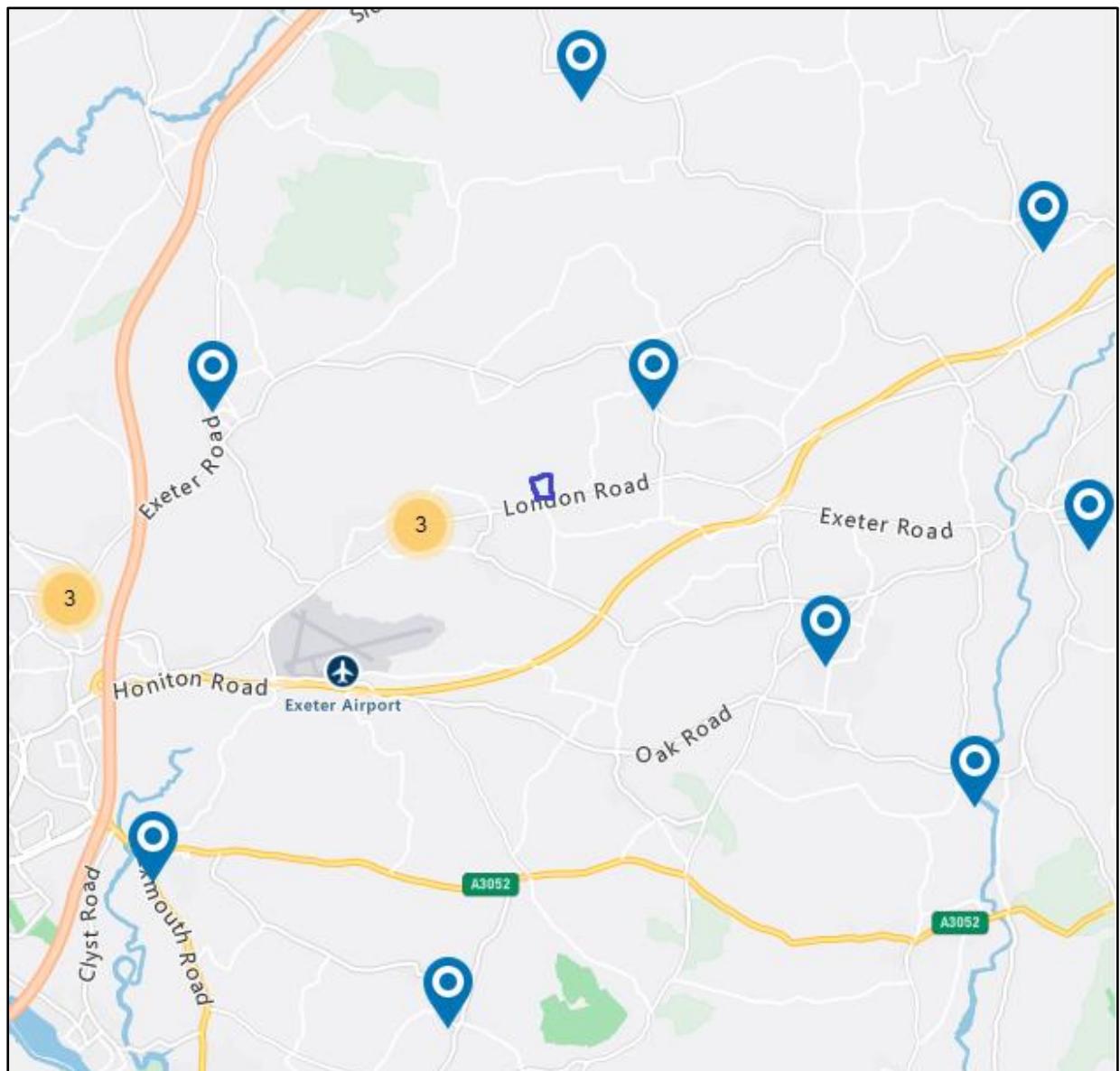
4.1.1. The broad locations of the closest local primary schools are indicated below (any blue icons indicate approximate single school locations and the blue line is an indication of the approximate location of the Site):



**Graphic:** Primary school locations relative to the Site.

[Source: DfE website]

4.1.2.The broad locations of the closest local primary schools in the wider area are indicated below (any blue icons indicate approximate single school locations, any numbered icons indicate multiple schools in a similar approximate location and the blue line is an indication of the approximate location of the Site):



**Graphic:** Primary school locations relative to the Site.

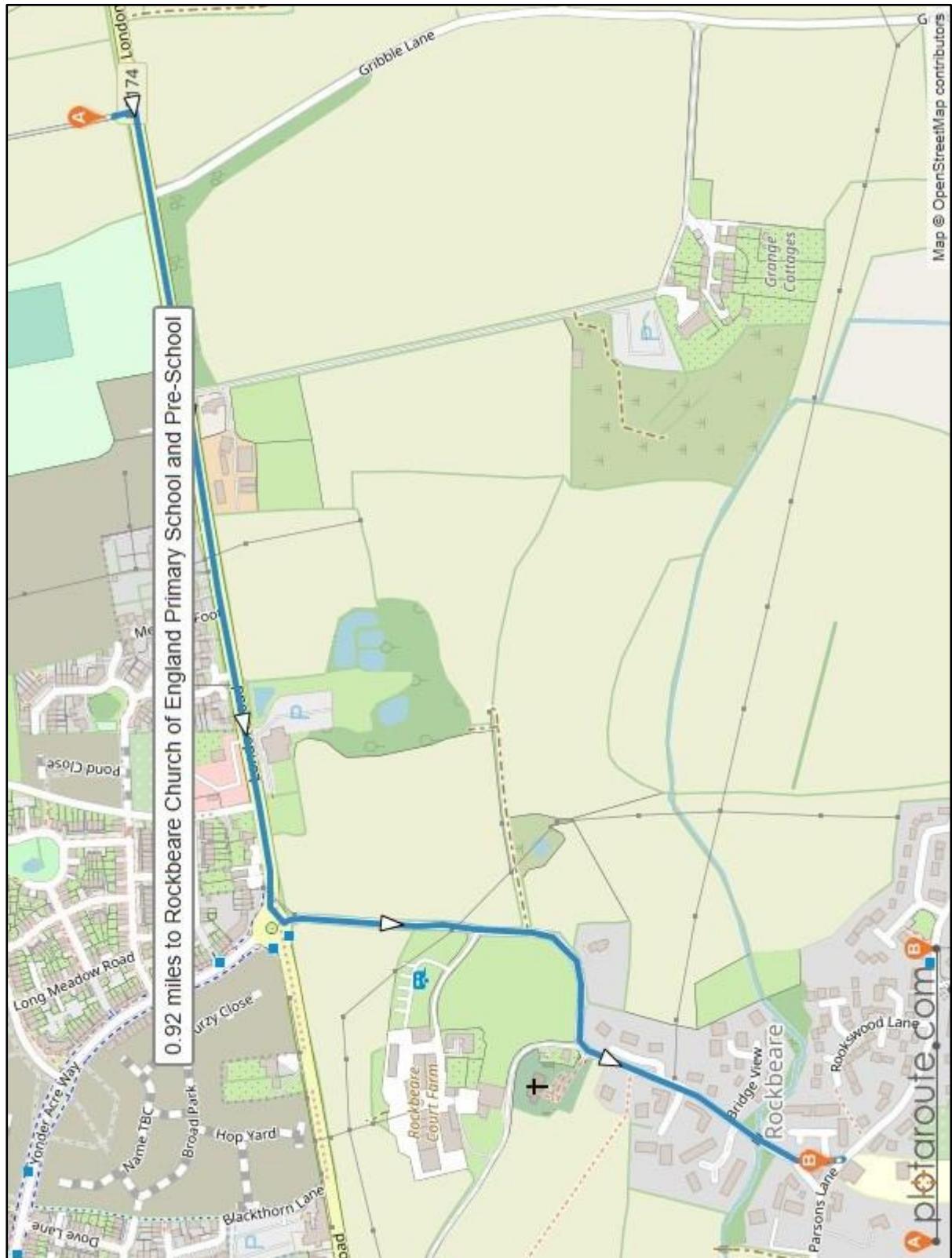
[Source: DfE website]

4.1.3.The following primary schools (including any infant, junior and all-through schools) are the nearest primary schools within 2 miles' walking distance of the Site:

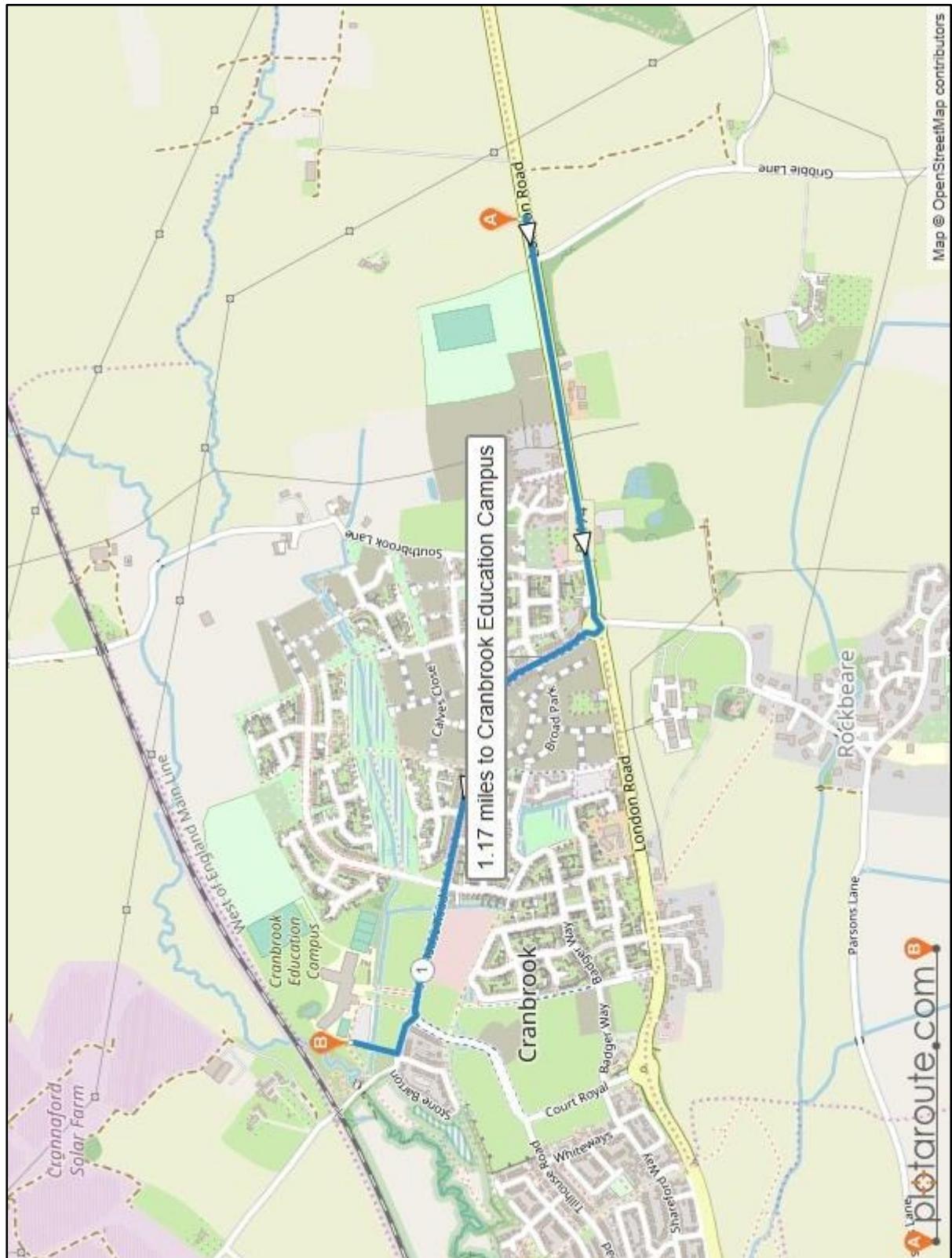
<b>Primary School</b> (including any infant and first schools)	<b>Walking Distance from the Site (miles)</b>
<b>Rockbeare CofE Primary School and Pre-School</b>	<b>0.92</b>
<b>Cranbrook Education Campus</b>	<b>1.17</b>
<b>Whimple Primary School</b>	<b>1.80</b>
<b>St Martin's CofE Primary &amp; Nursery School</b>	<b>1.93</b>

**Table:** Walking distances from the Site to primary schools in order of increasing distance. Any other primary schools are beyond 2 miles' walking distance of the Site.

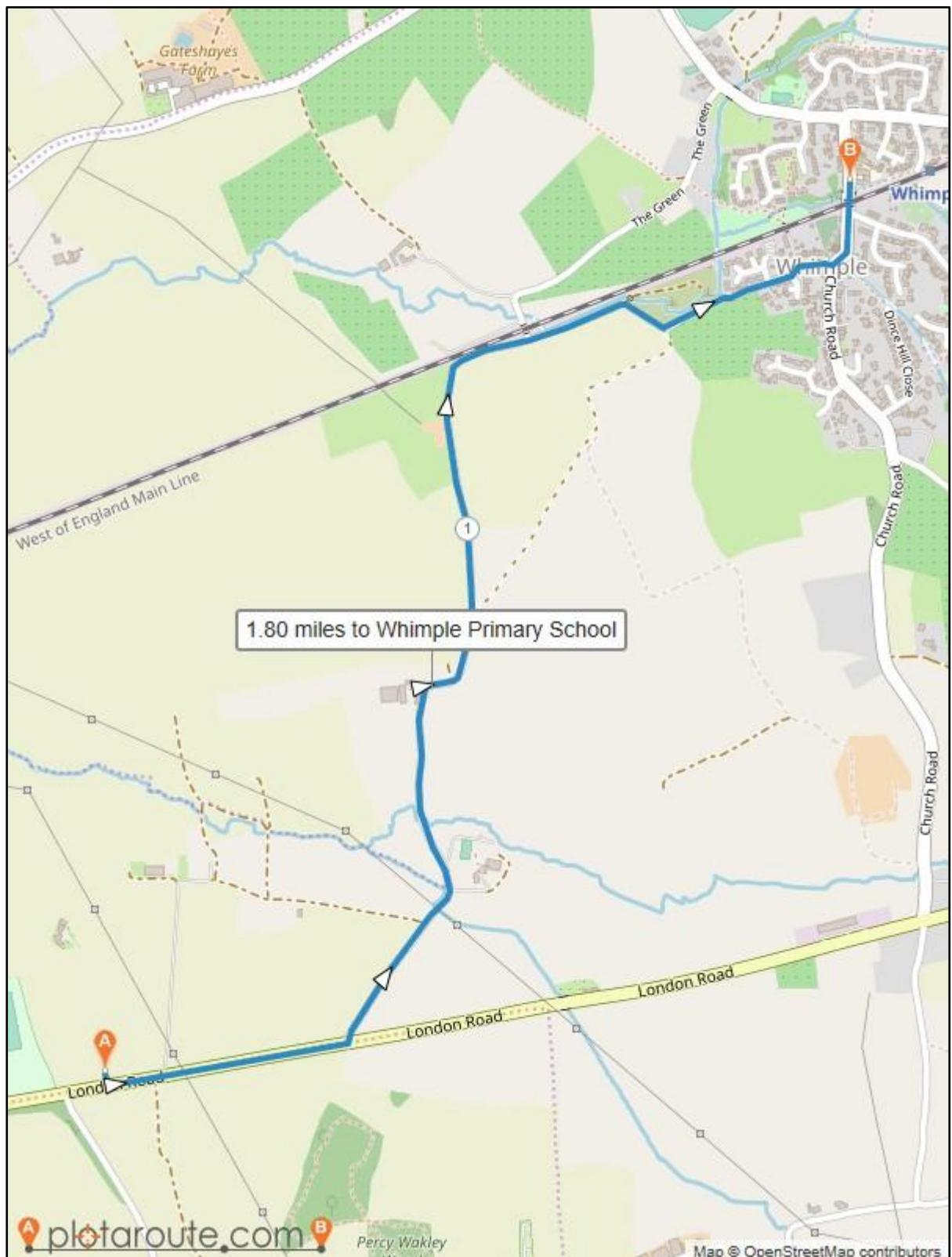
4.1.4.The following map shows a 0.92-mile walking route from the Site to Rockbeare CofE Primary School and Pre-School:



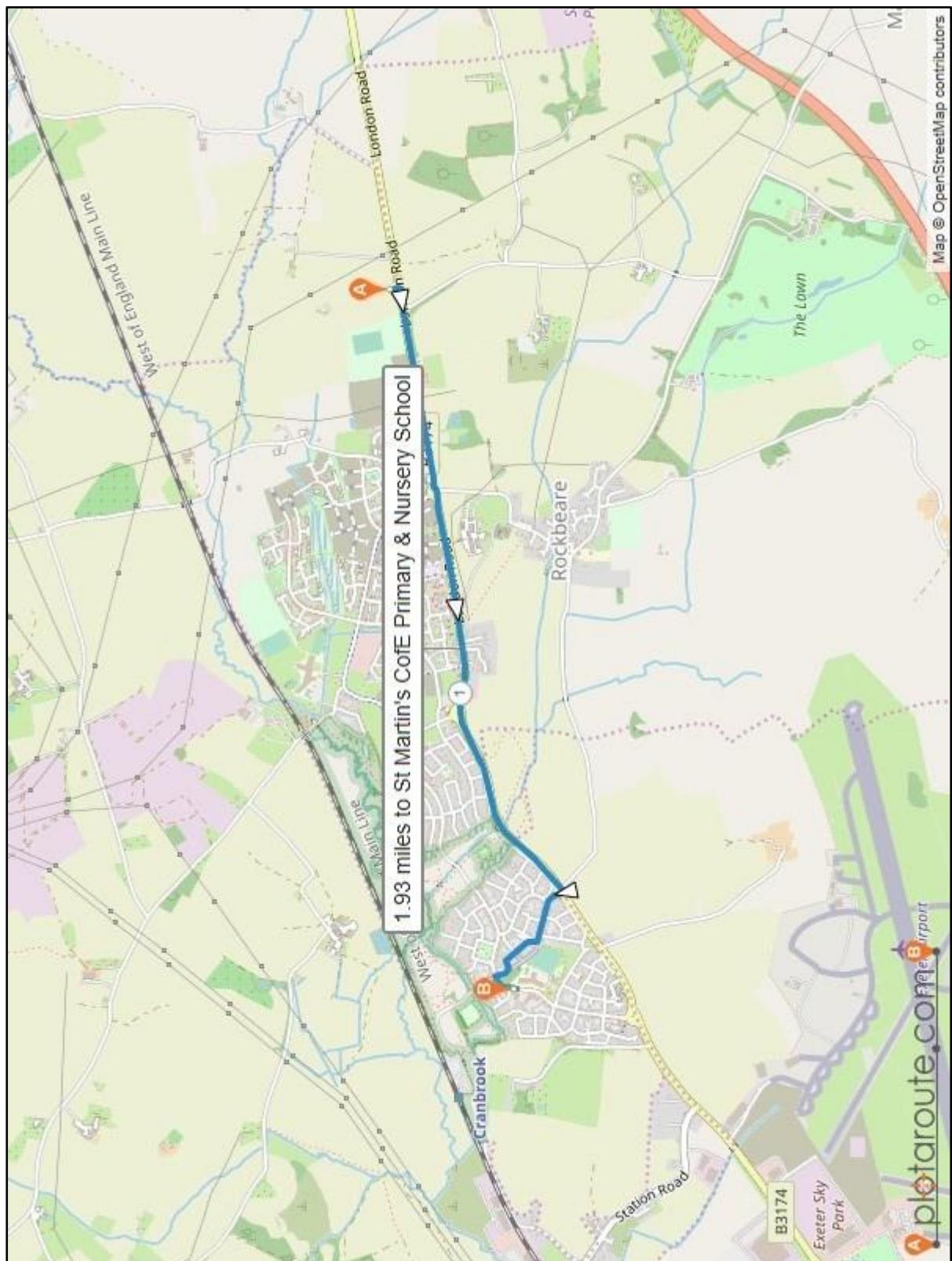
4.1.5.The following map shows a 1.17-mile walking route from the Site to the location of Cranbrook Education Campus:



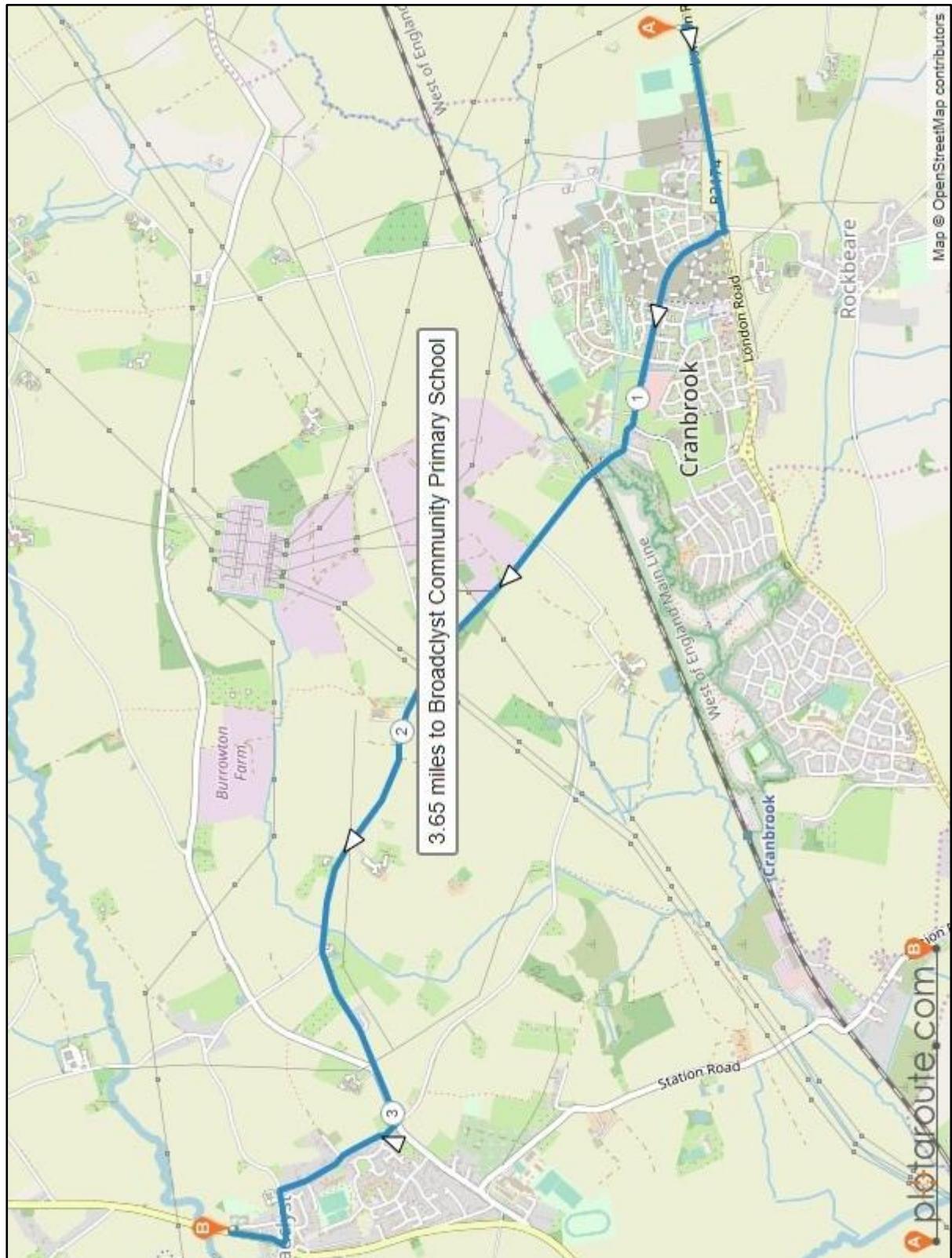
4.1.6.The following map shows a 1.80-mile walking route from the Site to the location of Whimble Primary School:



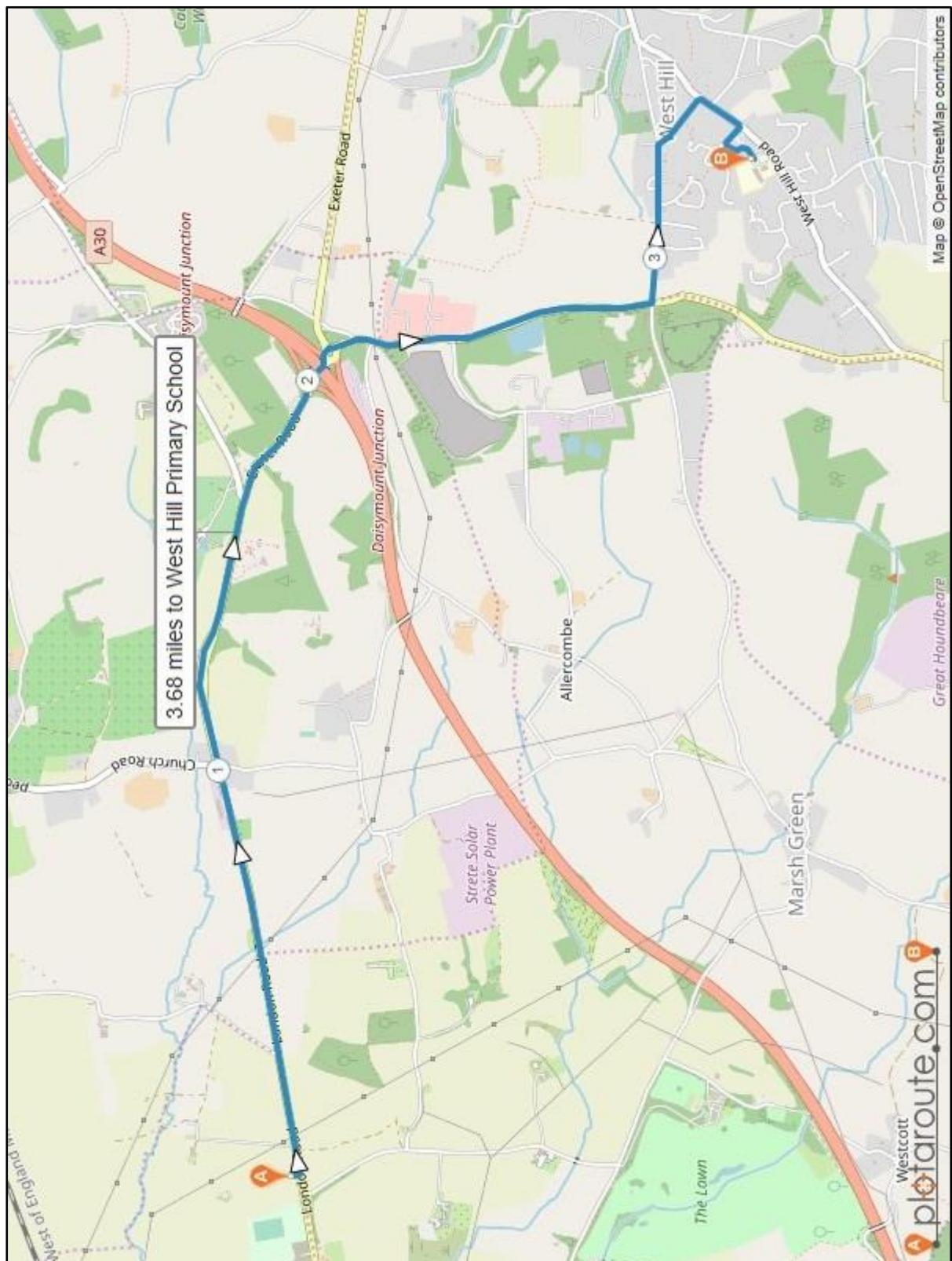
4.1.7.The following map shows a 1.93-mile walking route from the Site to the location of St Martin's CofE Primary & Nursery School:



4.1.8.The following map shows a 3.65-mile walking route from the Site to the location of Broadclyst Community Primary School:



4.1.9.The following map shows a 3.68-mile walking route from the Site to the location of West Hill Primary School:



#### 4.2. Local Primary Schools – Forecast Status of Pupil Places

4.2.1.EHP has obtained the latest primary school forecasts via the submission of FOI requests to DCC.

4.2.2.DCC prepares forecasts for each individual school. The latest DCC school forecasts were prepared in 2021. It is important to note that in 2021 DCC did not produce primary school forecasts beyond the academic year 2024/25, as at that time forecasts beyond the academic year 2024/2025 would have needed to rely on a degree of assumed birth rates rather than actual birth rates.

4.2.3.According to the latest available DCC forecasts from 2021 the forecast position of pupil places across all year groups for the 4 primary schools within a 2-mile walking distance of the Site was due to be as shown in the Table below:

School	School Capacity	Forecast Children on Roll				Forecast Surplus / Deficit Places			
		21/22	22/23	23/24	24/25	21/22	22/23	23/24	24/25
Rockbeare CofE Primary School	85	77	79	67	60	8	6	18	25
Cranbrook Education Campus (Primary Phase)	480*	426	467	516	577	54	13	-36	-97
Whimple Primary School	140	123	117	110	99	17	23	30	41
St Martin's CofE Primary	420	351	331	327	311	69	89	93	109
All 4 Primary Schools	1,125	977	994	1,020	1,047	148	131	105	78

**Tables:** Forecast position of pupil places across all year groups at the 4 primary schools which are within 2 miles' walking distance of the Site, as provided by DCC following the submission of an FOI request.

[Source: DCC school forecast data from 2021, at Appendices EHP06 to EHP09]

4.2.4.The school capacity figure in the above table for Cranbrook Education Campus (\*) includes the recent addition of permanent capacity arising as a result of 2 additional classrooms being built. Until 2019 the capacity of the primary education phase of this new all-through school was 420 places with a PAN of 60 per year group. The school has since been expanded to cater for the demand for local primary school places.

4.2.5.The Design & Access Statement for the planning application at Cranbrook Education Campus set out three potential options to expand the primary education phase of this all-through school; the chosen and implemented option being as follows:

**3.3. Option 2 - One Storey**

- 3.3.1 This option places a single storey extension at the western end of the primary wing, adding both classrooms to the ground floor.

**3.5. Conclusion**

- 3.5.1 Option 2 was preferred by the client as a better integrated approach with the main campus building and most suited to early years teaching, whilst offering future proofing potential for expansion at first floor level.

- 5.1.3 The proposed development accords with the strategic principles of Strategy 12 of the East Devon Local Plan in that it provides an expansion to an existing school to ensure that adequate educational facilities/provision can be provided to meet the needs of all age groups that will live at the new town of Cranbrook.

[Source: Design & Access Statement extracts for planning application 19/0133/FUL, at Appendix EHP10]

4.2.6.The 60 additional places created following the implementation of this proposal are currently being used in Years 1 and 2 (30 places each) in the current 2021/22 academic year.

4.2.7.According to the school's planned future admissions details there are no plans to add further permanent capacity in the short-term. The school retained its PAN of 60 places in the current academic year 2021/22 and will retain its PAN of 60 places in the next academic 2022/23:

<b>Published Admission Number</b>	<b>2021-22</b>	60 Reception
	<b>2022-23</b>	60 Reception

[Source: Cranbrook Education Campus admissions details, from the [DCC website](#)]

4.2.8.Further commentary regarding the potential for further permanent expansion of the primary education phase at Cranbrook Education Campus and the wider implications for primary school place planning in the area is set out later in this Assessment.

4.2.9. It is evident that on the basis of these current DCC primary school forecasts for these 4 schools that **there were forecast to be 148 surplus primary school places available for the current academic year 2021/22 and are forecast to be 78 surplus primary school places available for the academic year 2024/25.**

4.2.10. However, having reviewed the DCC Autumn 2021 census data for these 4 schools it is evident that these DCC forecasts have under-estimated the demand for places this academic year 2021/22.

4.2.11. According to the DCC October 2021 data the total number of pupils on roll at these 4 primary schools was **1,011**, whereas the DCC forecasts for the Spring of 2022 is a slightly lower figure of **977; hence an under-estimate of 34 places:**

Autumn 2021 School Census		Numbers on Roll by National Curriculum Year Group						
DfE code	school name	R	1	2	3	4	5	6
2004	Broadclyst Community Primary School	61	60	61	63	59	62	64
2009	Clyst St Mary Primary School	18	28	23	23	26	30	30
2056	Ottery St Mary Primary School	56	59	59	64	56	64	65
2058	West Hill Primary School	30	28	31	32	32	31	32
2067	Westclyst Community Primary School	60	60	60	62	51	60	
2074	Whimple Primary School	19	20	18	20	20	17	18
3005	St Martin's CofE Primary & Nursery School	50	54	56	52	60	59	64
3016	Payhembury Church Of England Primary School	10	15	15	15	14	17	15
3022	Silverton Church Of England Primary School	10	19	16	10	19	14	17
3024	Stoke Canon Church of England Primary School and Pre-School	7	10	10	12	17	8	16
3307	Lady Seaward's Church of England Primary School	9	14	11	12	7	13	12
3312	Feniton Church Of England Primary School	29	30	48	31	25	32	33
3317	Rockbeare Church of England Primary School and Pre-School	12	12	13	8	10	17	12
3319	Tipton St John Church Of England Primary School	10	18	6	16	9	16	16
4013	Cranbrook Education Campus	57	74	72	57	53	47	40

[Source: DCC Autumn 2021 census data, at Appendix EHP11]

4.2.12. On this basis the current demand for local primary school places is greater than that predicted by DCC as recently as the summer of 2021 when these latest forecasts were produced.

4.2.13. According to the latest available DCC forecasts from 2021 the forecast position of pupil places in Year R only for the 4 primary schools within a 2-mile walking distance of the Site was due to be as shown in the Table below:

School	School Capacity (Year R)	Forecast Year R Children on Roll				Forecast Year R Surplus / Deficit Places			
		21/22	22/23	23/24	24/25	21/22	22/23	23/24	24/25
Rockbeare CofE Primary School	12	9	12	4	4	3	0	8	8
Cranbrook Education Campus (Primary Phase)	60	70	84	94	120	-10	-24	-34	-60
Whimple Primary School	20	15	14	8	10	5	6	12	10
St Martin's CofE Primary	60	44	42	49	36	16	18	11	24
All 4 Primary Schools	152	138	152	155	170	14	0	-3	-18

**Tables:** Forecast position of pupil places in Year R only at the 4 primary schools which are within 2 miles' walking distance of the Site, as provided by DCC following the submission of an FOI request.

[Source: DCC school forecast data from 2021, at Appendices EHP06 to EHP09]

4.2.14. It is evident that on the basis of these current DCC primary school forecasts for these 4 schools that **there are forecast to be a deficit of 18 primary school places in Year R by the academic year 2024/25.**

4.2.15. Having reviewed the DCC Autumn 2021 census data for these 4 schools it is evident that these DCC forecasts for Year R have proved broadly accurate in estimating the demand for Year R places this academic year 2021/22; albeit the census date was October 2021 and the DCC forecasts are for the Spring of 2022 so there may be additional Year R pupils who will join over this 6-month period.

4.2.16. According to the DCC October 2021 data the total number of Year R pupils on roll at these 4 primary schools was **138**, the same as the figure shown in the DCC forecasts for the Spring of 2022.

4.2.17. This indicates that the under-estimate of 34 places in the DCC forecasts set out earlier in this Assessment occurs only in Years 1 to 6 at these primary schools, not in Year R.

4.2.18. Further commentary regarding the accuracy of current DCC forecasts and the wider implications for primary school place planning in the area is set out later in this Assessment.

4.2.19. It is important to emphasise the approach taken by DCC with regards to its school forecasts and the extent to which these forecasts rely upon data from local planning authorities. The current DCC Education Infrastructure Plan (revised) states as follows (with **our emphasises**):

*"Longer Term Planning ...*

*3.12 We use a demographic modelling tool which estimates future population change based on fertility, mortality and migration assumptions, using historical data to define these assumptions, integrating official forecasts as appropriate. Population forecasts can be used to derive likely household and housing profiles consistent with the population's age-sex composition. For the purposes of assessing future pupil numbers, **the model assumes that the scale and pattern of new housing development will reflect the proposals and policies set out in the relevant adopted Local Plan...***

*3.14 The conclusions reached for medium and longer term education provision will also be used to inform short term planning decision-making. For example in assessing whether to bring in new permanent provision, temporary capacity or to look to use existing provision in response to short term local pressures on school capacity."*

[Source: DCC Education Infrastructure Plan (revised) pages 22 and 23, at Appendix EHP12]

4.2.20. On the basis of the above approach in our opinion the DCC forecasts for the 4 primary schools shown earlier in this Assessment incorporate the impact of the following number of annual dwelling completions in the Cranbrook expansion area:

Period	West End Completions	Rest of East Devon Completions	West End Projections	Cranbrook expansion zones projections	Rest of East Devon Projections	Axminster Masterplan projections	Additional Windfalls	Total Comp/Pro
13/14	486	344						830
14/15	531	498						1,029
15/16	403	624						1,027
16/17	335	389						724
17/18	326	540						866
18/19	392	537						929
19/20	560	505						1,065
20/21			422	0	886	0	0	1,308
21/22			472	0	617	12	0	1,101
22/23			431	90	299	25	123	968
23/24			457	292	362	72	72	1,255
24/25			531	375	139	72	181	1,298
25/26			164	537	150	72	181	1,104
26/27			150	591	88	72	181	1,082
27/28			150	562	100	75	181	1,068
28/29			150	547	57	114	181	1,049
29/30			104	457	50	112	181	904
30/31			100	377	38	112	181	808

[Source: Cranbrook reserved matters sites & housing projections analyses page 23, from the [EDDC Housing Monitoring Update](#), at Appendix EHP13]

- 4.2.21. The Cranbrook Expansion projections cited in the above table are taken from the [EDDC Housing Monitoring Update](#) which was published in October 2020. Until February 2022 EDDC had not published any further housing projections figures since October 2020, possibly as a result of the impacts of Covid-19.
- 4.2.22. EDDC has since provided a new monitoring report in February 2022. This now presents DCC with the opportunity of updating its school forecasts to reflect these latest housing projections and help inform decision-making moving forward.
- 4.2.23. It is evident from the Appendix to the October 2020 [Housing Monitoring Update](#) that EDDC were anticipating that the combined number of dwellings cited in the above table would come forward on each of the 4 Cranbrook expansion areas between 2022/23 and 2030/31 (Bluehayes, Treasbeare, Grange and Cobdens) [source: EDDC Housing Monitoring Update, March 2020, Appendix extracts, at Appendix EHP14].
- 4.2.24. During 2022/23 and 2023/24 EDDC were predicting that a total of 382 dwellings will be completed in the 4 Cranbrook expansion areas. However, none of these 4 areas has been approved for development at the present time and so in our opinion it is now necessary for EDDC to provide a more recent Housing Monitoring Update in order that DCC can prepare more reliable school forecasts and help inform the Inspector regarding the likely timing of any additional primary school provision in the area.
- 4.2.25. Given our observations above and the likelihood that these 382 dwellings will not be built 2022/23 and 2023/24 it is possible to provide an alternative primary school forecast scenario for the area relevant to the 4 local primary schools cited earlier in this Assessment.
- 4.2.26. DCC uses a figure 0.25 primary schoolchild places per eligible dwelling in order to gauge the demand for primary school places. It follows that removing 382 dwellings from the school forecast over this period would result in a decrease in demand by a factor of 96 primary school places during 2022/23 and 2023/24 [*calculation: 382 x 0.25 = 96 primary school places*].
- 4.2.27. On this basis, given that DCC currently forecasts a surplus of 78 primary school places in the area by 2024/25, the revised forecast based on this adjustment of an additional 96 places could be **174 surplus primary school places by 2024/25** [*calculation: 78 + 96 = 174 primary school places*].
- 4.2.28. If, however, the current DCC local primary school forecasts do not yet include these projected 382 dwellings from the 4 Cranbrook expansion areas and only include the 281 dwellings that EDDC predict will be completed on the ongoing Cranbrook 03/P1900 development by 2022/23 (with no additional dwelling completions at Cranbrook 03/P1900 thereafter), then in our opinion it will be necessary for DCC to set out the basis for the decrease in surplus primary school places from 131 in 2022/23 to 78 in 2024/25 as there is currently no evidence to suggest that this decrease would occur.
- 4.2.29. Further commentary regarding this adjusted forecast scenario and the wider implications for primary school place planning in the area is set out later in this Assessment.

## 5. Primary Education Impact & Mitigation

### 5.1. DCC's Consultation Response regarding the Site

5.1.1. The latest DCC consultation response included the following comments with specific regard to the Site and primary education:

Devon County Council is the Local Education Authority and therefore has a statutory duty to ensure that all children have a school place which they can attend. The manner in which the county council undertakes school place planning is set out in our Education Infrastructure Plan<sup>4</sup>.

In accordance with the above, the county council position is that new education facilities required to serve development should be funded by that development through fair and proportionate contributions. Devon County Council uses a standardised approach to securing developers contributions for education provision, detailed in its Education Section 106 Infrastructure Approach<sup>5</sup>. This methodology satisfies the tests as prescribed in the CIL Regulations 2010 and has been endorsed through Devon County Council's Development Management Committee.

#### Primary School Provision

In accordance with its education s106 policy, the county council has reviewed the capacity available at the existing primary schools within the locality of the application site – this includes schools within an area of 1.5 miles from the site. For clarity, this assessment of capacity takes into account other permitted developments which are predicted to also generate pupils likely to use these schools and the mitigation that these have contributed towards. Whilst these developments may not physically be built yet, there is reasonable certainty to assume that they will be and this is why they have to be factored in.

At primary level, there are three schools that could support the development, Rockbeare Primary which is nearing capacity with only an estimated 10 spare places forecasted. The other schools are in Cranbrook, specifically St Martin's C of E Primary and the new Cranbrook Education Campus all-through school, both having been built specifically to mitigate the impact the approved development in Cranbrook up to 3,500 dwellings. Therefore contributions are requested to support additional primary capacity which is likely to be delivered within Cranbrook due to the site constraints at Rockbeare Primary school. Schools at Cranbrook are within the county council's recommended distances for walking as set out in the county council's policy for securing education infrastructure contributions.

[Source: DCC - Consultation response including education (May 2016) page 6, at Appendix EHP15]

5.1.2.The same DCC consultation response also goes on to state:

### Section 106 Education contributions

#### Infrastructure

As highlighted above, the council has a standardised approach to securing developer section 106 contributions which factors in the following information:

- Capacity of school as based on the standard net capacity calculation
- Number of pupils attending the school
- Agreed but unimplemented development
- The number of eligible dwellings being proposed.

These factors are used to assess the impact of development by applying government published costs relating to the provision of school infrastructure. The costs for school extension have been used in the calculation below, rather than the cost for constructing a new school (which are higher).

Applying the factors identified in the section 106 methodology, the costs applied to each eligible dwelling are calculated as follows:

School Phase	Cost per Pupil – Infrastructure a*	Cost per pupil – ICT b*	Pupils Generated by each Eligible Dwelling c**	Cost per Eligible Dwelling (a+b)*c
Primary	£11,074	£287	0.25	£2,840
Secondary	£16,791	£1,450	0.15	£2,736

\* see page 4 of Devon County Council Education Section 106 Infrastructure Approach

\*\*see page 3 of Devon County Council Education Section 106 Infrastructure Approach

#### Primary School Land

Due to the constrained nature of the existing primary school, DCC is seeking contributions towards additional primary school land to support the proposed development. Land would also be required if expanding one of the primary schools at Cranbrook. In calculating this additional land, the council has applied the following methodology:

A 420 place school requires approximately 1.7ha (17,000m<sup>2</sup>) as set out in Building Bulletin Guidance 103<sup>6</sup>. Each pupil requires the equivalent of 40m<sup>2</sup> (17,000/420)

Therefore each eligible dwelling (which generates 0.25 primary pupils) needs to provide the equivalent of 10m<sup>2</sup> (40 x 0.25)

The valuation of land is based upon a multiple of agricultural land value and estimated at £200,000 per hectare (this is 10x the agricultural land value set out in East Devon's CIL viability study p23<sup>7</sup>).

[Source: DCC - Consultation response including education (May 2016) page 7, at Appendix EHP15]

5.1.3.According to DCC “Eligible Dwellings” are those with 2 or more bedrooms [source: DCC - Education Approach for Developer Contributions page 3, at Appendix EHP16].

5.1.4.On the basis that the Site is likely to contain 42 1-bed dwellings, DCC would calculate that the Site of 218 remaining eligible dwellings [*calculation: 260 dwellings – 42 1-bed dwellings = 218 eligible dwellings*] would give rise to a **requirement for 55 primary pupil places** [*calculation: 218 eligible dwellings x 0.25 pupils per eligible dwelling = 55 primary pupil places*].

5.1.5.It is important to emphasise that DCC has since updated its education infrastructure costs as follows:

*"In accordance with government guidance, the county council will request contributions from developers based upon the latest DfE school place scorecards. The latest scorecard currently available is for 2019 (published 25th June 2020)..."*

*Updated costs based on the scorecards will be published on the Devon County Council – Pupil Place Planning website. The scorecards relate to mainstream primary and secondary school places. The costs are taken from the national scorecards due to a larger sample size and greater certainty that all types of school place will be included. In line with the guidance, national averages have been adjusted using BCIS locational factors in order to reflect regional variances. The new build or school expansion rate per pupil will be applied to each pupil for whom new capacity will need to be secured..."*

*Informed by the approaches set out above, the cost of pupil places is set out below:*

<i>Education infrastructure</i>	<i>Cost per place</i>
<i>Primary New Build</i>	<i>£20,305</i>
<i>Primary Extension</i>	<i>£17,097"</i>

[Source: DCC - Education Approach for Developer Contributions pages 6 and 7, at Appendix EHP16]

5.1.6.The current approach regarding the cost of land acquisition for new schools is stated by DCC as follows:

*"In some cases, Devon County Council may purchase a school site in advance of development coming forward. This however will be on the basis that all future development makes a contribution to reimburse the Education Authority proportional to the size of development and the cost of land."*

[Source: DCC - Education Approach for Developer Contributions page 17, at Appendix EHP16]

5.1.7.It is evident that according to the DCC consultation response and the current DCC Education Approach for Developer Contributions DCC would accept proportionate S106 contributions towards the creation of additional primary school places either on a new school site or "*if expanding one of the primary schools at Cranbrook*". These contributions would cover the costs of any necessary land required for these places to be created and the associated build costs to create an additional 55 primary school places.

## 5.2. DCC's Comments on the Cranbrook Infrastructure Delivery Plan

5.2.1. On 5<sup>th</sup> February 2020 DCC provided comments on the Cranbrook Infrastructure Delivery Plan with specific regard to primary education. This section sets out aspects of these DCC comments and our related analyses and observations.

5.2.2. Within these written representations DCC provided its “Appendix 2: Cranbrook Education Capacity Assessment”, stating as follows (with **our emphases**):

*“Based on school census information October 2019, there are currently **828 primary aged students** living in the primary catchment area for the two schools in Cranbrook against a published primary capacity of 840...”*

*“Devon understands there are circa **2,000 homes** of the 3,500 homes are now built...”*

*“Based on the numbers above and circa 2,000 occupations, **the actual pupil yield is: Primary – 828/2,000 = 0.41”***

[Source: DCC - Position Statement - Additional information on Cranbrook Infrastructure Delivery Plan - Appendix 2: Cranbrook Education Capacity Assessment page 1, at Appendix EHP17]

5.2.3. If this analysis is based on all 828 pupils living within these 2,000 new dwellings then the child yield figure ratio of **0.41** shown above would differ very considerably from the current DCC methodology of **0.25** primary pupils per eligible dwelling.

5.2.4. It must be emphasised that DCC did not provide the data to support the assertion that all 828 pupils were indeed living within these 2,000 new dwellings and not elsewhere.

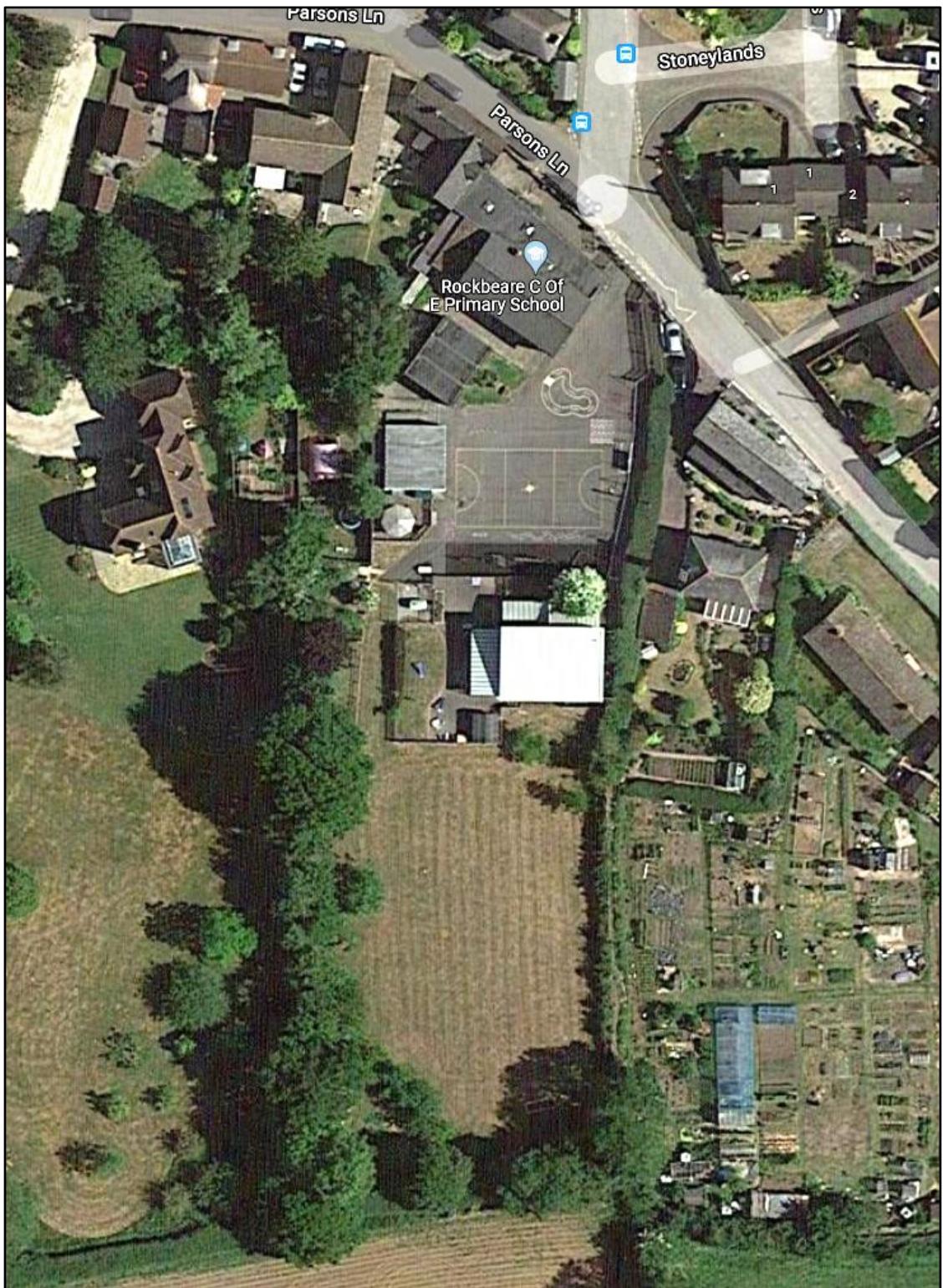
5.2.5. Nonetheless, it could indeed be the case that the future demand for primary school places in the Cranbrook area will exceed the current DCC forecasts given our analysis of the under-estimate in these DCC forecasts in the short-term versus the actual demand this academic year 2021/22, as set out earlier in this Assessment.

5.2.6. Within these written representations on the Cranbrook Infrastructure Delivery Plan DCC also stated as follows (with **our emphases**):

*“Rockbeare C of E Primary – the school is an academy and upon conversion has a net capacity of 84 but has historically offered 15 places per year but does not have the accommodation to support this offer. There are currently 87 children on roll and it is projected that the school will remain at capacity due to growth in Cranbrook. **The school occupies a constrained site with limited options for expansion.***

*“Whimble Primary – the school is a maintained community school with a net/maximum capacity of 139. There are currently 142 children on roll and it is projected that the school will remain at capacity due to growth in Cranbrook. **The school occupies a constrained site with limited options for expansion.”***

5.2.7.The following satellite image shows the location of Rockbeare CofE Primary School and we concur with DCC's comment regarding the school site. The school occupies a constrained site and has limited options for permanent expansion or the temporary location of modular classrooms:



5.2.8.The following satellite image shows the location of Whimble Primary School and we concur with DCC's comment regarding the school site. The school occupies a constrained site and has limited options for permanent expansion or the temporary location of modular classrooms:



5.2.9. With regards to DCC's comment that it is "*projected that the school will remain at capacity due to growth in Cranbrook*" we make the following observations. The latest DCC forecasts from 2021, which were created more than one year after these DCC's written representations, show that the number on roll at the school is predicted to reduce from **147** in the Spring of 2019 to only **99 pupils by the Spring of 2025** [source: DCC School Forecast - Whimble Primary School, at Appendix EHP08].

5.2.10. As set out earlier in this Assessment, according to the DCC methodology this forecast includes the housing projections for the Cranbrook area. Whimble Primary School is 1.80 miles' walking distance from the Site and hence well within the DfE's maximum reasonable statutory walking distance to primary school. However, new housing in Cranbrook which is more than 0.2 miles west of the Site is likely to be beyond 2 miles' walking distance from the school. On this basis, in our opinion, the Site is a development which could provide demand for pupil places such that Whimble Primary School will indeed remain at capacity in accordance with DCC's comment. Further commentary regarding this matter is set out later in this Assessment.

5.2.11. Within these written representations on the Cranbrook Infrastructure Delivery Plan DCC also stated as follows (with **our emphases**):

*"The Cranbrook School Capacity Assessment contained in Appendix 2 of this document demonstrates that existing schools at Cranbrook and nearby will not have capacity to service the expansion area development. In addition, letters from the Ted Wragg Trust and the Diocese of Exeter in Appendices 3 and 4 state that they cannot accommodate additional pupil numbers at their school sites on a temporary or permanent basis."*

[Source: DCC - Position Statement - Additional information on Cranbrook Infrastructure Delivery Plan - page 8, at Appendix EHP17]

5.2.12. The latter part of the above statement differs very significantly from the position that DCC set out 1 month earlier on 8<sup>th</sup> January 2020 regarding Matter 9: Infrastructure Delivery within its written representations during the Cranbrook Plan 2013-2031 Examination (with our emphasis):

**5. Q133: How will the increased demand for school places arising from the development be accommodated prior to the completion of the new school? How will this impact on surrounding schools (particularly Whimple Primary School)?**

- 5.1.1. The trigger for the new primary school is very early on within the development phasing and therefore only a small number of additional pupils will be generated from the development before the school opens.
- 5.1.2. There will be an opportunity to provide temporary accommodation in advance of the permanent new school buildings opening and this is an approach which has been followed recently at a number of new primary school across the county, including Monkerton (in Exeter) and Kingsteignton. This approach can be followed when there is certainty that the new school will open within a reasonable timeframe. There is extensive land available at the Cranbrook Education Campus and as such there is potential that such a solution could be provided there.

[Source: DCC - Position Statement - Matter 9: Infrastructure Delivery - Cranbrook Plan 2013-2031 Examination page 4, at Appendix EHP18]

5.2.13. Having reviewed the letters at Appendices 3 and 4 of the DCC written representations on the Cranbrook Infrastructure Delivery Plan DCC we make the following observations.

5.2.14. The following satellite image shows the location of St Martin's CofE Primary School and we concur with the Diocese's letter regarding the school site. The school has limited options for permanent expansion or the temporary location of modular classrooms:



5.2.15. Cranbrook Education Campus is operated by the Ted Wragg Multi-Academy Trust. DCC is the owner of the land on which Cranbrook Education Campus is located, as indicated by the S106 Agreement extract from the details of [planning applications 03/P1900](#):

**2.9 The Owners shall Offer to Transfer the Education Campus Land to DCC in the form of the Education Campus Transfer prior to the issue of the Certificate of Practical Completion for the Education Campus**

5.2.16. On this basis, whilst the Ted Wragg Multi-Academy Trust would be consulted, it would be for DCC to assess whether modular or temporary classrooms could be located on land at Cranbrook Education Campus, as indicated in the DCC Position Statement cited earlier *"There is extensive land available at the Cranbrook Education Campus and as such there is potential that such a solution could be provided there."*

5.2.17. Moreover, if the Ted Wragg Multi-Academy Trust were to object to modular or temporary classrooms being located on land at Cranbrook Education Campus, any such objection would not trump the need for DCC to meet its statutory duty to secure sufficient school places.

5.2.18. Furthermore, in our opinion, whilst DCC states that the letter from the Ted Wragg Multi-Academy Trust states *"that they cannot accommodate additional pupil numbers at their school sites on a temporary or permanent basis"*, this statement is incorrect.

5.2.19. The letter from the Ted Wragg Multi-Academy Trust does not state that modular or temporary classrooms cannot be located on land at Cranbrook Education Campus; the letter solely refers to using the existing school buildings to provide additional primary school places or adding further permanent primary school capacity.

5.2.20. Furthermore, the letter from the Ted Wragg Multi-Academy Trust appears to wholly contradict the details regarding the recent ground floor expansion option at the school which was chosen to enable potential further expansion at first floor level, as set out earlier in this Assessment. The Design & Access Statement for the planning application at Cranbrook Education Campus stated as follows:

### 3.3. Option 2 - One Storey

3.3.1 This option places a single storey extension at the western end of the primary wing, adding both classrooms to the ground floor.

### 3.5. Conclusion

3.5.1 Option 2 was preferred by the client as a better integrated approach with the main campus building and most suited to early years teaching, whilst offering future proofing potential for expansion at first floor level.

[Source: Design & Access Statement extracts for planning application 19/0133/FUL, at Appendix EHP10]

5.2.21. On this basis it is very surprising that the Ted Wragg Multi-Academy Trust adopted this stance in February 2020 when as recently as 2019 the ground floor expansion option was chosen in order to facilitate a potential further expansion of the primary school at first floor level.

5.2.22. On this basis in our opinion **DCC has not set out robust evidence that temporary primary school capacity or additional permanent primary school capacity cannot be provided on land at Cranbrook Education Campus.**

5.2.23. Furthermore, in our opinion DCC's comments regarding the option for the provision of additional primary school places in temporary accommodation do not go far enough to set out the potential options available to DCC. In our opinion, the "*opportunity*" of providing temporary accommodation does not require certainty of the date when the new school would open.

5.2.24. DCC are capable of providing temporary accommodation even if the date when the new school would open is not yet known. In fact, in order to meet its statutory duty as set out earlier in this Assessment, DCC may have no choice but to take this option if a new school does not open in permanent accommodation in the foreseeable future.

5.2.25. Regarding the option to provide primary education places within modular or temporary classrooms, the client has made us aware of the following comments from the client's planning consultant to EDDC dated 12<sup>th</sup> November 2021:

*"During the course of the examination, it has also been suggested that DCC will not accept such a solution because the use of temporary classrooms for any more than a couple of terms is harmful to the quality of education that can be delivered to children."*

5.2.26. In the event that DCC has indeed gone on record stating that "*the use of temporary classrooms for any more than a couple of terms is harmful to the quality of education that can be delivered to children*" then **we would strongly disagree with this assertion on the basis of the following detailed evidence.**

5.2.27. **Firstly**, DCC would clearly not be following the current DfE guidance regarding the valid use of modular or temporary classrooms, as set out earlier in this Assessment.

5.2.28. **Secondly**, DCC would not be giving due regard to the success in the use of temporary classrooms in other local education authorities. There is a relevant example elsewhere where the local education authority and local planning authority both agreed to the provision of primary school capacity in modular classrooms when additional local places were required and the date when permanent primary school capacity would be created was not yet known.

5.2.29. Reading Borough Council (a unitary authority) gave approval for The Heights Primary School to open in September 2014 in modular classrooms on a temporary site as a permanent site for a permanent new primary school was not yet confirmed or available.

5.2.30. The new, permanent 2FE school was eventually opened on another site in September 2021, 7 years later:

*"The Heights Primary is Caversham's newest school, which opened its doors in September 2014 on a temporary site in Lower Caversham and relocated to a permanent site in Caversham Heights, during the Summer of 2021."*

[Source: The Heights Primary School [website](#)]

5.2.31. The background planning details regarding The Heights Primary School show that the school grew to be a 2FE school in modular classrooms over a 7-year period before relocating to its new, permanent buildings on a new site [sources: Design & Access Statement, Planning Statement and Location Plan, at Appendices EHP19 to EHP22].

5.2.32. It is important to emphasise that in 2017, having provided education in modular classrooms on its temporary site for 3 years, The Heights Primary School received an Ofsted rating of "**Outstanding**" [source: The Heights Primary School details on the DfE [website](#)]. It is clearly possible to deliver outstanding education in modular classrooms over a prolonged period.

5.2.33. **Thirdly**, DCC would not be giving due regard to its own approach to the use of temporary classrooms at other school sites elsewhere in Devon **for periods up to 15 years**. For example:

- [DCC/4113/2019](#) - Retention of the existing modular classroom block (02) **for 15 years**; Stokenham County Primary School, Coleridge Cross TQ7 2SJ.
- [DCC/3981/2017](#) - Retention of 2 temporary classroom units (Blocks 02 and 03) **for a further 8 years**; Whitchurch Primary School, Whitchurch, PL19 9SR.
- [DCC/3966/2017](#) – Retention of Temporary Classroom **for a further ten years**; Bridestowe Primary School, Bridestowe EX20 4EL.

5.2.34. DCC would also not be giving due regard to the approach that it adopted locally regarding the provision of temporary accommodation at Broadclyst Primary School while a new school was being constructed at West Clyst (planning application [18/0403/FUL](#)).

5.2.35. The associated Planning Design & Access Statement stated as follows:

Project: Proposed Temporary Classrooms & Re-located Canteen. Phase III  
Broadclyst Primary School, Broadclyst EX5 3JG

#### 1. THE SITE CONTEXT

Broadclyst primary school is a large school situated on the outskirts of Broadclyst Village within a conservation area. The site comprises of several buildings all differing ages, the oldest of which was the original village school, grade 2 listed. In addition, there are grade 2 listed stone walls forming part of the southern boundary to the site.

The school is moving forward with academy status which has driven the need for additional classroom space on a temporary basis while the new school is being constructed at West Clyst. The operational target date for the new school is September 2019.

[Source: Planning Design & Access Statement, at Appendix EHP23]

5.2.36. It is evident from the following Delegated Report extract that DCC fully supported the use of temporary classrooms for this purpose:

Devon County Council Education Dept

28/03/18 - Devon County Council fully support the above planning applications. The temporary classrooms will ensure that there is sufficient pupil places within the locality in advance of the permanent new school to be delivered at West Clyst.

[Source: Delegated Report, at Appendix EHP24]

### 5.3. EHP Commentary & Conclusions on Primary Education Impact & Mitigation

5.3.1.The current main modifications proposed by EDDC to the Development Plan Document of the Cranbrook Plan states as follows (with our emphases):

***"3.14 Owing to the lack of existing capacity that exists within the education system locally, Devon County Council have advised that they would expect a primary school to be delivered alongside the first phase of any residential development"***

and within MM11 of the same document EDDC also states:

***"School land as required by Policies CB2 – CB4 (for Bluehayes, Treasbeare and Cobdens) shall be identified before planning permission is first granted for development in each of these three expansion areas. The land must be secured through appropriate legal agreements with access and step in rights included. Delivery can be made either through direct delivery by developers or by the Local Education Authority (LEA) / school provider (SP) where there is secured developer funding (including where necessary appropriate bonds) for that school.***

*Where the delivery is by the LEA/SP, then for the first school the secured land must be transferred, with construction access, prior to the commencement of any dwelling\*, while for the second school the land should be similarly transferred by the 750th dwelling\*. Subsequent servicing of the sites by the developer must be completed prior to occupation of the first dwelling\* for the first school, and prior to occupation of the 750th dwelling\* for the second school.*

***Where delivery is by the developer then the first primary school must be delivered before the first occupation of the 30th dwelling\*. The second primary school must be delivered before the first occupation of the 1650th dwelling\* in the event that the 420 place primary school is delivered first or the 2500th dwelling\* in the event that the 630 place primary school is delivered first. Once school land has been transferred or School delivery (if by direct delivery) has occurred in either the Bluehayes or Treasbeare expansion area the residual site within the other of these two areas can be released for alternative uses.***

*\* = trigger point to be assessed across all 4 expansion areas”*

[Source: Main modifications proposed by EDDC to the Development Plan Document of the Cranbrook Plan pages 24 and 49, at Appendix EHP25]

5.3.2.In our opinion, these requests suggest that **EDDC appear to be choosing to prioritise securing permanent primary school capacity on one of three expansion areas rather than ensuring housing delivery for the area.**

5.3.3.However, on the basis of the analyses and observations made within this Assessment there are aspects of the **EDDC requests above which are either flawed, or not supported by evidence, or both.**

5.3.4. **Firstly**, in our opinion **DCC has provided neither sufficient nor robust evidence in order for EDDC to justify its following request** within MM11 of the Main Modifications to the Cranbrook DPD:

*"Where delivery is by the developer then the first primary school must be delivered before the first occupation of the 30th dwelling"*

[Source: Main modifications proposed by EDDC to the Development Plan Document of the Cranbrook Plan page 49, at Appendix EHP25]

5.3.5. **Secondly**, if evidence is indeed provided by DCC at a later date that "*the first primary school must be delivered before the first occupation of the 30th dwelling*" and if a school site is not acquired on one of the three expansions areas cited earlier then in order to meet its statutory duty to secure sufficient school places DCC may need to either:

- A. provide modular or temporary primary school accommodation until a new school opens, and/or
- B. ensure that another primary school site is acquired by DCC such that the new school can open on another site outside of the 3 expansion areas of Bluehayes, Treasbeare or Cobdens.

5.3.6. According to DCC the need for a new school in the Cranbrook area is not solely driven by dwellings coming forward on the 4 expansion areas of Bluehayes, Treasbeare, Grange or Cobdens. According to DCC it would appear that the early requirement for the first additional new primary school is due to an existing, known and defined pressure for places due to the following factors:

#### 4. CONCLUSION

There is a clear need for the early delivery of primary school buildings in Cranbrook due to the higher than average birth rates and high pupil yields from new housing. Therefore, there is a need to secure the primary school provision very early in the proposed expansion area firstly to ensure sufficient pupil places but also to facilitate the procurement of a school sponsor to operate the new school.

[Source: DCC - Position Statement - Additional information on Cranbrook Infrastructure Delivery Plan - Appendix 2: Cranbrook Education Capacity Assessment page 4, at Appendix EHP17]

5.3.7. With regard to 'A' above, as set out earlier in this Assessment, 3 local primary schools are unlikely to be able to provide sufficient space for temporary accommodation. However, **modular or temporary classrooms could be located on land at Cranbrook Education Campus**, as indicated in the DCC Position Statement cited earlier "*There is extensive land available at the Cranbrook Education Campus and as such there is potential that such a solution could be provided there.*"

5.3.8. Furthermore, contrary to DCC's comments in February 2020 which rely solely on a letter from Ted Wragg Multi-Academy Trust, **DCC has not set out robust evidence that temporary primary school capacity cannot be provided on land at Cranbrook Education Campus.**

5.3.9. With regard to 'B' above, if there are further delays to one of the 4 expansion areas of Bluehayes, Treasbeare, Grange or Cobdens being approved, or if one of these sites is approved but does not build more than 29 dwellings and hence trigger the delivery of a new primary school on-site, **DCC will still need to provide additional primary school capacity in the Cranbrook area.**

5.3.10. It is evident that DCC will consider buying land for a new school site if necessary. The current DCC Education Infrastructure Plan (revised) states as follows (with **our emphasises**):

*"Securing school sites...*

*In some cases, Devon County Council may purchase a school site in advance of development coming forward. This however will be on the basis that all future development makes a contribution to reimburse the Education Authority proportional to the size of development and the cost of land."*

[Source: DCC Education Infrastructure Plan (revised) Page 64 Appendix C, at Appendix EHP12]

5.3.11. DCC has not set out any evidence as to why this other option cannot be pursued locally, if necessary.

5.3.12. On the above basis in our opinion **there is currently no evidence that has been presented thus far by DCC or EDDC which enables EDDC to justify its following request** within MM11 of the Main Modifications to the Cranbrook DPD:

*"School land as required by Policies CB2 – CB4 (for Bluehayes, Treasbeare and Cobdens) shall be identified before planning permission is first granted for development in each of these three expansion areas."*

[Source: Main modifications proposed by EDDC to the Development Plan Document of the Cranbrook Plan page 49, at Appendix EHP25]

5.3.13. Rather than rely solely on a new school site at Bluehayes, Treasbeare or Cobdens as defined above, DCC can instead either:

- A. provide modular or temporary primary school accommodation until the new school opens, and/or
- B. ensure that another primary school site is acquired by DCC such that the new school can open on another site outside of the 3 expansion areas of Bluehayes, Treasbeare or Cobdens.

5.3.14. In our opinion, **DCC has not yet set out evidence to EDDC which would discount these options** even though these options are entirely feasible and would enable EDDC to still prioritise housing delivery for the area while DCC is still able to secure sufficient additional primary school capacity when it is necessary.

## 6. Appendices

The following appendices accompany this document:

- APPENDIX EHP01 - DfE Securing Developer Contributions for Education (November 2019)
- APPENDIX EHP02 - DfE - Home to School Travel and Transport Guidance (July 2014)
- APPENDIX EHP03 - DfE - School Capacity Survey Forecast Guidance (June 2019)
- APPENDIX EHP04 - Site Location Plan
- APPENDIX EHP05 - Site Location (wider area)
- APPENDIX EHP06 - DCC School Forecast - Rockbeare Church of England Primary School (with EHP annotations)
- APPENDIX EHP07 - DCC School Forecast - Cranbrook Education Campus (with EHP annotations)
- APPENDIX EHP08 - DCC School Forecast - Whimple Primary School (with EHP annotations)
- APPENDIX EHP09 - DCC School Forecast - St Martin's Coffe Primary & Nursery School (with EHP annotations)
- APPENDIX EHP10 - 19\_0133\_FUL-Design\_and\_Access\_Statement-1032556 (additional 60 primary school places at Cranbrook Education Campus)
- APPENDIX EHP11 - DCC School NOR - Autumn 2021 (extracts with EHP annotations)
- APPENDIX EHP12 - DCC Revised Education Infrastructure Plan (Oct 16 FINAL)
- APPENDIX EHP13 - Cranbrook reserved matters sites & housing projections analyses - PT 02022022
- APPENDIX EHP14 - EDDC housing-monitoring-update-to-year-end-31-march-2020-appendix (extracts)
- APPENDIX EHP15 - DCC Consultee\_Replies-1276494 (schools May 2016)
- APPENDIX EHP16 - DCC Education approach for developer contributions (Dec 2021)
- APPENDIX EHP17 - DCC information-5220-for-cranbrook-infrastructure-delivery-plan (5th February 2020)
- APPENDIX EHP18 - DCCC Cranbrook Plan Examination Statements - matter-9-written-statement-devon-county-council (8th January 2020)

(continued...)

- APPENDIX EHP19 - RBC - 14\_0940 - Design & Access Statement - The Heights Primary School, 82 Gosbrook Road, Caversham, Reading
- APPENDIX EHP20 - RBC - 14\_0940 - Location Plan - The Heights Primary School, 82 Gosbrook Road, Caversham, Reading
- APPENDIX EHP21 - RBC - 14\_0940 - Planning Statement - The Heights Primary School, 82 Gosbrook Road, Caversham, Reading (initial opening)
- APPENDIX EHP22 - RBC - 18\_0552 - Planning Statement - The Heights Primary School, 82 Gosbrook Road, Caversham, Reading (expansion to full 2FE)
- APPENDIX EHP23 - 18\_0403\_FUL-Design\_and\_Access\_Statement-815249
- APPENDIX EHP24 - 18\_0403\_FUL-Delegated\_Officer\_Report-1194693
- APPENDIX EHP25 - EDDC 2b. Cranbrook Plan DPD with proposed MM final