



ALFREDSON YORK
ASSOCIATES

TOWN AND COUNTRY PLANNING ACT 1990

SECTION 78 APPEAL

BY

Accrue (Forum) 1 LLP

PLANNING APPLICATION FOR RESIDENTIAL DEVELOPMENT

Land at former B&Q, Stretford, Trafford

SUMMARY PROOF ON EDUCATION MATTERS

JOHN POWELL LLB (Hons), OPERATIONS DIRECTOR, ALFREDSON YORK ASSOCIATES LTD.

PUBLIC INQUIRY DATE: 11th JANUARY 2022

PINS REF: APP/ Q4245/W/20/3258552

LPA REF: 100400/OUT/20

1. Introduction

1.1. Qualifications & Experience

1.1.1. My name is John Robert Powell. I hold an Honours degree in Law from the University of East Anglia.

1.1.2. I have worked in the field of school place planning and related matters since 1994 in central and local government, and private practice

1.1.3. I was instructed by Accrue (Forum) 1 LLP to provide an independent analysis of the educational issues arising from the proposed development and to liaise with Trafford Metropolitan Borough Council ("the Council") to attempt to reach an agreed position.

1.2. Scope of Evidence

1.2.1. My evidence considers the likely impact on local education infrastructure arising from the proposed development and the appropriate methodology for calculating the mitigation that may be required to meet any such impact.

1.2.2. My main Proof is presented in six sections: firstly, a statement of the issues before the Inspector (section 2); secondly, an analysis of the Statutory and Policy framework (section 3); thirdly, a history of correspondence on the Education matters between the parties (section 4); fourthly, an analysis of the Council's rationale for the contribution requests made (section 5); fifthly, the Appellant's position in relation to appropriate mitigation (section 6); and finally, a summary and conclusions (section 7).

2. Summary of Key Findings

- 2.1. The Council's methodology in assessing the appeal site is significantly flawed. The methodology itself carries little weight, as it has neither been adopted as planning policy nor been consulted upon externally to the Council.
- 2.2. The assessment of the appeal site using this methodology is not fairly and reasonably related to the appeal site, as it treats all dwellings over 1-bed as having the same child yield. It is also not related to the appeal site as it assesses the impact of the population which will arise when the development is complete, against the numbers that are currently on roll in schools rather than those forecast to attend in the future.
- 2.3. The assessment of the appeal site using the Council's methodology also fails to show that a contribution is necessary in planning terms since the impact of previously granted planning permissions are counted only in terms of demand and not in terms of places to be funded, the number of out of borough pupils attending the local schools is greater than the impact of the appeal site, the forecast numbers on roll at primary level are lower than the current numbers even including previously granted planning permission and the forecast numbers for secondary, including previously granted planning permissions, are lower than the forecast level for this current year.
- 2.4. The Council also seeks a contribution from the appeal site even though the level of surplus will be inside the range the Council quotes, even though this range has never been defined for use in the context of assessing planning applications.

3. Summary and Conclusion

3.1. Summary

3.1.1. In my Proof I set out why the Council's position is flawed. The Contribution as sought is neither necessary nor reasonably related in size and scale.

3.1.2. The yield being sought by the Council does not reflect the appeal scheme.

3.1.3. This yield should also be applied to other similar schemes that the Council say are relevant in its assessment of the site.

3.1.4. The Council's failure to use forecasts at the time that the appeal scheme will be delivering pupils, and instead using current numbers on roll, means the contribution is not related to the site, as it does not relate to the time when the impact will be felt.

3.1.5. It is my opinion that no contributions are necessary due to the availability of school places locally, the forecast position in these schools, the places that have already been funded and not taken into consideration, the yield from the development and the number of pupils attending from outside Trafford.

3.2. Conclusion

3.2.1. The appeal should be allowed and, the Appellant contends, the Unilateral Undertaking be approved with education infrastructure contributions that accord with CIL regulations.