

Meeting of:	DEVELOPMENT CONTROL COMMITTEE
Date of Meeting:	03 SEPTEMBER 2026
Report Title:	SUPPLEMENTARY PLANNING GUIDANCE (SPG): EDUCATIONAL FACILITIES AND RESIDENTIAL DEVELOPMENT
Report Owner: Responsible Chief Officer / Cabinet Member	CORPORATE DIRECTOR – COMMUNITIES
Responsible Officer:	LOUIS PANNELL STRATEGIC PLANNING POLICY TEAM LEADER
Policy Framework and Procedure Rules:	There is no effect upon the Policy Framework and Procedure Rules.
Executive Summary:	The purpose of this Report is to provide the Development Control Committee with an overview of the public consultation exercise on the draft Educational Facilities and Residential Development SPG document. It also summarises the resultant changes made to the SPG and informs the Committee of the intention to seek Cabinet approval to present the document to Council to seek its adoption. Subsequent adoption of this SPG will support the effective implementation of the existing planning policy framework contained within the Replacement Local Development Plan adopted March 2024 (RLDP), the Council’s statutory land-use Planning document.

1. Purpose of Report

- 1.1 The purpose of this Report is to inform the Development Control Committee of the outcome of the public consultation exercise on the draft Educational Facilities and Residential Development SPG document.
- 1.2 The Report also informs Development Control Committee of the intention to present the Educational Facilities and Residential Development SPG (**Appendix 1**) to Council to seek its adoption.

2. Background

- 2.1 The RLDP, plays a key role in ensuring that there is sufficient and satisfactory educational provision for the children and young people generated by new residential developments.

- 2.2 The RLDP makes provision for 8,628 homes to promote the creation and enhancement of sustainable communities across the County Borough over the plan period (2018-2033). As a result, existing educational facilities will be inevitably placed under pressure to accommodate the additional pupils that will be generated through these planned residential developments. Therefore, 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 the children and young people of Bridgend.
- 2.3 Education capacity was a key consideration during preparation of the RLDP and directly informed the selection of strategic and housing allocations. The overarching strategy of the RLDP prioritises the allocation of large strategic sites of sufficient scale to support the delivery of a new primary school as a minimum. In addition, a number of smaller housing allocations have been allocated and will be required to contribute to improvements to existing educational infrastructure and/or the provision of new supporting infrastructure, where necessary, to ensure such development is acceptable in planning terms. These requirements are specified within Thematic Policies PLA1-5 of the RLDP and the Infrastructure Delivery Plan (IDP), providing clarity and certainty on infrastructure requirements associated with future development.
- 2.4 Furthermore, Policy SP10 of the RLDP sets the policy framework to ensure that all residential development proposals are supported by sufficient existing or new infrastructure. In order to mitigate likely adverse impacts and/or to integrate a development proposal, Policy SP10 requires that reasonable infrastructure provision or financial contributions must be provided by developers where necessary and secured by means of planning agreements/obligations where appropriate.
- 2.5 The Development Control Committee was informed of the need to revise the Educational Facilities & Residential Development SPG:16 at their meeting of 2 October 2025. Councillors Hughes, Griffiths and Haines who sit on the Committee, volunteered to champion production of the revised Educational Facilities & Residential Development SPG, and have since been working alongside the Strategic Planning Policy Team Leader to progress the new SPG.
- 2.6 This draft SPG provides specific guidance on:
- Education requirements for residential developments including thresholds, pupil yields, additional learning needs provision, Welsh medium provision, cost per pupil place, investment in unsatisfactory school accommodation, new schools and how contributions will be used;
 - How contributions are calculated - with a worked example; and
 - The administration of policy through the various planning stages; Section 106, negotiations with developers and how issues surrounding development viability may be considered.

- 2.7 While a large proportion of the existing SPG 16 remains relevant, key areas requiring update include pupil yield rates and associated cost guidance. The latter is particularly necessary as costs have increased since the existing SPG's adoption in 2021.
- 2.8 The pupil yield rates have been revised using evidence from completed new build residential developments in the Borough, including schemes that have delivered a new primary school. Cost guidance has also been updated to reflect cost and size standards published by the Welsh Government.

3. Current situation / proposal

- 3.1 On 10 March 2026, a draft version of the SPG was presented to Cabinet. Cabinet resolved to approve a public consultation period of 6 weeks on the draft SPG. Cabinet also authorised officers to make appropriate arrangements for that public consultation before reporting the outcome back to Cabinet for approval to send a report to Council to seek adoption of the final SPG.
- 3.2 A 6-week public consultation period was held from 17 March 2026 to 28 April 2026. The consultation was advertised in the following ways:
- Information on the consultation, including all the documentation, representation forms and how to make representations was placed on the Council's online Consultation Portal;
 - Consultation details were sent directly to approximately 190 targeted consultees including all Elected Members, Town and Community Councils, planning consultants, house builders, Registered Social Landlords (**RSLs**) and all head teachers;
 - A social media campaign was launched to promote the consultation exercise across various social media platforms, aiming to generate awareness throughout the public consultation period. Periodic posts were made on the Council's X (formerly Twitter), LinkedIn and Facebook accounts.
- 3.3 At the close of the public consultation period, one representation was received on the draft SPG, submitted by a planning consultant acting on behalf of a housebuilder. Given the extensive publicity undertaken during the consultation, together with the targeted engagement of key consultees, the limited number of responses is considered a positive outcome, indicating that no fundamental objections were raised to the content for overall approach of the draft SPG.
- 3.4 The representation primarily sought clarification on, and raised concerns regarding, specific aspects of the guidance. These included the potential for double counting where development is required to provide both land for on-site education provision and financial contributions towards the delivery of strategic sites; the revised pupil yield assumptions; and the proposed increase to cost per pupil figures, together with the potential implications for development viability.

3.5 A summary of the representation, alongside the Local Planning Authority's (LPA's) responses and the reasons why certain suggested amendments have not been incorporated, is provided at **Appendix 2**. Having considered the comments received, it is concluded that only minor amendments to the SPG are necessary. These amendments have been incorporated into the final draft SPG, attached as **Appendix 1**. For ease of reference, the paragraphs amended following consultation are reproduced in full at the end of **Appendix 2** and include:

- An amendment to clarify that Section 106 agreements may include a review clause to account for any subsequent reduction in the number or type of residential units proposed, particularly where changes arise through reserved matters planning applications. The inclusion of such a review clause will be considered on a case-by-case basis;
- Additional wording to improve clarity and transparency regarding the assessment of whether surplus school places can be considered available and taken into account when determining developer contributions, in the context of safe walking routes from a development site to a school. A route is considered to be available if it is safe for a learner without a disability or learning difficulty to walk the route alone or with an accompanying adult if the learners age and levels of understanding require this;
- Minor amendments to clarify the purposes for which education contributions may be used, including the provision and design of new school facilities.

3.5 If adopted, the SPG will support the effective implementation of the existing planning policy framework, provide more detailed advice and guidance to applicants preparing planning applications and will become a material consideration in the determination of planning applications.

4. Equality implications (including Socio-economic Duty and Welsh Language)

4.1 An initial Equality Impact Assessment (EIA) screening has identified that there would be no negative impact on those with one or more of the protected characteristics, on socio-economic disadvantage or the use of the Welsh Language. It is therefore not necessary to carry out a full EIA on this policy or proposal.

5. Well-being of Future Generations (Wales) Act 2015 - implications and connection to Corporate Well-being Objectives

5.1 The new SPG for Educational Facilities and Residential Development will provide additional guidance and material weight to support adopted RLDP Policies and seek to provide clarity in respect of their future interpretation, setting out what the Council expects from applicants in respect of satisfying those policies' detailed criteria. This is a key contributory factor to delivering Local Well-being Objective 3: 'Enabling people to meet their potential.'

5.2 The SPG will also contribute to the following goals within the Well-being of Future Generations (Wales) Act 2015:

- A prosperous Wales – Ensuring there is sufficient education provision in response to new residential development, directly supporting skills, employability and the future workforce.
- A healthier Wales – Ensuring education provision can be accessed by safe walking routes from new housing developments.
- A more equal Wales – Ensuring equal access to education provision, including Welsh-medium and Additional Learning Needs provision.
- A Wales of cohesive communities – Ensuring that education provision is provided in relation to new residential development to avoid pressure on existing schools.

6. Climate Change and Nature Implications

6.1 There are no direct climate change and nature implications from this Report, although the new SPG, once adopted, will provide additional guidance to ensure that existing education provision can be accessed by safe walking routes from new housing developments. This will help to encourage a sustainable modal shift, reducing carbon emissions that are released from car-born travel.

7. Safeguarding and Corporate Parent Implications

7.1 There are no safeguarding and corporate parent implications arising from this Report.

8. Financial Implications

8.1 There are no financial implications arising from this Report.

9. Recommendations

It is recommended that the Development Control Committee:

- a) Note the contents of the Report, the final draft Educational Facilities and Residential Development SPG (**Appendix 1**) and the summary of consultation responses received on the draft Educational Facilities and Residential Development SPG, together with resultant amendments attached as **Appendix 2**;
- b) Note that the final SPG will be reported to Cabinet to seek approval to present the SPG to Council for adoption.

Background documents

None

**Bridgend County Borough
Local Development Plan
2018-2033**

**Draft Educational Facilities & Residential Development
Supplementary Planning Guidance
September 2026**

Cyngor Bwrdeistref Sirol



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1.0 Introduction

- 1.1 The purpose of this supplementary planning guidance (SPG) is to explain in detail the Council's approach to the provision of educational facilities and outlines how the Council will, where appropriate, seek planning obligations to provide or enhance education and school facilities as part of new residential developments throughout the County Borough of Bridgend.
- 1.2 This adopted SPG will be a material consideration in the determination of all planning applications for residential development including applications for renewal of consents.
- 1.3 Anyone wishing to submit an application for residential development within the County Borough is urged to consider this SPG and to contact the Local Planning Authority (LPA) in advance of submitting an application, to discuss the issues that are raised in this document on a site-specific basis.
- 1.4 This SPG provides specific guidance on:
 - Education requirements for residential developments, including thresholds, pupil yields, additional learning needs provision, Welsh medium provision, cost per pupil place, investment in unsatisfactory school accommodation, new schools and how contributions will be used;
 - How contributions are calculated, providing a worked example; and
 - The administration of policy through the various planning stages, Section 106, negotiation with developers and how issues surrounding development viability may be considered.

2.0 Policy and Legislative Context

- 2.1 The National Planning Policy context for the provision of educational facilities through the planning system is set out in Future Wales: the National Plan 2040 and Planning Policy Wales (PPW).
- 2.2 **Well-Being of Future Generations (Wales) Act 2015** is a key piece of legislation which aims to further improve the social, economic, environmental and cultural well-being of Wales now and in the longer term. The Act puts in place a 'sustainable development principle' which is a duty for public bodies to "act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs". The Act is underpinned by seven well-being goals, which public bodies must work to achieve (a prosperous Wales, a resilient Wales, a healthier Wales, an equal Wales, a Wales of cohesive communities, a Wales of vibrant culture and thriving Welsh Language and a globally responsible Wales).
- 2.3 **Future Wales: The National Plan** is the National Policy Framework setting out the direction for development in Wales to 2040. Whilst the plan does not address education facilities specifically, it sets the spatial framework within which local and regional development plans can integrate new education provision, in line with national goals around sustainable growth and community well-being.
- 2.4 **Planning Policy Wales (PPW): Edition 12** states the importance of planning authorities developing a strategic and long-term approach to the provision of community facilities (including schools) when preparing development plans. Community facilities should continue to address the requirements of residents in the area and can contribute to a sense of place which is important to the health, well-being and amenity of local communities and their existence is often a key element in creating viable and sustainable places.

- 2.5 Inclusive Design: PPW emphasises the need for good design and placemaking to be incorporated within all development proposals. Good design should place people at the heart of the design process and must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car.
- 2.6 Infrastructure: Adequate and efficient infrastructure, including services such as education facilities, is crucial for economic, social and environmental sustainability. It underpins economic competitiveness and opportunities for households and businesses to achieve socially and environmentally desirable ways of living and working. Infrastructure which is poorly designed or badly located can exacerbate problems rather than solving them.
- 2.7 Active and Social Linkages: The Active and Social Places of PPW seeks to actively create sustainable and cohesive communities through development plan policies, including specific allocations, and development management decision making. In particular, policies will: enable sustainable access to housing, employment, shopping, education, health, community, leisure and sports facilities and green infrastructure, maximising opportunities for community development and social welfare; It emphasises that when planning and managing future development, planning authorities need to ensure that residents of existing and new communities have access to jobs and an appropriate range of community facilities including recreation, leisure, health and education.
- 2.8 PPW identifies that planning obligations are useful arrangements to overcome obstacles that may otherwise prevent planning permission from being granted. Contributions may be used to offset negative consequences, to help meet local needs, or to secure benefits which will make development more sustainable. It is essential that arrangements are fair to both the developer and community, that the process is transparent as possible, and that development plans provide guidance on the types of obligations that the Council may seek.

2.9 Welsh Government's Sustainable Communities for Learning Programme (SCfL) formerly known as the *21st Century Schools and Education Initiative* is a long-term investment for schools and colleges to develop them as hubs for learning and reduce buildings in poor condition. In January 2022, it adopted the new title SCfL, reflected renewed emphasis on environmental sustainability, community cohesion, and the needs of future generations. The main aims of the programme include:

- 1) Transforming Learning Environments & Learner Experience
- 2) Meeting Demand for School Places
- 3) Improving Condition & Suitability of the Estate
- 4) Developing Sustainable Learning Environments
- 5) Supporting the Community

2.10 The SCfL now includes approximately £2.3 billion in combined capital and revenue investment for education infrastructure, delivered through a more flexible “rolling programme” rather than fixed, multi-year cycles.

2.11 Cwm Taf Morgannwg Public Services Board Well-being Plan 2023-2028

The Well-being Plan (the Plan) outlines how the Public Service Board will work together to deliver the seven wellbeing goals for Wales as referenced in the Wellbeing of Future Generations (Wales) Act. The Plan is framed around tackling inequalities in relation to our lifestyles, our communities, and our environment to improve the well-being for people living here now and building towards a fair future. Two well-being objectives have therefore been developed, which are:

- 1) Healthy Local Neighbourhoods
- 2) Sustainable and Resilient Local Neighbourhoods

2.12 This plan recognises the need to help people to access support, services and opportunities in their local neighbourhood such as community buildings like education facilities.

2.13 **Active Travel (Wales) Act 2013** makes walking and cycling the preferred option for shorter journeys, particularly everyday journeys, such as to and from a workplace or education establishment, or in order to access health, leisure or other services or facilities. The Active Travel Act requires local authorities to identify the walking and cycling routes required to create fully integrated networks for walking and cycling to access work, education, services and facilities.



3.0 Background

- 3.1 Bridgend County Borough Council (BCBC) receives a high number of applications each year for new housing development. These new residents create a demand for school places and as a result, there may be a need for new educational facilities or an improvement to existing provision. In order to ensure communities are not disadvantaged and that there is sufficient and satisfactory educational provision for the children and young people generated by new developments, the Council will, where appropriate, seek contributions towards providing or enhancing educational facilities. To meet this demand Policy SP10 of the RLDP requires the provision of educational facilities and/or their upgrades.
- 3.2 The Council urges anyone intending to submit an application for residential development within the County Borough to read this SPG. To discuss any issues on a site-specific basis they may contact BCBC in advance of making a planning application for pre-application discussions (see Section 7 at the end of the SPG).



Pentcoed Primary School

Bridgend Local Development Plan 2018-2033

Draft Educational Facilities & Residential Development Supplementary Planning Guidance

4.0 Education Provision

4.1 **Corporate Plan and Education and Family Support Directorate Plan 2023-2028** sets out the Council's priorities and how the Council will work alongside local people and partners to provide services over the next five years.

- A County Borough where we protect our most vulnerable
- A County Borough with fair work, skilled, high quality jobs and thriving towns
- A County Borough with thriving valleys communities
- A County Borough where we help people meet their potential
- A County Borough that is responding to the climate and nature emergency
- A County Borough where people feel valued, heard and part of their community
- A County Borough where we support people to live healthy and happy lives

4.2 Education contributions secured through Section 106 will specifically support the fourth objective. The importance of delivering this objective is also detailed within the Education and Family Support Directorate Plan.

4.3 **Education and Family Support Directorate Plan** identifies the directorate's priorities and commitments, the contribution the directorate will make in the Corporate Plan, and how this will be measured.

4.4 **School Modernisation** – BCBC has embarked on a challenging programme of school modernisation across the County Borough. Creating schools that are fit-for-purpose and valued by their communities is one of the Council's major priorities, as outlined in the Corporate Plan. Throughout the modernisation process, discussions are being held with learners, schools and their communities. Consideration is being given to the circumstances of each school with the best long-term interests of the children and young people in its locality

being the priority while ensuring the current quality of education is maintained. Using the most up-to-date information held by the Council, the effects of the School Modernisation Plan on schools in the vicinity of new residential development will be taken into account at the planning application stage and this will form part of the negotiation process at that time.

- 4.5 **School Catchment Areas** – All primary and secondary schools have geographical catchment areas that are used to administer admission arrangements. Out of the 60 Schools throughout the County Borough, there are 5 Welsh medium schools, 5 voluntary aided, 1 voluntary controlled, 2 special schools and there is 1 pupil referral unit. Due to the reduced number, and therefore more sparsely located nature of schools such as Welsh medium schools and special schools, they have wider catchment areas.
- 4.6 It should be noted that the defined catchment areas for schools are sometimes subject to review and the Council recommends that the developer contacts the Council prior to the submission of a planning application to ascertain the most up-to-date catchment information.
- 4.7 In order to make effective use of future contributions, the terms of any future Section 106 agreement should allow for the fact that school catchment areas change and that contributions can be utilised for education facilities within any subsequent school's catchment area within which the development falls at the time of implementation.
- 4.8 **School Capacity** – Welsh Government's Circular No. 021/2011 'Measuring the Capacity of Schools in Wales' describes the method of assessing the capacity of primary and secondary schools and deriving appropriate admission numbers from the capacity. Local Authorities in Wales are required to set pupil admission numbers (the PAN) based on this methodology as part of their annual determination of admission arrangements for the schools.

- 4.9 The Council holds up-to-date information relating to the capacities of each school, which will be used to determine whether a surplus or deficit in available capacity exists for schools by catchment area. Where a development is likely to place pressure on the existing capacity of schools in a catchment, the Council will seek to negotiate an agreed financial contribution towards the provision of additional school places or facilities.
- 4.10 It is necessary to retain some spare places to enable schools to cope with fluctuations in numbers of pupils in particular year groups. This allows for preference and demand volatility (e.g. year-on-year changes in the birth rate, parental choice etc.). **The level of spare places needed to be retained at schools is unlikely to exceed 10%. Any school which has achieved 90% occupancy would therefore be regarded as having no surplus capacity.**
- 4.11 **School Standards** – Each school has been assessed in terms of any significant investment that is required to bring it up to a satisfactory standard. The Council holds information in connection with the suitability, sufficiency and condition of school buildings throughout the county borough. The standard of school buildings / facilities is a valid consideration for this SPG and Section 106 negotiations as additional numbers of pupils generated by new development could exacerbate arrangements to such an extent that the individual school would not be suitable to accommodate additional pupils. Circumstances are likely to differ significantly between schools depending on their configuration, layout, facilities and use of internal space that may need to be brought back into beneficial use to accommodate new pupils.
- 4.12 The Education (School Premises) Regulations 1999 describe and advises on meeting the minimum standards for the premises of all maintained schools in Wales. The Regulations set minimum standards for all existing and new maintained schools in Wales and they require that the premises of non-maintained special schools, and approved independent schools suitable for the admission of children who have special educational needs conform to some of the standards contained within them. The surveys undertaken by the Council

are based on the above guidance. Current guidance such as Building Bulletins, are also consulted.



5.0 Developer Contributions

5.1 Thresholds

5.2 Residential developments large enough to place increased pressure on the educational facilities within whose catchment area the development is located will result in the Council seeking an appropriate level of contribution from the developer to accommodate the additional places or bring existing floorspace up to a satisfactory standard.

5.3 Contributions for educational facilities will be sought from all proposed developments with a net gain of 5 or more residential units. In the case of flats or apartments contributions will be required for 15 or more eligible units (i.e. 1 bedroom flats would be excluded from the total number of units).

5.4 Contributions will be sought where:-

- a) The pupils potentially arising from the development will cause the surplus capacity of local schools within the catchment area to be exceeded; or
- b) Existing surplus capacity exists to accommodate some or all of the pupils potentially arising from the development, but refurbishment is required to make those places 'fit for use'.

5.5 The only forms of accommodation that will be exempt from contributions are bedsits, 1-bed dwellings, sheltered or elderly accommodation, houses in multiple occupation, hotels, hostels and student accommodation (including residential schools, colleges or training centres).

5.6 Each residential development exceeding the above thresholds will be assessed to determine how many children and young people are likely to be generated from that development and its potential demand and impact on local schools and education facilities.

5.7 Pupil Yields

- 5.8 The number of children and young people that will be generated by a proposed housing development is based on the following pupil yield factors:

Table 1: Number of children generated per dwelling

Age Group	Number of Children Generated per Dwelling	
	Apartments	Houses
Nursery (under 4)	0.02	0.05
Primary (4-11)	0.10	0.33
Secondary (11-16)	0.06	0.21
Post 16	0.18 x secondary	0.18 x secondary
ALN* – Primary	1.5% of primary	1.5% of primary
ALN* - Secondary	1.5% of secondary	1.5% of secondary

* ALN = Additional Learning Needs

- 5.9 The pupil yield numbers above are based on the actual take up of school places from completed new build housing developments in the borough, which include the provision of a new Primary School.
- 5.10 The number of pupils generated by a proposed development will be rounded up or down to the nearest whole pupil, and will be assessed against the capacity of the school(s) in whose catchment area(s) the new housing development is proposed. The Council will take account of the number of pupils on the school roll (NOR) to assess whether any surplus capacity exists within the development catchment(s).
- 5.11 Net pupil places required above projected capacity are then calculated by offsetting a developments projected pupil yield against any existing school place surplus. The figures used to calculate the school numbers will be made available to developers as part of the justification for requesting a financial contribution.

5.12 Safe Walking Routes

5.13 Notwithstanding para. 5.11, any surplus school capacity within the development catchment(s) must also be considered in the context of Safe Walking Routes (A route is considered to be available if it is safe for a learner without a disability or learning difficulty to walk the route alone or with an accompanying adult if the learners age and levels of understanding requires this) before assuming that capacity can offset a development's projected pupil yield. The local authority will only accept the use of surplus places within a relevant catchment area, where the following criteria is met:

- 1) The distance from the development to the school(s) is within the national statutory distances of two miles for primary school pupils and three miles for secondary school pupils; and
- 2) The journey from the development to the school(s) is served with an available walking route, as defined by the local authority (as per the Learner Travel Statutory Provision and Operational Guidance – See Appendix A for further guidance).

5.14 If the local authority has not assessed the route from the development to the relevant schools with surplus places, the onus will be on the developer to demonstrate under the Learner Travel Statutory Provision and Operational Guidance, that the route can be considered 'available'. This could be incorporated within a transport assessment or other supporting information submitted with a planning application.

5.15 Additional Learning Needs (ALN) Provision

5.16 Additional Learning Needs pupils are those taught in either a special school or in a specialist facility on the site of a mainstream school.

5.17 Welsh-Medium Provision

5.18 An evaluation of different educational settings (i.e. English-medium, Welsh-medium, faith and voluntary aided schools) is undertaken on historical take up of places in the catchment and how place availability would drive parental choice. The Local Education Authority will determine if contributions will be used for Welsh or English-medium school places, which will be subject to a separate process outside of any planning application.

5.19 Costs per Pupil Place

5.20 The costs per pupil place are based upon Welsh Government standardised size and costs for new build schools under the Sustainable Communities for Learning programme.

Table 2: Cost per Pupil Place

Year Group	Cost per Pupil Place
Nursery	£25,009
Primary	£25,009
Secondary	£36,318
Post 16	£36,318
ALN – Primary	£75,027
ALN – Secondary	£108,954

5.21 The figures above have been tested against the costs of recently completed new school construction projects and will be regularly reviewed to reflect changes in school building costs. 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.

5.22 The Welsh Government's standardised costs are based on the area in a school building required per pupil, according to the maximum size range of Building

Bulletins 98 and 99 for secondary and primary pupils respectively. Once the size is established, costs are applied which account for the following elements:

- Standard build costs (includes sub structure, externals and design costs);
- Furniture, fittings and equipment; and
- ICT

5.23 The costs do not include abnormal build costs associated with gradients, contamination, flood protection works or any associated highway works outside the school boundary.

5.24 Investment in Unsatisfactory School Accommodation

5.25 In circumstances where a school does have the capacity with regards to floor space, but the space is considered to be of an unsatisfactory standard to accommodate additional pupils created by a development and would require investment to make it suitable, the costs of bringing this floor space up to standard will be based on 65% of the cost of providing a new additional space.

5.26 New Schools

5.27 Where large scale development generates sufficient pupil numbers to justify a new primary or secondary school, there will be a requirement on developers to provide this within the development. If not physically possible to accommodate the facility on site, the developer will be required to make an equivalent financial contribution (e.g. land value and building costs) towards its off-site provision.

5.28 Use of Contributions

5.29 The Council will seek contributions for all age groups for all maintained schools where the need arises. Contributions may be used for:

- provision of new schools;

- design of new schools in accordance with the [Area Guidelines for Schools in Wales – Building Guidance](#), which sets out requirements for high-quality, inclusive and sustainable learning environments, including appropriate outdoor learning and play spaces, accessibility, wellbeing and environmental sustainability;
- provision of new classrooms;
- improvements and refurbishment of existing facilities to provide additional capacity;
- provision of additional resources or improvements to existing resources necessitated by the additional demand;
- provision of any necessary interim school measures which, in some circumstances, might be required when it is not possible to ensure that permanent measures will be in place on time.

6.0 Calculating the Requirement

6.1 Contribution formula

- 6.2 Using this guidance the calculations towards providing additional places or investment required to make the school suitable for additional pupils will be worked out using the following formula:

$$\begin{aligned} & (\text{Number of dwellings} \times \text{Number of children generated per dwelling}) \\ & \quad \times \\ & \quad \text{Cost per pupil place} \\ & \quad + \\ & \quad \text{Any additional related costs*} \\ & \quad = \\ & \text{Total cost of providing school places or investment required to make the} \\ & \text{school suitable to accommodate additional pupils} \end{aligned}$$

*See Appendix 1 for an indication of potential additional costs

6.3 Worked Example

- 6.4 The following is a worked example using the formula above for a development of 500 houses in an area with no surplus Primary School capacity:

Number of dwellings = 500

Number of primary aged children generated by each dwelling = 0.33

Number of primary aged ALN children = 1.5% of total

Cost per pupil place = £25,009

Cost per ALN pupil place = £75,027

$500 \times 0.33 = 165$ pupils

$165 \times 1.5\% \text{ (ALN)} = 2.47$ (rounded down to 2)

$165 - 2 = 163$ pupils and 2 ALN pupils

$163 \times £25,009 = £4,076,467$

$2 \times £75,027 = £150,054$

Total Contribution = £4,226,521



7.0 Administration of the Policy

7.1 Implementation of the Policy

7.2 The implementation of the SPG strategy operates through a number of procedures which are broadly as follows:

7.3 Pre-Application Stage

7.4 Prospective applicants for housing developments are strongly advised to contact the Council's Planning Department prior to submitting a planning application. Amongst other matters, this will enable an officer from the Strategic Planning section to liaise with the Education, Early Years and Young People Directorate and outline the anticipated Council's requirements relating to education and other Section 106 contributions. This is to ensure that any anticipated costs relating to provision of education facilities are highlighted prior to, or during, the developer's initial site evaluation exercise.

7.5 Application Stage

7.6 Should pre-application discussions not take place, applicants for housing developments will be informed of the requirements for the provision of education facilities following the submission of a planning application. Should a housing development trigger the threshold for a contribution, an applicant will be required to enter into a Section 106 legal agreement with the Council to ensure a contribution is made towards education facilities. A clause will be included within the Section 106 agreement to assess the available capacity at the point the obligation is triggered, ensuring that the required mitigation is accurately aligned with conditions at that time.

7.7 As part of any request for a planning obligation, an applicant will be provided with:

- The number of children potentially arising from the development.
- The capacity of the relevant local schools and the existing number of pupils on the school roll.
- The amount of financial contribution that will be required to create additional school places.

7.8 Section 106 Agreements

7.9 Section 106 of the Town and Country Planning Act (TCPA) 1990, as amended by Section 12 of the Planning and Compensation Act (1991), and the Community Infrastructure Levy Regulations 2010 (as amended), is the legislative framework for planning obligations. Any obligation must meet the following three tests:

- 1) Necessary to make the development acceptable in planning terms;
- 2) Directly related to the development; and
- 3) Fairly and reasonably related in scale and kind to the development.

7.10 Furthermore, it should be noted that the CIL Regulations (Regulation 123) restricts the pooling of Section 106 contributions. Regulation 123 states a Section 106 obligation cannot constitute a reason for granting planning permission if five or more separate planning obligations already exist for a specific single infrastructure project (entered into since 6th April 2010). The Council keeps up to date records of all Section 106 agreements entered onto the Planning Register. In discussions with developers, the Council will consider whether the pooling restriction is relevant and seek to ensure that the development can be appropriately mitigated through planning obligations, whilst ensuring that the pooling restriction is not breached. If a development is not capable of delivering appropriate infrastructure because of the pooling restriction, this may make it unacceptable in planning terms.

7.11 Given the uncertainty regarding the future of the Community Infrastructure Levy Regulations 2010 (as amended) and the devolved powers Welsh Government

inherited to modify existing secondary legislation in April 2018, the Council has agreed that progress on CIL is to be placed into abeyance until there is a clear direction from Welsh Government. In the meantime, the Council will continue to use planning obligations secured through Section 106 agreements to secure necessary infrastructure.

7.12 Site Extensions

7.13 In cases where a greater number of dwellings are proposed than originally allocated, additional contributions will be required and secured through subsequent reserved matters applications. Alternatively, a review clause may be incorporated into the wording of a Section 106 agreement to account for any increase or reduction in the number or type of units proposed. The need to include a review clause within a Section 106 agreement will be considered on a case-by-case basis.

7.14 Negotiations with Developers

7.15 Negotiations with developers on planning agreements will include:

- the project(s) to which their contributions may be used;
- the timing of the payment of agreed contributions; on large sites payments may be phased by agreement with the authority;
- when contributions will be spent; this will normally be within 5 years of receipt of the final payment.

7.16 In order to make effective use of future contributions, the terms of any future Section 106 agreement should allow for the fact that school catchment areas change and that contributions can be utilised for education facilities within any subsequent school's catchment area within which the development falls at the time of implementation.

7.17 Development Viability

- 7.18 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. Appropriate supporting evidence must be provided to substantiate any such claim, and this evidence must be comprehensive. For example, it would not be acceptable to solely highlight a change in one variable (such as build costs), without clearly evidencing how other variables (such as house prices), may have also changed. A comprehensive viability appraisal must therefore be provided, with all inputs and assumptions being robustly evidenced. Unsubstantiated commentary will not be acceptable.
- 7.19 Applicants must robustly demonstrate any site-specific constraints, abnormal costs and/or other viability challenges that could necessitate a deviation. The LPA will work collaboratively with developers in such instances to evaluate site-specific evidence. The LPA reserves the right to reject any development viability claims without comprehensive supporting evidence being provided.
- 7.20 In all cases, it is recognised that some information necessary to demonstrate viability may be commercially sensitive. However, this is not a sufficient reason to avoid providing the appropriate evidence to the LPA and this information will be used solely to consider whether any deviation from this SPG is justifiable.
- 7.21 There is a common viability appraisal model in use across the South East Wales Region known as the Burrows-Hutchinson Ltd Development Viability Model (DVM). The DVM has been created as a comprehensive, user-friendly model to assess the financial viability of development proposals. The LPA is able to make the DVM available to applicants to appraise the financial viability of a proposed development and demonstrate any necessary deviation from the requirements of the SPG. The primary inputs required to undertake a financial viability appraisal through the DVM are provided in Appendix B.

7.22 The DVM and user guide can be released to any applicant subject to the LPA receiving payment of a standard fee (set out in the Council's latest Fees and Charges Schedule). The fee is intended to cover the LPA's administrative costs of locking and distributing the model, verifying the completed appraisal and providing a high-level review to the applicant. However, payment of a fee will not guarantee that a reduced education contribution will be deemed acceptable or directly result in the granting of planning permission. The fee will only enable the LPA to consider whether:

- a) the DVM has been completed correctly and appropriately;
- b) the evidence supplied to support the costs and values submitted is sufficient and proportionate;
- c) the suggested timescales for the development are realistic; and
- d) the appraisal accords with policy requirements of the RLDP and with other guidance and/or policy statements that are pertinent to the assessment of viability in a planning context.

7.23 The preliminary fee does not allow for any further time that an applicant might wish to spend debating the findings of the LPA's initial high-level review. It also does not allow for any officer time necessary to re-appraise subsequent submissions of the model and supporting evidence, which will be rechargeable. Alternative viability models can be used subject to prior agreement with the LPA. In the event of any unresolvable disputes, the LPA may need to draw upon expertise from a third party to act as an independent arbitrator. The costs associated with this must be met by the developer/applicant. For larger sites (of several hundred units), mixed-use developments or sites of a strategic scale, it may be more appropriate for an applicant to commission an independent arbitrator from the outset, following discussion with the LPA.

7.24 Irrespective of the outcome of a viability appraisal, it may be necessary for the Council to secure a certain level of developer contributions, in order to mitigate the impact of the development. Such a circumstance could be where a failure to make some provision for certain infrastructure items would make the

development unacceptable in planning terms, contrary to policy and an unacceptable burden. This will be assessed on a case-by-case basis. In such circumstances, failure to secure the contributions, deemed necessary to support the proposal, could result in a recommendation of refusal.

7.25 Planning Appeal Decisions

7.26 If an appeal is made for reasons other than the provision of an education contribution, the applicant should ensure that an appropriately worded Unilateral Undertaking is signed prior to the determination of any appeal, to make provision for the appropriate contribution. Failure to provide such an undertaking would be likely to result in the Council making an objection on education capacity grounds at appeal.

Appendix A – Safe Walking Routes to Schools

1.1 Local authorities are under a legal duty to assess the travel needs of learners who walk to school. In making an assessment, local authorities must take into account the following physical route provisions by law:

- Route conditions;
- Traffic;
- Traffic flow on roads;
- Collision history;
- Footpaths;
- Crossing points;
- Canals, rivers, ditches and embankments;
- Lighting;
- Planned changes in the area; and
- Level crossings.

1.2 The intent of the guidance is to ensure that the relationship between learners and traffic is considered by the local authority in making a judgement as to whether the route they are to travel, is available (safe) to walk. It is important therefore that for any new development, pedestrian routes are adequate and meet the physical requirements outlined in the Statutory Provision and Operational Guidance. Particular consideration should be given (but not limited to) the following:

- The provision of continuous adequate footways
- Adequate street lighting
- Adequate sight lines
- Pedestrian refuges where necessary
- Adequate visibility
- Traffic flow and sight lines to allow enough opportunities to cross safely
- Sufficient crossing facilities (for example, zebra, pelican crossings)

- Sufficient pedestrian phases at traffic lights (including necessary refuges)

1.3 A local authority cannot automatically consider a route to be available on the basis it meets some or all of these physical requirements. The local authority will also need to consider any social danger associated with the route, which is also required under the operational guidance. The local authority will also need to consult and consider the views of learners as well as parents/carers in its assessment of the availability of a walked route to school.

1.4 Therefore, developers should ensure that for any new developments, the local authority is able to consider positively associated pedestrian routes, in line with the physical route requirements summarised above, but detailed more comprehensively in the aforementioned Learner Travel Statutory Provision and Operational Guidance.

Appendix B – Additional Related Costs

1.1 Potential Additional Related Costs include the following:

- Land acquisition
- Associated infrastructure requirements (e.g. major highway infrastructure or excessive ground levelling requirements)
- Temporary accommodation
- Initial cost of school transportation for up to 3 years (whilst new accommodation is being built)
- Building regulations
- Preliminary site investigations

1.2 The above highlights those additional related costs referred to that may be necessarily incurred, and which may form part of the contributions sought from the developer by the Council.

Appendix C – Data Inputs Required for Financial Viability Appraisals

- 1) List of open market dwelling types, specifying for each one:
 - a) Number of bedrooms
 - b) Number of habitable rooms
 - c) Gross/net internal floor areas
 - d) Estimated open market value (freehold selling price) with supporting evidence
 - e) Total number of each dwelling type within the proposed development
- 2) List of affordable dwelling types, specifying for each one:
 - a) Number of bedrooms
 - b) Number of habitable rooms
 - c) Gross/net internal floor areas
 - d) Estimated open market value (unrestricted freehold selling price) for intermediate dwellings
 - e) Transfer values for social rented dwellings
 - f) Total number of each dwelling type within the proposed development
- 3) Site layout plan for the development (outline, or detailed if available) with net developable areas and dwelling numbers for each element/phase of the proposed development.
- 4) Estimated construction and sales programmes for the development.
- 5) Details of current land ownership or details of the contractual terms and stage of transaction reached for its acquisition by the developer. This must include the land price paid (or, if estimated and not yet paid, the basis for that estimate) and allowance made for acquisition fees and Land Transaction Tax.
- 6) Planning costs and anticipated period before commencement of development (in months) after land acquisition has been completed.
- 7) Housing construction costs (plot costs), as a total sum or £/m², noting any additional allowance made for achieving compliance with forthcoming building regulations. Evidence must be provided to justify what these costs are based on.
- 8) Physical infrastructure costs, broken down between:
 - a) Off-site drainage, highway and/or other works, with detailed analysis/justification
 - b) Normal on-site costs for providing road access and services to individual plots (including “externals” such as detached garaging and landscaping, which may be assessed on a fixed average sum per dwelling, or as a percentage of plot

- costs)
 - c) Abnormal site costs (if any) with detailed analysis/justification
- 9) Allowance made for professional fees in connection with:
- a) Planning and building regulations approvals
 - b) Housing construction costs
 - c) Physical infrastructure works
- 10) Estimated sum (or percentage allowance) for contingencies
- 11) Section 106 contributions necessary to achieve full RLDP policy compliance and anticipated timing of payments
- 12) Sale and marketing costs for open market dwellings
- 13) Finance costs, including interest rate(s) applied, and the basis for their calculation
- 14) Details of any proposed non-residential uses, including gross external and net internal floor areas, together with estimated costs and revenues associated with those parts of the development. This will include, where available, estimated freehold and rental values for each element/unit, the investment yield(s) on which estimated freehold values have been based/calculated, and details of any pre-lets or forward sale arrangements.

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Appendix 2: Consultation Representations, Responses and Resultant Action

Do you have any comments on the proposed thresholds in Section 5?	
Organisation	Planning consultant acting on behalf of a housebuilder
Representation	It is recognised that proposed development at strategic sites would clearly exceed the thresholds set out in Section 5 and would therefore be expected to contribute towards education provision. In principle, this is accepted, and it is acknowledged that developments of this scale will generate a need for additional school places. However, concern is raised not with the principle of the threshold, but rather its operation in practice when applied to large, phased developments. For example, strategic sites make provision for on-site education infrastructure, including the safeguarding of land for a new primary school. The SPG does not clearly set out how such on-site provision is to be taken into account when calculating financial contributions. This creates a lack of clarity as to whether, and to what extent, the provision of land and associated infrastructure will offset or reduce the requirement for standardised financial contributions. In this context, it is considered unreasonable to apply standard “per pupil” capital cost contribution, which are primarily intended to fund incremental expansions to existing schools, to developments that are already required to make a significant on-site contribution through the provision of serviced land and the integration of education facilities within the masterplan. In the absence of a clear mechanism to offset these contributions, there is a real risk of double counting, whereby developers are required to both provide land for a new school and pay full financial contributions towards pupil places. This would result in a disproportionate and unjustified financial burden. The SPG should therefore include explicit provisions to address how in-kind contributions, such as the provision of land and associated infrastructure for a new school, will be factored into the overall

	contribution requirement. This should include a clear and transparent methodology for offsetting land value and infrastructure costs against any financial contributions sought. Without such clarity, there is a risk that the policy will be applied inconsistently and in a manner that undermines development viability. In summary, whilst the threshold approach is understood, it does not adequately account for the specific circumstances of large strategic developments. The SPG should be revised to ensure that on-site provision is properly recognised and that contributions are applied in a fair, proportionate and transparent manner, avoiding the risk of double counting and supporting the deliverability of key strategic sites.
Local Planning Authority Response	Since the existing SPG was adopted in 2021, construction costs have risen significantly. Accordingly, the cost multipliers have been updated to reflect the latest Welsh Government Cost and Size Standards, published in 2023, using the applicable 2026 rates. The Welsh Government Costs Standards apply standardised cost benchmarks to as many elements of school construction as possible. These benchmarks include, but are not limited to: • Construction cost per m²; • Furniture, fitting and equipment price per pupil/pupil/student; • ICT price per pupil/student. However, the cost standards do not account for land acquisition costs or the costs associated with providing utility services to the site boundary. As these costs are excluded from the cost's multipliers, the methodology avoids double counting where developer contributions are required in addition to the provision of serviced land.
Resultant Action	No action required.
Do you have any comments on the proposed pupil yields in Section 5.7?	
Organisation	Planning consultant acting on behalf of a housebuilder

Representation	A strong objection is maintained to the proposed pupil yield assumptions set out within Section 5.7. The SPG continues to apply a blanket yield of 0.33 for primary school pupils and 0.21 for secondary school pupils per dwelling. Whilst the Council states that these figures are based on the actual take-up of school places from completed developments within the Borough, the evidence base underpinning this approach remains unclear and insufficiently robust. No detailed information is provided regarding the number or type of developments analysed, nor whether the data reflects a representative range of dwelling sizes, tenures or locations. The apparent reliance on a limited dataset, potentially including a single development, is not an appropriate basis upon which to establish borough-wide planning assumptions. This is particularly concerning given the significant pupil yield compared to neighbouring authorities, which has not been convincingly justified. It is widely recognised that pupil yield varies considerably depending on dwelling size and household composition. Larger family homes typically generate higher numbers of school-aged children, whereas smaller units such as two-bedroom dwellings generate significantly lower yields. The application of a single average yield across all house types fails to reflect this fundamental relationship and results in an overestimation of demand in many cases. This issue is particularly relevant to the proposed strategic allocations, where a broad mix of housing is intended to be delivered, including a substantial proportion of two and three-bedroom dwellings. Applying a blanket primary yield of 0.33 per house assumes that all units perform at a level equivalent to larger family homes, which is neither realistic nor supported by evidence. As a result, the approach leads to inflated education contributions that are not proportionate to the likely impact viability of the development. Other local authorities have adopted different, more evidence-based methodologies. In Cardiff, for example, pupil yields are calculated based on the number of bedrooms within a dwelling, with
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	significantly lower yields applied to smaller units and higher yields applied to larger dwellings. Notably, even the highest yields applied in Cardiff are lower than the blanket figures proposed within this SPG. This highlights a clear discrepancy and suggests that the current approach in Bridgend is overly simplistic and potentially excessive. In light of the above, it is considered that the Council should undertake a more comprehensive and transparent evidence-based assessment of pupil yields, drawing on a wider range of data sources including Census information, school roll data and multiple housing developments. A differentiated approach based on dwelling size should be adopted to ensure that contributions are fair, proportionate and reflective of actual demand.
Local Planning Authority Response	The consultee's comments are noted. Pupil yield rates within the existing SPG were based on the actual uptake of school places from a completed residential development within the borough, which included the provision of a new primary school at Broadlands. Yield rates were calculated separately for each academic year including nursery, primary, secondary and post-16, by dividing the number of pupils in each provision by the overall development population. This methodology was previously challenged by developers, specifically due to the over reliance on a single completed development to inform pupil yield assumptions. As part of this review, the robustness of the pupil yield evidence base has been strengthened through the reassessment of school uptake at Broadlands, alongside the inclusion of data from a second completed housing development, Parc Derwen, which was not fully complete at the time of the previous review. Both developments included the provision of an on-site primary school and comprise a broad mix of dwelling types, including one, two, three, four and five-bedroom homes. To determine the pupil yield arising from the two developments, an exercise was undertaken that involved interrogating post codes to identify the number of pupils (on roll) arising from the individual housing developments. This data provided a breakdown of the number of pupils within each academic

year. Average pupil yield rates for each education provision were then calculated separately for both housing developments by dividing the number of pupils within each education provision by the total population of each development.

The generated pupil yield rates were analysed in detail through a comparative assessment of the demographic profiles of the two developments. Officers' analysis indicated that new housing developments are likely to generate a demographic profile more closely aligned with Parc Derwen, which, as a recently completed site, has a higher proportion of younger families and therefore greater demand for nursery and primary education provision. In contrast, Broadlands represents a more established and settled community, with lower demand in the early years' provisions and comparatively higher levels of secondary and post-16 pupils, reflecting the progression of children into older education provisions as the development has matured. These differences are clearly reflected in the respective school place uptake data for each development.

In order to ensure that the pupil yields rates were more representative of a new housing development, the methodology applied a weighted average between the Broadlands and Parc Derwen pupil yield rates for each education provision, with a 75% weighting applied to Parc Derwen deemed to better reflect the anticipated demographic profile of future residential developments.

Several alternative approaches were explored, including census data in addition to calculating pupil yields based on the number of bedrooms within each dwelling. However, these methods were discounted due to the absence of sufficiently robust evidence.

There are several limitations associated with using census data to derive pupil yield assumptions for new residential developments. Firstly, census data identifies the number of school-aged children residing within an area but does not identify which schools those children actually attend, meaning that some pupils may attend schools outside the local authority area. Secondly, the data reflects the

	demographic characteristics of existing housing stock rather than the pupil yield generated when new homes are first occupied. This is significant because existing housing may have a different demographic profile to new residential developments as aforementioned, which typically attract a higher proportion of young families during the initial occupation period. Finally, reliance on the 2021 Census should be treated with caution, as the data was collected during the COVID-19 pandemic when population movements, household composition and educational attendance patterns were atypical, potentially affecting its representativeness for forecasting pupil yields from new development. Instead, the Council's methodology is based on evidence derived from actual pupil numbers generated by completed residential developments. This approach captures how new developments are occupied by families in practice, reflects the characteristics of new housing rather than existing housing stock, and uses actual pupils associated with actual developments to provide a more direct measure of education demand arising from new housing. It therefore provides a robust, locally derived evidence base that is more representative of the types of development likely to come forward across Bridgend, including large strategic sites where new schools are delivered as part of the development. As such, the Council considers this to be a more reliable and proportionate basis for forecasting pupil yields and planning future education infrastructure. Furthermore, adopting an approach that calculates pupil yields based on the number of bedrooms would present significant practical and data protection challenges. Establishing robust, property specific pupil yield rates would require access to highly granular data linking pupils' home addresses to the size and number of bedrooms within individual properties. Such data is not readily available and would be difficult to compile accurately. Moreover, the collection, and use of address-level pupil data would raise significant data protection and GDPR compliance concerns. Consequently, it is not considered to be a practical or proportionate methodology for deriving pupil yield assumptions.
Resultant Action	No action required.

Do you have any comments on the proposed cost per pupil place figures in Section 5?

Organisation	Planning consultant acting on behalf of a housebuilder
Representation	The proposed increases in cost per pupil place represent a significant uplift from previous figures and raise substantial concerns regarding both their justification and their cumulative impact on development viability. The SPG indicates that these figures are based on Welsh Government standardised costs and recent school construction project, however, there is limited transparency regarding how these costs have been derived or applied within the local context. As demonstrated in Table 1.1, the scale of the increases is considerable. For example, the cost per pupil place for nursery and primary education has increased from £18,599 in 2021 to £25,009 in the draft SPG, representing an increase of approximately 34.47%. Similarly, secondary and post-16 costs have risen from £29,406 to £36,318, an increase of approximately 23.51%. The uplift in costs for Additional Learning Needs (ALN) provision is also substantial, with primary ALN costs increasing from £55,797 to £75,027 (34.46%) and secondary ALN costs increasing from £88,218 to £108,954 (23.51%). When these figures are compared with those applied by neighbouring authorities, further concerns arise. For example, Cardiff's Education SPG, updated in 2023 cost per pupil place is £19,855 for primary education and £32,798 for secondary education, both of which are notably lower than the figures proposed within this SPG. This disparity raises questions regarding the consistency and proportionality of the proposed costs and whether they accurately reflect local delivery conditions. The magnitude of these increases, when combined with the elevated pupil yield assumptions, results in a very significant escalation in overall education contributions. This has direct implications for development viability, particularly for large strategic sites where the cumulative cost burden is already substantial.

Table 1.1 Comparison of Cost per Pupil Place (Adopted vs Draft SPG)

Year group	Cost Per Pupil Adopted	Cost Per Pupil Draft	% increase
Nursery	£18,599	£25,009	34.47%
Primary	£18,599	£25,009	34.47%
Secondary	£29,406	£36,318	23.51%
Post 16	£29,406	£36,318	23.51%
ALN - Primary	£55,797	£75,027	34.46%
ALN - Secondary	£88,218	£108,954	23.51%

Local Planning Authority Response

Since the existing SPG was adopted in 2021, construction costs have risen significantly. Cost multipliers have therefore been revised to reflect Welsh Government's Size and Cost Standards published in 2023, using the 2026 rates for this purpose. To ensure the SPG remains current and effective over the longer term, these costs will be reviewed and updated annually in line with indexation.

The cost calculations for each type of education provision (excluding Additional Learning Needs (ALN)) are based on multiplying the size (m²) of a representative school, by the 2026 construction cost rate (£/m²) contained within Welsh Government's Cost and Size Standards.

For clarity, the calculations are as follows:

Nursery and Primary Provision

A school size of 1,364m² was selected, representing a 1-form entry primary school with nursery (225 places - 210 primary plus 15 nursery). A construction cost rate of £3,768m² was applied in accordance with the cost standards.

Calculation:

$$1,364\text{m}^2 \times £3,768\text{m}^2 = £5,139,552$$

$$£5,139,552 / 225 = £22,842 \text{ per pupil.}$$

Furniture, Fixtures and Equipment (FFE) and Information Technology (IT): £2,167

Total cost multiplier = £25,009 per pupil.

Secondary and Post-16 Provision

A school size of 5,974m² was selected, representing a 4-form entry secondary school (600 secondary). A construction cost rate of £3,430m² was applied in accordance with the costs standards.

	Calculation: $5,974\text{m}^2 \times \text{£}3,430\text{m}^2 = \text{£}20,490,820$ $\text{£}20,490,820 / 600 = \text{£}34,151$ per pupil. FFE and IT: $\text{£}2,167$ per pupil. Total cost multiplier = $\text{£}36,318$ per pupil. <u>ALN Provision</u> The cost multiplier for ALN provision is calculated by applying a factor of three to the standard primary and secondary cost multipliers respectively. This reflects the higher costs associated with specialist provision, including the need for smaller teaching areas. This approach is consistent with the space requirements set out on page 81 of Welsh Government's Area guidelines for Schools in Wales: Building Guidance. While it is recognised the representor has referenced lower rates in other SPGs, those rates pre-date the more recent data upon which the Bridgend SPG is based upon.
Resultant Action	No action required.
Do you have any additional comments to make regarding Section 5?	
Organisation	Planning consultant acting on behalf of a housebuilder

Representation	A further concern in relation to Section 5 is that the SPG lacks any clearly defined mechanism to adjust or scale education contributions where the quantum of development changes over time. For large, strategic and phased sites, it is common for housing numbers to evolve through the planning process in response to a range of factors, including design considerations. In its current form, the SPG does not provide clarity on how obligations would be recalculated in circumstances where the total number of dwellings is reduced, thus creating uncertainty. Without a clear mechanism for adjustment, there is a risk that contributions could be fixed at a level that does not reflect the true scale and impact of the development, resulting in disproportionate obligations and potentially threatening viability. It is considered essential that the SPG incorporates a flexible approach to recalculating contributions in line with any changes to the number or type of units. In the absence of such flexibility, the SPG risks imposing rigid requirements that do not respond to changing circumstances, which could ultimately hinder delivery and undermine viability.
Local Planning Authority Response	Comments noted. A review clause may be incorporated into the wording of s106 agreements to account for any reduction in the number or type of units proposed. The need to include a review clause within s106 agreements will be considered on a case-by-case basis.
Resultant Action	Paragraph 7.13 will be amended to clarify that a review clause may be incorporated into the wording of s106 agreements to account for any reduction in the number or type of units proposed.
Do you have any comments to make regarding Section 7 and the administration of the policy?	
Organisation	Planning consultant acting on behalf of a housebuilder
Representation	It is acknowledged the provisions set out within Section 7, however there are concerns regarding the practical application of the policy, particularly in relation to viability and engagement. The SPG places

	a significant evidential burden on developers to demonstrate that contributions would render a scheme unviable, requiring detailed financial appraisals and supporting information. Whilst the need for robust viability assessment is acknowledged, the approach does not adequately recognise the cumulative impact of multiple policy requirements. For large strategic sites, viability must be assessed holistically, taking into account all infrastructure and planning obligations rather than considering each requirement in isolation.
Local Planning Authority Response	A new Planning Obligations SPG is being prepared which aims to provide further guidance and clarity regarding the holistic consideration of multiple policy requirements.
Resultant Action	No action required.
Do you have any comments to make regarding Appendix A, B or C?	
Organisation	Planning consultant acting on behalf of a housebuilder
Representation	It is acknowledged that Appendices A, B and C are intended to provide supporting detail to the operation of the SPG; however, several concerns are raised regarding their clarity, application and potential implications for development viability and deliverability. In relation to Appendix A (Safe Walking Routes to Schools), the guidance provided is broadly consistent with national requirements and is supported in principle. However, it is considered that there is insufficient clarity as to how this will be applied in practice when assessing available school capacity. The SPG indicates that surplus capacity within a two-mile radius may only be considered where safe walking routes are available, yet the process by which such routes are assessed, agreed and evidenced is not clearly defined. There is a risk that capacity which is theoretically available may not be accepted in practice due to subjective or evolving assessments of route safety, thereby increasing the requirement for developer contributions. This introduces a level of uncertainty that is difficult to account for at the planning and viability stage. Greater clarity is therefore required on the

	methodology for assessing safe routes, the evidential requirements, and how any necessary mitigation measures will be scoped and costed. Overall, whilst the appendices provide useful supplementary information, there is a clear need for greater clarity, transparency and proportionality in their application. Without this, there is a risk that additional uncertainty and cost will be introduced into the development process, with potential implications for viability and delivery across BCBC.
Local Planning Authority Response	Comments noted. The local authority will only accept the use of surplus places within a relevant catchment area where the distance from the development to the school(s) is within the national statutory distances of two miles for primary school pupils and three miles for secondary school pupils, and where the journey is served by an 'available' walking route, as defined within the Learner Travel Statutory Provision and Operational Guidance. The purpose of Appendix A is to provide clarity on the criteria that will be applied when determining whether surplus school capacity can reasonably be relied upon to mitigate the impact of development. The requirement for an available walking route reflects existing national guidance rather than introducing a new policy requirement. Where the local authority has not previously assessed the route between a development and the relevant school(s), it will be the responsibility of the developer to provide appropriate evidence demonstrating that the route meets the definition of an available walking route. This evidence may form part of a transport assessment or other supporting information submitted with a planning application and will be considered by the local authority. Further detail will be included within the supporting text to add further clarity and transparency in the assessment of safe walking routes.

Resultant Action	Paragraphs 5.13 and 5.14 have been amended to add further clarity and transparency in the assessment of safe walking routes.
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Proposed SPG Changes as a Result of the Consultation

The paragraphs proposed for amendment following the consultation are detailed below, for the reasons explained in the previous table. Strikethrough text is used to indicate proposed deletions from the SPG, whereas blue text is used to indicate proposed additions to the SPG. Only paragraphs proposed for amendment are included below, there are no proposed changes to the remainder of the draft SPG following consultation. The final draft version of the SPG (Appendix 1) incorporates the proposed amendments below.

5.13 Notwithstanding para. 5.11, any surplus school capacity within the development catchment(s) must also be considered in the context of Safe Walking Routes (A route is considered to be available if it is safe for a learner without a disability or learning difficulty to walk the route alone or with an accompanying adult if the learners age and levels of understanding requires this) before assuming that capacity can offset a development's projected pupil yield. The local authority will only accept the use of surplus places within a relevant catchment area, where the following criteria is met:

- 1) The distance from the development to the school(s) is within the national statutory distances of two miles for primary school pupils and three miles for secondary school pupils; and
- 2) The journey from the development to the school(s) is served with an available walking route, as defined by the local authority (as per the Learner Travel Statutory Provision and Operational Guidance – See Appendix A for further guidance).

5.14 ~~Where school capacity exists within 2 miles of a new development, walking routes must be considered to be available, which must be assessed by the local authority, in line with the Learner Travel Statutory Provision and Operational Guidance. Further guidance is contained within Appendix A.~~ If the local authority has not assessed the route from the development to the relevant schools with surplus places, the onus will be on the developer to demonstrate under the Learner Travel Statutory Provision and Operational Guidance, that the route can be considered 'available'. This could be incorporated within a transport assessment or other supporting information submitted with a planning application.

5.29 The Council will seek contributions for all age groups for all maintained schools where the need arises. Contributions may be used for:

- provision of new schools;
- design of new schools in accordance with the Area Guidelines for Schools in Wales – Building Guidance, which sets out requirements for high-quality, inclusive and sustainable learning environments, including appropriate outdoor learning and play spaces, accessibility, wellbeing and environmental sustainability;

- provision of new classrooms;
- improvements and refurbishment of existing facilities to provide additional capacity;
- provision of additional resources or improvements to existing resources necessitated by the additional demand;
- provision of any necessary interim school measures which, in some circumstances, might be required when it is not possible to ensure that permanent measures will be in place on time.

7.13 In cases where a greater number of dwellings are proposed than originally allocated, additional contributions will be required and secured through subsequent reserved matters applications. Alternatively, a review clause may be incorporated into the wording of a Section 106 agreement to account for any increase or reduction in the number or type of units proposed. The need to include a review clause within a Section 106 agreement will be considered on a case-by-case basis.