

# BRIDGEND COUNTY BOROUGH COUNCIL

## REPORT TO COUNCIL

10 MARCH 2021

### REPORT OF THE CORPORATE DIRECTOR COMMUNITIES

#### EDUCATIONAL FACILITIES AND RESIDENTIAL DEVELOPMENT SUPPLEMENTARY PLANNING GUIDANCE

#### 1. Purpose of report

- 1.1 The purpose of this report is to seek Members approval to adopt SPG16 - Educational Facilities and Residential Development as Supplementary Planning Guidance (SPG) to the Bridgend Local Development Plan (LDP).

#### 2. Connection to corporate well-being objectives / other corporate priorities

- 2.1 This report assists in the achievement of the following corporate well-being objectives under the **Well-being of Future Generations (Wales) Act 2015**:-

1. **Supporting a successful sustainable economy** – taking steps to make the county borough a great place to do business, for people to live, work, study and visit, and to ensure that our schools are focussed on raising the skills, qualifications and ambitions for all people in the county borough.
2. **Smarter use of resources** – ensure that all resources (financial, physical, ecological, human and technological) are used as effectively and efficiently as possible and support the creation of resources throughout the community that can help to deliver the Council's well-being objectives.

#### 3. Background

- 3.1 In order to provide the children and young people of the County Borough with the opportunity to thrive and prosper the Council has a duty to ensure that good quality educational facilities are available, creating the opportunity to learn.
- 3.2 The development of new housing in the County Borough and the resulting increase of children and young people places existing education facilities under pressure. The planning system needs to ensure that the necessary steps are taken to avoid facilities being detrimentally affected and that adequate provision is available to cater for the learning needs of children and young people in Bridgend.
- 3.3 The guidance supplements Strategic Policy 14 and Policy COM10 of the adopted Bridgend Local Development Plan (2006-21). Its purpose is to provide advice to developers on the circumstances in which the Council may seek contributions towards the provision of educational facilities for new residential developments.
- 3.4 In summary the SPG sets out:

- The National and local Planning Policy context to educational provision;
- The Council's policy and practice relating to education;
- Guidance notes explaining the circumstances, mechanisms and the likely contributions that will be sought from residential developments;
- Examples of costings and calculations for contributions to educational facilities; and
- Guidance on how the policy will be administered.

3.5 It will enable developers to be aware, at an early stage in the development process, what educational facilities are likely to be needed and what financial contribution may be sought towards their provision.

#### 4. Current situation/proposal

4.1 On the 16<sup>th</sup> January 2020 the Development Control Committee approved a draft version of the SPG as the basis for public consultation; authorised officers to make appropriate arrangements for public consultation; and agreed to await a further report on the outcome of the consultation process.

4.2 A 6-week period of public consultation was held between 21<sup>st</sup> February and 3<sup>rd</sup> April 2020. The consultation was advertised in the following ways:

- Statutory notices were placed in the *Glamorgan GEM* on the 27<sup>th</sup> February and the 5<sup>th</sup> March;
- The consultation documents were made available for inspection with representation forms at the reception desk of the Civic Offices, Angel Street;
- Information on the consultation, including all the documentation, representation forms and how to make representations was placed on the Council's website; and
- A copy of the draft SPG was sent to approximately 300 targeted consultees including Community Councils, planning consultants, house builders and housing associations taken from the LDP database.

4.3 By the end of the consultation period seven representations were received on the draft SPG. These representations have been summarised in **Appendix 1** to this report. Copies of the full representations are held by the Planning Department, and can be viewed by Members on request.

4.4 On 21<sup>st</sup> January 2021, the Development Control Committee considered all of the representations and agreed changes to be made to the document in light of the comments received. These are now incorporated as amendments to the SPG attached at **Appendix 2**. In summary, the main areas of change in the document arising from the public consultation responses are as follows:

- Clarification that the costs of school construction will be kept under review but only changed as part of a full revision of the SPG;
- Confirmation that the costs of temporary school accommodation will be determined on a case by case basis; and

- An explanation as to how the build costs for refurbishing a school have been calculated to be 65% of the build costs of a new school.

## **5. Effect upon policy framework and procedure rules**

- 5.1 The SPG expands upon the existing land-use planning policy framework contained within the LDP giving the public and developers certainty in the Council's expectations in relation to achieving an appropriate level of Educational Facilities which will serve new residential development.

## **6. Equality Impact Assessment**

- 6.1 There are no direct implications associated with this report. The adopted SPG supplements the plans and policies of the existing LDP which was subject to an Equalities Impact Assessment.

## **7. Well-being of Future Generations (Wales) Act 2015 implications**

- 7.1 Adoption of the SPG will provide a mechanism for the Council to secure contributions that reflect the actual cost of new school construction. This will help to raise the skills, qualifications and ambitions of all people within the County Borough, contributing towards the sustainable development principles required by the Act. It will also, in turn, help inform development of the Replacement LDP, which will be prepared in accordance with the 7 Wellbeing goals and the 5 ways of working as identified in the Act.

## **8. Financial implications**

- 8.1 The adoption of SPG 16 will provide financial contributions towards the cost of providing educational facilities.

## **9. Recommendations**

- 9.1 Council is recommended to:

9.1.1 Adopt SPG16 – Educational Facilities and Residential Development (**Appendix 2**) as Supplementary Planning Guidance to the adopted Bridgend Local Development Plan.

9.1.2 Agree that the SPG, in its adopted form, be published on the Council's website.

**Janine Nightingale**

**CORPORATE DIRECTOR COMMUNITIES**

10<sup>th</sup> March 2021

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**Background documents:** None

**Appendices:** Appendix 1 - Educational Facilities and Residential  
Development Consultation Responses

Appendix 2 - Educational Facilities and Residential  
Development SPG

## APPENDIX 1

### Education Facilities and Residential Development SPG Consultation Responses

Organisation	Section No.	Page No.	Representation	Reasoned Response	Decision and Action
Coal Authority			I have reviewed the Supplementary Planning Guidance documents, the subject of this consultation, and can confirm that the Coal Authority has no specific comments to make.	Noted	No action required
Natural Resources Wales			We have no adverse comments on the above SPG.	Noted	No action required
Meryl Catherine Wilkins			This consultation document cannot predict the future of any planning as the pandemic Coronavirus has taken over and the outcome is unsure of any planning in Wales. As a very worried resident of Bridgend and Wales my declarations of interest has been made by me Meryl Catherine Wilkins in the land that your planning policies, put forward by the Bridgend County Borough Council and planning department are now being put forward to be developed and I do not agree. Policies are now out of date that Bridgend County Borough Council Planning Department and the Bridgend County Borough Council have put forward for consultation to me as a consultee of the SPG Draft Supplementary Planning Guidance and the consultation documents are fundamentally flawed because of the crisis we find ourselves in, we have no control of.	The consultee's comments are noted. The SPG intends to provide additional guidance to the policies contained within the existing Local Development Plan, which was adopted in 2013. It is not proposing any new policies. Indeed, the SPG will replace the existing document which was adopted in April 2010 and has not been updated since. Until the new SPG is adopted the existing out of date guidance will continue to be applied to planning applications. This will place the Council in a position where it is unable to seek the level of contributions required to help fund the cost of school provision. Any deficit in funding will have to be found by the Council at a time when financial budgets are limited. The new SPG is vitally important to enable the County Borough to recover from the financial impact of the Coronavirus pandemic.	No action required
Boyer on behalf of Llanmoor Homes	Table 1	11	<p>The report to the Development Control Committee of the 16th January 2020 states that the pupil yield formulas and the cost guidance contained in the existing Education SPG adopted in 2010 are in need of updating. However the increase in costs that are being suggested in the draft SPGs are substantial without sufficient evidence to justify the increases.</p> <p>Table 1 sets out the number of children generated per dwelling and whilst there is no change in the pupil yield for nursery schools (0.05) from the 2010 SPG, the secondary school pupil yield has risen from 0.18 to 0.20 ( a 11% increase) and the primary school pupil yield from 0.22 to 0.33 ( a 50 % increase). The justification set out in paragraph 5.9 states the following " <i>The pupil yield numbers above are based on the actual take up of</i></p>	As part of the review of the SPG, it was determined that the most accurate method of predicting the actual pupil yield was to undertake a review of a 'settled' site i.e. a site that had been fully constructed and which included the provision of a new school. The site chosen for this review was the Broadlands development in Bridgend, which consists of 2,305 dwellings in a mix of 1,2,3,4 and 5 bed houses. To ensure reliability and consistency, pupil data from 2011 to 2018 was analysed to determine the number of primary, secondary and post 16 pupils for each year. The enabled an average to be established and a yield rate to be calculated. The number of pupils attending special schools and SEN resource bases across the county borough as a proportion of the total pupil population was also analysed.	No action required

Organisation	Section No.	Page No.	Representation	Reasoned Response	Decision and Action
			<p><i>school places from a completed new build housing development in the County Borough which included the provision of a new Primary School."</i></p> <p>Llanmoor Homes consider it totally unreasonable to propose such significant changes to the pupil yield on the basis of a single development and that the Council must provide much more convincing evidence and an acceptable methodology to justify the increase. It is inconceivable that the pupil yield for primary schools could have increased by 50% over the 2010-2020 period. It is normally the case that larger dwellings will have a larger pupil yield and therefore it is invalid to use one single development to derive the pupil yield especially if that development does not have a wide range of dwelling sizes. Other local authorities have based their pupil yield on an analysis of the latest Census statistics and school rolls and in Cardiff the pupil yield is calculated according to the number of bedrooms per house where the primary school yield for a 1 bed house is 0.0501 and for a 5 bed house it is 0.3059 which is below what the draft SPG is suggesting for Bridgend for all size of dwellings. Llanmoor Homes would be building up to 850 homes at West Bridgend and it would be there intention to provide a wide range of housing sizes including a large proportion of 1, 2 and 3 bed houses. In this situation it is suggested the Council adopt a similar approach to Cardiff and determine pupil yields per size of house so as to ensure that contributions for each dwelling are not based on what would be more appropriate for a 5 bed house.</p> <p>The significance of the impact of the proposed increases on the viability of proposals should not be underestimated. The SPG is also proposing to increase the cost per pupil place which are based upon Welsh standardised costs which have been tested against the costs of recently completed new school construction projects. Together with the proposed increase in pupil yields there would be a substantial increase in education contributions. For example the allocation of a scheme at West Bridgend that might accommodate 1,000 dwellings in total, would generate an additional 110 primary school places at £18,599 per place i.e an additional £2,045,890, together with an additional 20 secondary school places at £29,406 per place i.e an additional £588,120. The increase in the pupil yield alone, based on the revised costs per pupil place would result in an increase in the education contribution of £2,634,010.</p>	<p>The yield rates calculated were compared to those used by other authorities across South Wales and found to be comparable. A sensitivity analysis was conducted against other residential developments within the county borough, although data from such schemes did not have the same level of accuracy and consistency due to development not being completed.</p> <p>The updated cost multipliers have been obtained from Band B of the 21st Century School and Education Programme. Welsh Government have determined how they will fund local authorities per pupil place for Band B of the programme, with the cost and size rate per pupil calculated using the area guideline for schools and the construction industry rates. The rate also includes an amount for furniture, equipment and IT. The rates have been used to compare against actual Band A costs within the county borough to ensure robustness. As with the pupil yield rates, comparison has been made with the cost multipliers used by other South Wales authorities to ensure consistency.</p> <p>The potential impact on viability is acknowledged and accounted for in the draft SPG. In fact, the Council's keenness to determine an accurate appraisal of the viability of scheme proposals is demonstrated by the approach taken during the preparation of the LDP Deposit Plan, to which the consultee refers. This follows the guidance contained within Planning Policy Wales to establish the viability of potential strategic residential allocations at the Candidate Site stage rather than leaving such matters to the planning application stage. The Council has committed to the use of the Burrows Development Viability Model to help establish agreement between developers, applicants and the Council in determining the viability of development proposals at an early stage of the development process.</p>	

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			<p>Based on the revised costs and pupil yield in the draft SPG the total contribution for education facilities for the scheme being promoted by Llanmoor Homes for approximately 850 would be as follows:-</p> <ul style="list-style-type: none"> <li>• Nursery – <math>850 \times 0.05 = 42.5 \times \text{£}18,599 = \text{£}790,457</math></li> <li>• Primary – <math>850 \times 0.33 = 280.5 \times \text{£}18,599 = \text{£}5,217,019</math></li> <li>• Secondary – <math>850 \times 0.20 = 170 \times \text{£}29,406 = \text{£}4,999,020</math></li> <li>• Post16 – <math>170 \times 0.2 = 34 \times \text{£}29,406 = \text{£}999,804</math></li> <li>• ALN primary – <math>280.5 \times 0.015 = 4.2 \times \text{£}55,797 = \text{£}234,347</math></li> <li>• ALN secondary – <math>170 \times 0.015 = 2.55 \times \text{£}88,218 = \text{£}224,955</math></li> </ul> <p><b>TOTAL EDUCATION CONTRIBUTION - £12,465,602</b></p> <p>This would be equivalent to a contribution of £14,665 per dwelling (including the dwellings required as affordable housing) which would be totally unreasonable and raises significant concerns about the viability of schemes throughout the Borough. In addition to education contributions there will be other Section 106 obligations; large amounts of infrastructure particularly for strategic sites and an element of affordable housing. Delivery and viability are likely to be key issues for consideration at the Examination into the LDP Review and the Council should be keen to ensure that they are not introducing too onerous requirements which will raise concerns about the soundness of the LDP.</p>		
Boyer on behalf of Llanmoor Homes	5.18	12	<p>Paragraph 5.18 of the draft SPG also gives cause for concern in stating that the costs will be regularly reviewed to reflect changes in the school building costs and that the most up to date data will be used at the time of the application. This is totally unacceptable. One of the main purposes of the SPG is to provide guidance to developers when carrying out viability appraisals and the figures should not be subject to change unless there is a formal review of the SPG including the necessary consultation.</p>	<p>Agree that the text of paragraph 5.18 could be misinterpreted. The costs and pupil yield figures contained in the draft SPG will be periodically reviewed to ensure that they reflect the actual cost of school construction and pupil generation respectively. If, as part of such a review, changes to the SPG are required these will be made following the same process as the adoption of a new SPG (i.e. following a public consultation exercise).</p>	<p>Amend text in paragraph 5.18 to read:</p> <p><i>“The figures above have been tested against the costs of recently completed new school construction projects and will be regularly periodically reviewed to reflect changes in school building costs. If such a review necessitates a change to the SPG, this will be undertaken as part of a formal SPG update (including public consultation). The most up-to-date data will be used at the time of the application. The figures quoted in this SPG are therefore subject to change.</i>”</p>

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Boyer on behalf of Llanmoor Homes	7.6	15	<p>With regard to paragraph 7.6 and pre application discussions there is concern that we have not been able to discuss with the education department their site locations requirements for the land at west Bridgend. It is evident that the requirements to provide education facilities on site will have a significant implication for the viability of the scheme and ensuring the principles of place making are incorporated into the master planning process and it would have been appropriate for these matters to have been discussed with the Council's Education Department at an earlier stage in the process.</p> <p>In conclusion, Llanmoor Homes accept that the increase in costs per pupil place which have been updated in line with the Welsh Government standardised costs, but object strongly to the increase in the pupil yield which has been based on the take – up of a <b>single site</b>. This cannot be relied on to justify such a significant increase of 50% in the case of the primary school yield. Llanmoor Homes consider that the Council need to undertake considerably more research into this matter based on census data and consider allocating pupil yields to different house sizes to provide a fairer reflection of the financial contribution that would be required.</p>	The consultee's response to the provision of pre-application advice is noted. In the particular circumstances quoted, the scheme was presented as part of a Candidate Site proposal. To offer a formal response to all such proposals would have been physically impossible due to the demands on staff resources. Should such a service have been provided to one scheme, it would have only been fair to offer the same level of consultation to all site promoters. If a scheme is presented as part of a formal paid pre application enquiry to the Council's planning department, then a level of consultation with the Education and Family Support Directorate will be provided depending on the requirements of that particular scheme.	No action required
Savills			We do not have any comments to make on the Education and Residential Development SPG.	Noted	No action required
Barratt & David Wilson Homes	Section 7.16 (Viability)	16	BDW support the Council's commitment to an 'open-book' approach to assessing the viability of proposals, in order that planning obligations can be secured at appropriate levels to mitigate the impact of the development, whilst ensuring that the development remains viable. This is covered in greater detail in the draft SPG in comparison to the adopted SPG and is a welcome improvement.	Noted	No action required
Barratt & David Wilson Homes	7.17	16	BDW supports the statement at Paragraph 7.17 that certain proposals may be eligible for discounted or reduced contributions if it can be proven that the value of the contribution required will jeopardise a proposal's viability.	Noted	No action required



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Barratt & David Wilson Homes	5.10 and 5.11	11	<p>Pupil Yields</p> <p>Paragraphs 5.10 and 5.11 explain how capacity is assessed to justify a request for a financial contribution. The number of pupils generated by a proposed development will be rounded up or down and will be assessed against the capacity of the school (s) in the catchment area of the new housing development. The Council will take account of the NOR to assess whether any surplus capacity exists with the catchment area (s). Net pupil places required above projected capacity are then calculated by offsetting a development's projected pupil yield against any existing school place surplus.</p> <p>This calculation does not appear to take account of the time it will take to complete a development and that school capacity often fluctuates over a period of time. It would therefore be reasonable to request that the Council also considers the delivery timescales for a proposed development compared to the projected school capacity when assessing the need for and level of contribution.</p>	<p>The time taken to complete a development is considered as one of the factors that contributes to the assessment of need for education contributions. Other factors include the capacity of schools within the catchment, the existing number of pupils on the school roll, school population forecasts, the LDP housing trajectory and existing planning consents. However, in order to provide a developer with an indication of the level of contribution required to factor into their viability appraisal, the existing capacity and number of pupils within the school is the most accurate method of predicting future need. Any Section 106 agreement can allow for this to be reviewed at the point in time that a contribution is due to be paid.</p>	<p>No action required</p>
Barratt & David Wilson Homes	5.17	12	<p>Costs</p> <p>BDW notes that there are no specific details of the 21st Century School Programme for Bridgend included within the SPG, which will be crucial in determining that contributions are necessary in specific areas and can be directly related to improvements which are programmed. Further details should be provided in the SPG.</p> <p>Paragraph 5.17 - BDW note that the cost per pupil place has increased and is now based on WG standardised costs, with Additional Learning Needs costs added as a separate category. It is accepted that these costs apply to a new school being built and it is presumed that these costs would cover the cost of the whole school, including all the necessary sports and other facilities usually provided in modern schools. However, education contributions are often used to provide temporary classrooms in existing schools, where space allows, and so we would expect the cost of this to be different (cheaper) than building a new modern school. This should be clarified in the SPG.</p>	<p>The purpose of Supplementary Planning Guidance is to provide additional information relating to the policies of the Local Development Plan. This is to help provide the reader with further detail relating to how the policies will be used and implemented in relation to the determination of planning applications. The LDP does not contain a policy on the 21st Century School Programme and the SPG does not solely relate to the delivery of that programme. However, information relating to the 21st Century School programme can be obtained from the BCBC website or by contacting the Education and Family Support Directorate.</p> <p>With reference to the costs of providing temporary classrooms as opposed to costs relating to a new school, the consultee is correct to identify that the costs will differ. Appendix A of the SPG includes the cost of temporary accommodation as additional costs that may be incurred. As these would not apply in all circumstances, the costs would be determined on a case-by-case basis and discussed with an applicant as part of a pre-application enquiry.</p>	<p>Add the following text to Appendix A to provide clarity:</p> <p><i>Any additional costs incurred will be calculated on a case-by-case basis.</i></p>

Organisation	Section No.	Page No.	Representation	Reasoned Response	Decision and Action
Barratt & David Wilson Homes	5.22	12	<p>Paragraph 5.22 advises that if a school has capacity with regards to floorspace but the space is considered to be of an unsatisfactory standard to accommodate additional pupils created by a new development, then the costs of bringing this floor space up to standard is 65% of the cost of providing new additional space. This figure has not changed from the 2010 SPG, but neither document offers any justification or a source for the use of this figure. BDW consider that the rationale for using this figure should be clarified.</p>	<p>The consultee is correct to identify that contributions towards the cost of refurbishing existing floorspace will be based on 65% of the cost of providing new additional space, and that this figure is included in the existing SPG. At that time, the figure was based on DfES data contained within <i>Funding Guidance for Building Schools for the Future Projects</i> (2005).</p> <p>In reviewing the SPG, it was found that a range of more up to date studies and data was available. These included:</p> <ul style="list-style-type: none"> <li>• <i>National School Delivery Cost Benchmarking - A national cost benchmarking study</i> undertaken by Hampshire County Council in conjunction with East Riding of Yorkshire Council and the Education Funding Agency (Feb 2017).</li> <li>• Welsh Government's Cost and Size Standards released to Local Authorities in 2017 and 2018 to apply to Band B projects of the 21<sup>st</sup> Century Schools programme. This information was agreed by the 21<sup>st</sup> Century Schools Programme Board.</li> </ul> <p>These documents provide various figures relating to costs for new build, refurbishment and extension projects. The refurb costs typically range from 62% to 71% of new development costs. On that basis, the figure of 65% sits comfortably within that range. This will be kept under review.</p>	<p>Add the following text to paragraph 5.22 to justify the percentage used:</p> <p><i>*Based on Welsh Government's Cost and Size Standards released to Local Authorities in 2017 and 2018 to apply to Band B projects of the 21st Century Schools programme.</i></p>
HBF	5.11	11	<p>HBF questions if the calculation takes account of the time it will take to build the development; on average most sites currently deliver between 40-100 units a year, with many sites having a lead in time of at least 6-12 months. This could mean that a development may take a number of years to complete, school capacity often fluctuates, and the numbers generated by the development will only reach full impact once the development is complete and fully occupied. Accordingly, it would seem reasonable to consider the delivery timescale of the development compared to the projected school capacity when assessing the need for a contribution and the level of contribution.</p>	<p>The time taken to complete a development is considered as one of the factors that contributes to the assessment of need for education contributions. Other factors include the capacity of schools within the catchment, the existing number of pupils on the school roll, school population forecasts, the LDP housing trajectory and existing planning consents. However, in order to provide a developer with an indication of the level of contribution required to factor into their viability appraisal, the existing capacity and number of pupils within the school is the most accurate method of predicting future need. Any Section 106 agreement can allow for this to be reviewed at the point in time that a contribution is due to be paid.</p>	<p>No action required</p>

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HBF	5.17	12	Although HBF accepts these costs apply to a new school being built, we presume these cover the cost of the whole school including all the sports pitches and community facilities provided in new schools. However, education contributions are often used to provide semi temporary extra classrooms, so won't the cost of these be different (cheaper) to building a new modern school.	With reference to the costs of providing temporary classrooms as opposed to costs relating to a new school, the consultee is correct to identify that the costs will differ. Appendix A of the SPG includes the cost of temporary accommodation as additional costs that may be incurred. As these would not apply in all circumstances, the costs will be determined on a case-by-case basis and discussed with an applicant as part of a pre-application enquiry.	Add the following text to Appendix A to provide clarity:  <i>Any additional costs incurred will be calculated on a case-by-case basis.</i>
HBF	5.22	12	The HBF agrees that the build cost associated with refurbishment should be reduced but question where the 65% figures comes from, this should be explained/justified in the document.	<p>The consultee is correct to identify that contributions towards the cost of refurbishing existing floorspace will be based on 65% of the cost of providing new additional space, and that this figure is included in the existing SPG. At that time, the figure was based on DfES data contained within <i>Funding Guidance for Building Schools for the Future Projects</i> (2005).</p> <p>In reviewing the SPG, it was found that a range of more up to date studies and data was available. These included:</p> <ul style="list-style-type: none"> <li>• <i>National School Delivery Cost Benchmarking - A national cost benchmarking study</i> undertaken by Hampshire County Council in conjunction with East Riding of Yorkshire Council and the Education Funding Agency (Feb 2017).</li> <li>• Welsh Government's Cost and Size Standards released to Local Authorities in 2017 and 2018 to apply to Band B projects of the 21<sup>st</sup> Century Schools programme. This information was agreed by the 21<sup>st</sup> Century Schools Programme Board.</li> </ul> <p>These documents provide various figures relating to costs for new build, refurbishment and extension projects. The refurb costs typically range from 62% to 71% of new development costs. On that basis, the figure of 65% sits comfortably within that range. This will be kept under review.</p>	Add the following text to paragraph 5.22 to justify the percentage used:  <i>*Based on Welsh Government's Cost and Size Standards released to Local Authorities in 2017 and 2018 to apply to Band B projects of the 21st Century Schools programme.</i>
HBF	5.24	12	The SPG should clarify that the land value is the value of land purchased for educational purposes only.	In circumstances where provision for a new school is to be made off-site, then the valuation of the land should reflect the land value had the school been provided on-site.	No action required