

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: $5,974\text{m}^2 \times £3,430\text{m}^2 = £20,490,820$ $£20,490,820 / 600 = £34,151$ per pupil. FFE and IT: £2,167 per pupil. Total cost multiplier = £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.