



# TRAFFORD COUNCIL

**Appeal by: Accrue (Forum) 1 LLP**

**Site Address: Former B&Q Site, Great Stone Road, Stretford, M32 0YP**

**LPA reference: 100400/OUT/20**

**PINS reference: APP/Q4245/W/20/3258552**

## **Education Issues**

Summary of Proof of Evidence of Sarah Butters  
On behalf of Trafford Council

## **Appendices**

1. Educational Background for Housing Developments
2. Education contribution methodology April 201
3. Local authority school places scorecard 2019
4. Local authority school places scorecard Underlying Data
5. DfE Home to School Travel and Transport Statutory Guidance
6. Trafford All Age Travel Assistance Policy
7. National Audit Office Capital Funding for New School Places March 2013
8. National Pupil Projections Methodology 16 July 2020
9. Education contribution calculation 27 May 2021
10. Education contribution calculation 30 November 2021
11. Response to AYA EIS 11 November 2020
12. Pupil Forecasting Methodology

### **1. Introduction**

- 1.1 I have worked in a management role within Trafford Education for 18 years and currently have strategic responsibility for school organisation, place planning, admissions, school transport and access.

### **2. Statutory Responsibilities**

- 2.1 Trafford Council has a statutory responsibility under the Education Act 1996 to commission sufficient school places in number, character and equipment for everyone who lives in Trafford.

### **3. Educational Background for Housing Developments**

- 3.1 Trafford Schools are amongst the best in the country attracting families into the area, particularly to access selective secondary schools. (Appendix 1).
- 3.2 A forecast is made for pupils resulting from housing developments and an education contribution is sought from developers where required to mitigate the impact of development on existing infrastructure.

### **4. Education Contribution Methodology**

- 4.1 The latest update to education contribution methodology (Appendix 2) was April 2021. The only amendment was the cost of provision rate to reflect rates in DfE LA School Places Scorecard 2019 (Appendix 3&4).
- 4.2 The council carry out an education contribution assessment for all residential developments with a net increase of 10+ dwellings. Houses and apartments with 2+ bedrooms are counted. A council-wide average yield rate of 3 pupils per year group per 100 homes is applied.
- 4.3 Statutory walking distance is used to identify schools for the capacity assessment. This is the shortest walking route, rather than straight line radius, in line with DfE Home to School Travel and Transport statutory guidance (Appendix 5) and Trafford policy (Appendix 6).

- 4.4 The permitted operational surplus range is 5% to 10% and this is not counted as available when calculating developer contributions. The minimum operational surplus needed Trafford-wide is 5%, but surplus of up to 10% is permitted to account for fluctuation in demand, parental choice and to accommodate in-year applications.
- 4.5 The methodology includes a school capacity assessment and this is carried out annually comparing total Published Admission Number (PAN) with Number on Roll (NOR). It is usually done every January but at the request of the appellant was updated to the October 2021 position.

## **5. Education Contribution Assessment**

- 5.1 A number of education contribution assessments have been carried out. The first 3 included a capacity assessment comparing Total PAN with NOR in January 2020, all identified surplus capacity was within permitted operational surplus, all calculated same yield of 47 primary and 33 secondary pupils:
  - 29/07/20 - contribution £1,233,623
  - 14/09/20 - rounding error identified, revised contribution £1,227,954
  - 27/05/21 - methodology updated to reflect latest cost of provision rates, revised contribution £1,461,415.
- 5.2 The LPA did not request a secondary contribution prior to the assessment dated 27/05/21 but this was a mistake. Every iteration of the education contribution assessment carried out by Trafford Education included a contribution for secondary places.
- 5.3 On 30/11/21, Trafford agreed to update the capacity assessment to use October 2021 NOR and to review the list of developments surplus places were allocated to. A new assessment was issued 30/11/21 (Appendix 10).
- 5.4 For primary, the methodology calculates 344 surplus places which is 8.1%. After discounting 219 surplus places allocated to other developments the number reduces to 125 surplus places which is 2.9%, to be retained as operational surplus.
- 5.5 For secondary, the methodology calculates 463 surplus places which is 15.5%. After discounting 288 surplus places allocated to other developments, the number reduces to 175 surplus places which is 5.9%, to be retained as operational surplus.

## **6. Pupil Yield**

- 6.1 A council-wide yield of 3 pupils per year group per 100 homes is used for both primary and secondary for all homes with 2+ bedrooms. It gives a yield of 21% primary and 15% secondary. The average yield is based on a detailed piece of research carried out in 2014, using data extracted from the Census 2011 and it is checked regularly to ensure it remains appropriate.
- 6.2 The calculated yield for 100400/OUT/20 is 47 primary and 33 secondary pupils.

- 6.3 The appellant has referred to 3 alternative yield methodologies which could be used, 2 of which generate more pupils and 1 which generates less pupils. The council's established methodology is used consistently in every assessment and has successfully secured s106 contributions from other developments.
- 6.4 Emerging evidence in Trafford indicates a higher yield from apartments close to popular schools. The B&Q site is close to two oversubscribed Trafford primary schools, Kings Road (0.5 mile) and Seymour Park (1.0 mile). One example for apartments in this area is 37 Seymour Grove, a 40-unit block with average yield of 104% primary and 21% secondary. Other small studies of apartments support the use of the average 3 pupils per year group per 100 homes. More detailed research is scheduled in 2022.

## **7. Response to Alfredson York Associates (AYA) Education Impact Statement (EIS)**

- 7.1 The appellant's statement of case relies on the AYA EIS but it contains a large number of errors, miscalculations and incorrect assumptions. Full response Appendix 11.
- 7.2 AYA compare NOR with Net Capacity (NC) to calculate surplus. The council compare NOR with Total PAN which provides an accurate calculation of surplus places as it is based on the formally determined admission number.
- 7.3 AYA EIS uses 2 and 3 mile straight line distances to identify schools to include in the capacity assessment. The council use 2 and 3 mile walking distances. This results in the incorrect schools being identified by AYA.
- 7.4 AYA EIS capacity assessments include incorrect figures for NC and NOR in primary and secondary and many totals are incorrectly calculated.
- 7.5 AYA concludes 9.93% primary surplus when comparing NC with NOR when it is actually 3.54%. Using the correct methodology which compares Total PAN to NOR, using only schools in walking distance, there were 233 surplus places in January 2020, a rate of 5.47%.
- 7.6 AYA EIS 3.5.5 significantly overstates total PAN as it does not adjust for infant and junior schools.
- 7.7 The AYA EIS 3.6.2 incorrectly concludes YR vacancy rate of 12.62% when the correct figure is 14.94%. It is not appropriate to only consider YR as places must be available to meet significant in-year demand across all year groups. On average, these result in 877 primary and 297 secondary placements each year. 637 (73%) primary and 203 (68%) secondary are newly resident in Trafford.
- 7.8 To illustrate impact, YR cohort in September 2014 increased by 4% by Y6 in September 2020.
- 7.9 AYA 3.7.3 refers to falling birth rates but this does not take into account migration into our area between birth and starting in YR. Trafford's pupil forecasting methodology (Appendix 12) utilises GP registrations as the basis to forecast future pupils.

7.10 AYA EIS 3.8.1 incorrectly includes sixth form places. The council is only requesting contributions for secondary places Y7-Y11 so it is incorrect in principle to conflate secondary capacity with sixth form capacity.

7.11 AYA concludes 11.49% secondary surplus when comparing NC with NOR is 11.49%. Using the correct methodology which compares Total PAN to NOR, and only including schools in statutory walking distance, there were 527 surplus places in January 2020, a rate of 17.68%. Once surplus places already allocated to other developments are taken into account, it was within the permitted 10% operational surplus.

## **8. Community Infrastructure Levy (CIL) Test**

8.1 The CIL tests are met. The education contribution assessment considers the impact of this development on local schools within statutory walking distance and whether the existing education infrastructure in the area can support this, linked to the number and type of dwellings provided by the developer.

## **9. SCAP Forecasts**

9.1 Trafford's pupil forecast methodology used in the statutory SCAP survey is well established and reviewed annually by DfE. LA school places scorecard 2019 indicates the accuracy of pupil forecasts for one year and three years ahead and Trafford is a consistently high performer, better than the national average. In 2019, this was -0.1% (1-year) and 1.3% (3-year) for primary and -0.9% (1-year) and -0.9% (3-year) for secondary.

9.2 October 2021 NOR indicate 15 primary pupils more than projected in pupil forecasts. Aggregated pupil forecasts for schools within statutory walking distance indicate an increased cohort size over the next 4 years, with a small decrease in year 5.

9.3 October 2021 NOR indicate 67 less secondary pupils than projected in pupil forecasts. Aggregated pupil forecasts for schools within statutory walking distance indicate an increased cohort size over the next 5 years, with small decreases in year 6 and 7.

9.4 If these projected decreases do materialise, surplus capacity would increase but remain with the permitted operational surplus.

## **10. Conclusion**

10.1 The education contribution calculation follows an established methodology and clearly indicates no available surplus capacity.

10.2 All education contributions are based on an assessment of probability and averages. The council-wide pupil yield factor is tested regularly and has been used consistently in all calculations including where contributions have been secured.

10.3 The CIL tests are met, the requested contribution is necessary to mitigate against the impact on education infrastructure and it is directly related to the development.