

Staffordshire County Council Education Response to South Staffordshire Council Publication Plan (Regulation 19)

Introduction

Staffordshire County Council (SCC) has a statutory duty to ensure that there are sufficient school places to meet the needs of the population. The School Organisation Team (SOT) acts on behalf of the Local Authority to carry out this duty and to ensure that resources are used efficiently.

The district of South Staffordshire is made up of four distinct areas for the purpose of school place planning: 1) Cheslyn Hay & Great Wyrley, 2) Kinver & Wombourne, 3) Codsall & Perton and 4) Penkridge. These areas are broken down into 'smaller school place planning areas' and are used to plan the number of school places required. These school place planning areas have been grouped based on the geographical location of schools, and by assessing pupil movement between schools and catchment areas in line with Department for Education guidance.

This is the second Regulation 19 consultation that has been carried out for the Local Plan Review. This is due to changes to the National Planning Policy (NPPF) in late 2023 and as a result of those changes there are fewer Green Belt sites in the plan. The largest impact this change has had was for the additional 4,000 dwellings proposed as part of unmet housing for the Greater Birmingham Housing Market Area (GBHMA) which has now been reduced to 640 dwellings.

The new Local Plan will run for a 15 year period from 2023-2041 with an annual requirement of 227 dwellings per annum. Making a total requirement to deliver 4,726 dwellings of which 4086 dwellings are for own need and 640 dwellings for GBHMA need.

This consultation response does not assess the impact or requirement for additional school transport, nursery or SEND provision.

The response is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period that the revision of the Local Plan covers, circumstances may change which could change education infrastructure requirements.

Supporting Information

In line with Department for Education (DfE) guidance the School Organisation Team plan school places on a planning area basis; groups of schools based on geographical location, local demographics and other factors such as pupil movement and school phases.

A two-tier education system, with Primary (4-11 years) and Secondary (11-18 years) schools, operates in Cheslyn Hay & Great Wyrley and Kinver & Wombourne,

whilst in Codsall, Perton and Penkridge, a three-tier system with First (4-9 years), Middle (9-13 years) and High (13-18 years) schools, operates.

Sixth form provision is offered on site at all secondary and high schools within the district.

School sizes are referred to as Forms of Entry (FE), which are the number of classes of 30 per school year group. For example, a 2FE school would have 2 classes of 30 pupils in every year group (60 pupils per school year group).

Currently within South Staffordshire District 30 of the 46 schools physically located in the area are Academies or Free Schools. This number is growing all the time as new schools open, or maintained schools convert to or become sponsored academies. Academies and Free Schools are independent from the local authority and the Department for Education/Secretary of State would be the decision maker for significant changes to an academy.

A development or a combination of small developments in an area of 750+ dwellings may trigger the need for a new primary school and a development or a combination of small developments of 4000+ dwellings for a new secondary school.

It should be made clear to prospective developers that where a new school is required developers must provide land for school site(s) in addition to education contributions to mitigate the development.

We would seek assurance from SSDC that where a number of proposed developments in one area necessitate a new school, land would be safeguarded for education provision and that the developers contribute proportionally to the cost of buying the land.

Whilst this is not an exhaustive list, where new schools are required, the sites would need to be of regular shape, level, flat and without significant topographical features that would be considered incongruent with use as a school, free from contaminants and other adverse ground conditions, and suitable for the phase of education proposed. Other site requirements will also be required such as but not restricted to the provision of utility services onto the site, drainage and vehicular access and will be detailed and discussed when appropriate.

There would need to be a vehicular access route from the adopted highway to the school site at least sufficient and suitable for construction vehicles and vehicles for the delivery of materials for the construction of the school on the school site until the school opens at which point the vehicular access needs to be of an adaptable nature. Other site requirements may be required, and these will be detailed and discussed when appropriate.

Additional land adjacent to any new school may also need to be safeguarded as education land to ensure future growth.

Where existing schools have insufficient land to expand on their current site consideration may be given to allocating additional land adjacent to the school to

facilitate growth if this is achievable. In addition, any new school proposed may also need to have additional land safeguarded to allow for future growth.

Consideration is also required of the implications of proposed housing developments on school transport. Children in villages and settlements without local schools may be entitled to home to school transport where the catchment or nearest school is over two miles walking distance at primary age or three miles at secondary age. There would be additional implications in terms of coach park capacity, transport costs, logistics and highway constraints around school sites in these circumstances. This could involve education contributions being sought towards additional school places, larger coach parks, transport costs and highway improvements such as crossing points.

Any proposed development where the catchment and nearest schools are all over the reasonable walking distance noted above may increase the cost to the public purse for school transport. Consideration must be given to the ongoing costs both to the developer and the public purse of transport costs for pupils living on such developments, and the sustainability and environmental impacts of the site(s). S106 contributions may be required to offset any additional costs related to new development. However, prior consideration needs to be given before to whether growth in such areas is sustainable as ultimately the public purse will pick up the cost of school transport when any developer subsidy ends.

New settlements and urban extensions should be expected to meet the full education requirement either through new schools, expansions or use of existing capacity. Should it not be possible to increase or provide additional capacity to mitigate housing development it may be necessary to transport pupils to areas where there is capacity or the potential for it to be provided. In such circumstances it would be expected that the developer meets these additional transport costs, along with contributions sought towards additional school places, as the need would have arisen as a direct result of their housing development. Provision of additional school transport in order to provide school places away from the local area impacts on the ability of pupils to use sustainable modes of travel to attend school. This could impact on the local highway infrastructure from the potential increase in vehicles and impacts negatively on proposals to reduce carbon emissions.

Education contributions will be sought towards mitigating the impact of new housing developments where necessary.

Any new first school(s) would need to be at least 1FE (150 places) plus nursery provision and would require land of 7,635m² to be provided and allocated within the local plan to facilitate this. To deliver a new 1FE First School (150 places + nursery provision) would cost in the region of £6.2 million pounds (as at Q2-2022). A 2FE First School (300 places + nursery provision) would require land of 12,870m² to be provided and allocated within the local plan to facilitate this and would cost in the region of £8.2 million pounds (as at Q2-2022).

Any new primary schools would need to be at least 1FE (210 places) plus nursery provision and require land of 11,415m² to be provided and allocated within the

local plan to facilitate this. To deliver a new 1FE Primary School (210 places + nursery provision) would cost in the region of £7.6 million pounds (as at Q2-2022). A 2FE Primary School (420 places + nursery provision) would require land of 20,430m² to be provided and allocated within the local plan to facilitate this and would cost in the region of £11.4 million pounds (as at Q2-2022).

Any new secondary schools would need to be at least 5FE (750 places) and require land of 86,076m² to be provided and allocated within the local plan to facilitate this. To deliver a new secondary school of 5FE would cost in the region of £26.6 million pounds (as at Q2-2022).

The costs above are based on estimated new school costs as at Q2 2022. The building cost multiplier and new school costs are due to be updated and it is anticipated that the estimated cost could increase significantly due to current market conditions. This is a minimum cost to deliver any new school and will need to be updated as and when any new school is required.

Delivery of construction projects has become challenging with issues in demand, supply and project risk and opportunity. Commodities prices for copper, steel, and aluminium have all increased. Figures released by the Department for Business, Energy & Industrial Strategy (BEIS) in May 2022 show the Construction Materials Index rising by 3.6% - a 22.9% increase over the last 12 months. With the continued high energy prices, further price increases for heavy side materials should be expected.

There have been major changes in Building Regulations for the first time since 2013 to reflect changes in how buildings are being constructed and the environment, which are expected to further increase the capital cost to deliver construction projects.

The Local Plan should help to ensure that there is sufficient education infrastructure available to mitigate the impact of the proposed new homes in the right place at the right time. SCC would request that land is allocated for educational infrastructure when considering areas for development. Whether this is land adjacent to existing schools, land within a large, proposed development or land within a number of proposed developments.

In relation to the proposed areas of growth and the housing allocations for other areas we comment as follows:

Proposed Housing Growth – Locality 1

Penkrige Town

There are 1,297 dwellings proposed in Penkrige as part of the updated Local Plan.

This number of new homes is likely to generate 195 First school aged pupils, 156 at Middle school pupils, 117 at High school pupils and 39 pupils in sixth form.

Penkridge operates a three tier education system and contains three first schools, one middle school and one high school; the high school serves Penkridge Centre and the wider rural area.

To fully mitigate the proposed new housing further educational infrastructure would be required. We note that 1.5 hectares of land has been allocated for a new 1.5FE First School (225 places + nursery provision) which is of a sufficient size and other land requirements are detailed above. Education contributions will also need to be secured for the cost of the school building which is in the region of £6.7 million pounds (as at Q2-2022).

Penkridge Middle School and Wolgarston High School would both require up to 1FE of additional school infrastructure to mitigate the impact of the proposed developments (an additional 120 and 90 places respectively).

Southern Edge of Stafford – (A34 corridor)

There are 81 dwellings proposed in the Southern edge of Stafford as part of the updated Local Plan.

This number of new homes is likely to generate 17 Primary school aged pupils, 12 Secondary School pupils and 2 pupils in sixth form.

For school place planning purposes this site, due to its geographical location fall into Stafford South Primary Cluster and Stafford High School Cluster. Stafford operates a two-tier education system.

Additional infrastructure may be required at both primary and secondary phase to mitigate the cumulative impact of the Local Plan dwellings proposed together with those included in the Stafford Borough Local Plan, therefore education contributions will be required to make these developments acceptable in planning terms.

Huntington

There are 39 dwellings proposed in Huntington as part of the updated Local Plan.

This number of new homes is likely to generate 8 Primary school aged pupils, 6 at Secondary School pupils and 1 pupil in sixth form.

For school place planning purposes these sites, due to their geographical location fall into Cannock 1 Primary Cluster and Cannock High School Cluster. Cannock operates a two-tier education system.

Additional infrastructure may be required at both primary and secondary phase to mitigate the cumulative impact of the Local Plan dwellings proposed together with those included in the Cannock District Local Plan, therefore education contributions will be required to make these developments acceptable in planning terms.

Proposed Housing Growth – Locality 2

Brewood

There are 63 dwellings proposed in Brewood as part of the updated Local Plan.

This number of new homes is likely to generate 9 First school aged pupils, 8 at Middle school pupils, 6 at High School pupils and 2 pupils in sixth form.

Brewood operates a three-tier education system and contains one first school, one catholic primary and a middle school which serves the wider rural area. Brewood falls into the catchment area of Wolgarston High.

It is likely that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the school's catchment, therefore education contributions will be required to make these developments acceptable in planning terms.

Transport to high school education would be required from these sites.

Coven

There are 48 dwellings proposed in Coven as part of the updated Local Plan.

This number of new homes is likely to generate 7 First school aged pupils, 6 at Middle school pupils, 4 at High School pupils and 1 pupil in sixth form.

Coven operates a three-tier education system and contains one first school. For Middle and High provision Coven falls into the catchment areas of Brewood Middle and Wolgarston High.

It is likely that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the school's catchment therefore education contributions will be required to make these developments acceptable in planning terms.

Transport to middle/high school education would be required from this site.

Wheaton Aston

There are 18 dwellings proposed in Wheaton Aston as part of the updated Local Plan.

This number of new homes is likely to generate 3 First school aged pupils, 2 at Middle school pupils, 2 at High School pupils and 1 pupil in sixth form.

Wheaton Aston operates a three-tier education system and contains one first school. For Middle and High provision Wheaton Aston falls into the catchment areas of Brewood Middle and Wolgarston High.

It is likely that the proposed developments can be accommodated within the existing first and middle school infrastructure, but additional infrastructure may be required at Wolgarston High School to mitigate the cumulative impact of the Local Plan dwellings proposed within the school's catchment therefore education contributions will be required to make these developments acceptable in planning terms.

Transport to middle/high school education would be required from this site.

Proposed Housing Growth – Locality 3

Cheslyn Hay/Great Wyrley

There are 499 dwellings proposed in Cheslyn Hay & Great Wyrley as part of the updated Local Plan.

This number of new homes is likely to generate 105 Primary school aged pupils, 75 at Secondary School pupils and 15 pupils in sixth form.

Cheslyn Hay/Great Wyrley operates a two-tier education system and contains eight primary schools and two secondary schools.

It is likely that the proposed developments can be accommodated within the existing primary and high school infrastructure, however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Featherstone

There are 35 dwellings proposed in Featherstone as part of the updated Local Plan.

This number of new homes is likely to generate 7 Primary school aged pupils, 5 at Secondary School pupils and 1 pupil in sixth form.

Featherstone operates a two-tier education system and includes two primary schools, and the area falls into the Cheslyn Hay/Great Wyrley High school place planning area.

It is likely that the proposed developments can be accommodated within the existing primary and high school infrastructure, however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Transport to secondary education would be required from this site.

Proposed Housing Growth – Locality 4

Codsall/Bilbrook

There are 1194 dwellings proposed in Codsall & Bilbrook as part of the updated Local Plan.

This number of new homes is likely to generate 179 First school aged pupils, 143 at Middle school pupils, 107 at High School pupils and 36 pupils in sixth form.

Codsall/Bilbrook operates a three-tier education system and contains three first schools, one catholic primary, two middle schools and one high school.

To fully mitigate the proposed new housing further educational infrastructure would be required. We note that 1.3 hectares of land has been allocated for a new 2FE First School (300 places + nursery provision) which is of a sufficient size and other land requirements are detailed above. Education contributions will also need to be secured for the cost of the school building which is in the region of £8.2 million pounds (as at Q2-2022).

Further discussions will need to be held with SCC, SSDC and proposed developers to outline the masterplan for the site so it can inform how the school would be built/opened.

It is likely that the proposed developments can be accommodated within the existing middle school infrastructure within Codsall/Bilbrook however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Codsall High School would require additional school infrastructure to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham. Therefore, education contributions will be required to make these developments acceptable in planning terms.

Perton

There are 150 dwellings proposed in Perton as part of the updated Local Plan.

This number of new homes is likely to generate 23 First school aged pupils, 18 at Middle school pupils, 14 at High School pupils and 5 pupils in sixth form.

Perton operates a three-tier education system and contains two first schools, one middle school and falls into the catchment area of Codsall High School.

It is likely that the proposed developments can be accommodated within the existing first and middle school infrastructure, however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Codsall High School would require additional school infrastructure to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham. Therefore, education contributions will be required to make these developments acceptable in planning terms.

Transport to high school education would be required from this site.

Pattingham

There are 17 dwellings proposed in Pattingham as part of the updated Local Plan.

This number of new homes is likely to generate 3 First school aged pupils, 2 at Middle school pupils, 2 at High School pupils and 1 pupil in sixth form.

It is likely that the proposed developments can be accommodated within the existing first and middle school infrastructure, however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Codsall High School would require additional school infrastructure to mitigate the cumulative impact of the proposed developments within the school's catchment in Codsall/Bilbrook, Perton and Pattingham. Therefore, education contributions will be required to make these developments acceptable in planning terms.

Transport to middle/high school education would be required from these sites.

Proposed Housing Growth – Locality 5

Wombourne

There are 280 dwellings proposed in Wombourne as part of the updated Local Plan.

This number of new homes is likely to generate 59 Primary school aged pupils, 42 at Secondary School pupils and 8 pupils in sixth form.

Wombourne operates a two-tier education system and contains four primary schools and one secondary school.

It is likely that the proposed developments can be accommodated within the existing primary and high school infrastructure, however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Kinver

There are 120 dwellings proposed in Kinver as part of the updated Local Plan.

This number of new homes is likely to generate 25 Primary school aged pupils, 18 at Secondary School pupils and 5 pupils in sixth form.

Kinver operates a two-tier education system contains one infant, one junior school and one secondary school.

It is likely that the proposed developments can be accommodated within the existing primary and high school infrastructure, however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Swindon

There are 10 dwellings proposed in Swindon as part of the updated Local Plan.

This number of new homes is likely to generate 2 Primary school aged pupils, 2 at Secondary School pupils.

Swindon operates a two-tier education system and has one primary school and pupils in Swindon can access secondary education at Wombourne/Kinver High School cluster.

It is likely that the proposed developments can be accommodated within the existing primary and high school infrastructure, however dependent on the timing, phasing and dwelling breakdown of the housing developments education contributions may be necessary.

Transport to secondary school education may be required from this site.

Proposed Housing Growth – Tier 4 villages/other settlements/tier 5 settlements/windfall sites

There are 824 dwellings proposed for Tier 4 villages/other settlements/tier 5 settlements/windfall sites as part of the updated Local Plan.

Dependent on location a total of 124 first school places, 173 primary school places, 99 middle school places, 124 secondary school places, 74 high school places and 25 post 16 places are required.

As the location and numbers are not known at this time, we would assess the required mitigation (if any) on a site-by-site basis in conjunction with any cumulative impact with other proposed Local Plan sites in the same school place planning area.