

BRIDGEND REPLACEMENT LOCAL DEVELOPMENT PLAN (2018-2033)

MATTER 10: GOOD DESIGN AND SUSTAINABLE PLACEMAKING – STRATEGIC ALLOCATION AT LAND WEST OF BRIDGEND (POLICIES PLA3 AND SP2(3))

Prepared on behalf of Llanmoor Development Co. Limited

Rep ID: 223

1. Boyer is instructed by our client, Llanmoor Development Co. Limited ('Llanmoor'), to submit a Matter Statement in respect of Matter 10 – Good Design and Sustainable Placemaking – Strategic Allocation at Land West of Bridgend.
2. This Matter Statement should be read in conjunction with previous responses prepared by Boyer:
 - Regulation 19 Submission (July 2021)

Issue – Is the allocated Strategic Development Site soundly based and capable of delivering new residential and community development over the Plan period?

a) What is the current use of the Strategic Development Site (SDS)?

3. The supply figure of 9,207 is derived from a 20% flexibility allowance with the inclusion of the proposed rollover Allocation COM1(1) Parc Afon Ewenni. However, the current submitted Plan (SD1) proposes the removal of Parc Afon Ewenni and makes provision for 8,335 new dwellings (incorporating a 760 dwelling over allocation / 10% flexibility allowance) to accommodate a housing requirement of 7,575 dwellings during the 15 year LDP period from 2018 to 2033.
4. The majority of the site comprises open farmland pasture with an area of woodland containing enclosed marshland fields to the north east. The open farmland comprises irregular shaped, small to medium fields of improved grassland with vegetated field boundaries. Supporting Evidence for Proposed Allocations: SD134 confirms that in accordance with Welsh Government Predictive Agricultural Land Classification (ALC) the site comprises of land of Subgrade 3b and Grades 4 and 5 with an area of non-agricultural land. This assessment is supported in Background Paper 15: The Best and Most Versatile Agricultural Land.
5. The wooded part of the site to the north east is covered by the Laleston Meadows SINC, a local ecological designation. The site and its internal field boundaries constituting the open farmland include livestock fencing, maintained hedgerows and hedge banks, a tree belt and a stone wall.

b) What is the proposed use of the SDS?

6. The submitted Drawing Booklet (SD139(a)) illustrates a detailed masterplan which clearly outlines the proposed mix of complementary land uses and areas on site. Of the 36.86ha site it is proposed to provide the following:
 - a) Residential: 22.46ha providing a high quality, mixed tenure residential community of 850 open market & affordable homes (20%), with distinct character areas responding to the site context and creating a sense of place.

- b) Education: 1.5 form entry Primary School and 45 nursery places, set within 1.6ha, incorporating playing fields and associated infrastructure and landscaping. The space provision is discussed further in relation to Question (f).
- c) Woodland Area / SINC: The retention of 7.82ha of natural / semi natural areas in the north eastern section of the site for nature conservation / new wetland habitat / SUDS / informal green space.
- d) Formal Public Recreation & Open Space: The provision of 2.1ha children's play space / Informal amenity space provided over a combination of Local Equipped Areas of Play (LEAP), Local Areas of Play (LAP), Local Landscape Area of Play (Softer landscape forms and features) and Trim Trail Adventure Play Zone. The proposal includes a number of distinct areas of public open space, including natural parks such as the Southern Park, Eastern Park and Corner Park, as well as more formal parks at the Community Green and Grow Garden, and natural edges such as Western Linear Park.
- e) Green Infrastructure: A network of 2.87ha of attractively landscaped Green Streets and Spaces provided across the development which will accommodate and link the essential green infrastructure for the site. Moreover, landscaped SUDS features will be integrated to manage surface water and create other 'green elements' including generous gardens, hedges, trees, street trees and will provide further amenity space and help increase habitat and biodiversity.
- f) Vehicular Access: A new vehicular access is proposed at the southern boundary with the A473. In terms of the internal vehicular access the Drawings Booklet (SD139(a)) provides a street hierarchy. The masterplan also provides for an indicative bus stop location opposite the school as well as potential emergency access at the north eastern and south western boundaries.
- g) Pedestrian Access: The existing pedestrian access is retained. The masterplan includes provision for the Laleston Trail Link through the site which forms part of the wider Bridgend Circular Walk Public Right of Way. Furthermore, the enclosed byway with the existing hedgerow corridor will be retained as the Y Berth cross link. In terms of active travel the masterplan retains the existing access points along the boundaries, includes provision for shared foot/cycle routes, an indicative informal path/nature trail to the north as well as a trim/play trail to the west

7. The above has been subject to detailed discussions with Bridgend County Borough Council and the principles of which are reflected within Policy PLA3.

8. However, it is noted that further discussion is required concerning the size of area provided for education. This matter is addressed in response to Question (f).

c) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?

9. The strategic site has been subject to extensive technical assessments (Supporting Evidence for Proposed Allocations SD134 – SD157) which provide a clear evidence base for the deliverability of the site within the Plan period. Furthermore, a robust assessment of the site is provided by Bridgend County Borough Council in relation to consultation responses from members of the public (SD17) and developers and landowners (SD20). In each case the responses provided confirm a significantly high degree of confidence that the site is realistically deliverable and that any constraints can reasonably be mitigated.

10. Given the detailed assessment of the site as available in the evidence base identified above, and to save repetition on the assessment, a brief summary is provided:

11. *Green Wedge* – The southern section of the site is currently located within Green Wedge ENV2(4) Bridgend and Laleston within the Adopted LDP. However, a Green Wedge Review

(SD73) has been prepared to consider the need for such designations in the Deposit LDP, and concluded that whilst LDP Policy ENV2: Development in Green Wedges has been successfully used for its primary objective of preventing coalescence, other policies contained within the extant LDP, particularly ENV1: Development in the Countryside, have also been successful in preventing coalescence.

12. The Review recommends that as there are policy mechanisms included within the proposed Plan which define settlement boundaries and policies strictly controlling development in the countryside, open space, biodiversity, landscape and the environment whilst also allocating sufficient land for housing. Consequently, it is not necessary to take forward the Green Wedge policy into the Replacement LDP and therefore the Green Wedge is not a constraint.
13. *Landscape* – The detailed Landscape and Visual Appraisal (SD149) concludes that the masterplan framework proposed for the site (SD139(a)) has been sensitively designed through a landscape and ecology-led approach, with appropriate incorporation of mitigation measures in order to address any concerns in relation to landscape and visual matters. As such, the development of this site for residential development would not cause significant or wide-ranging adverse effects upon its surrounding landscape context.
14. *Ecology* –An ecological desk study and Extended Phase 1 survey (SD143) and Laleston Meadows SINC: Habitat Assessment Summary Note (SD147) have been undertaken, all of which have influenced the masterplan which has sought to locate development across those habitats of predominantly limited ecological value whilst retaining boundary habitats as far as possible. Where retained, such features have been accommodated within proposed informal open green space and sustainable transport links, which ultimately enhances connectivity throughout the Site and contributes to the wider green infrastructure resource.
15. *Archaeology & Heritage* – An Archaeological and Heritage Assessment (SD138) confirms that the site does not contain any World Heritage Sites, scheduled monuments, listed buildings, registered historic parks and gardens or historic landscapes.
16. In terms of archaeological remains, the site is identified as having a moderate to high potential to contain remains from the medieval period, particularly in its northern extremity, which is adjacent to the site of the former Llangewydd Church. However, the land is a SINC and will not be developed.
17. While there is a small amount of evidence for late prehistoric and Roman activity in the surrounding 1km study area, the potential for archaeology of these periods within the site is deemed to be low and in respect of the Laleston Conservation Area, there will also not be any significant changes to its visual setting.
18. *Arboriculture* - A full BS 5837:2012 Trees in Relation to Design, Demolition and Construction compliant survey of trees and hedgerows on site has been undertaken (SD136), which confirms that overall the trees identified throughout the site are a mix of values.
19. The Tree Survey identifies the presence of Ancient Semi-Natural Woodland, Restored Ancient Woodland, and Plantations on an Ancient Woodland within the northern SINC area of the site (which whilst within the site boundary is excluded from any development), as well as identifying that at there are Tree Preservation Orders (TPO) along the north and north eastern boundaries. However, the arboricultural constraints information provided illustrates that there are no

overarching constraints to the development of the site, with certain trees which must be prioritised for retention. The baseline provided has influenced the master planning and layout works to provide a suitable development, including the retention of the SINC with no development within that area.

20. *Transport* – The Transport Statement (SD155) and the Interim Residential Travel Plan (SD146) confirm the acceptability of the proposed new signalised junction with the A473, as well as the sites ability to integrate with the existing active travel infrastructure to provide real alternatives for travel for all trip purposes.
21. *Air Quality* - An Air Quality Assessment (SD135) has been provided to assess the impact of the proposed development and subsequent increased traffic emissions arising from the additional traffic on the AQMA of Park Street. The overall operational air quality effects of the development are judged to be non-significant and have been shown to be acceptable, with concentrations being well below the air quality objectives.

d) In light of the constraints, and having regard to the need to provide affordable housing, is SDS economically viable?

22. Llanmoor has been actively engaged regarding viability and evidence has been provided to the Council, including a detailed viability statement as prepared by Crompton Land & Development Ltd, which has been subject to rigorous examination via an independent party (Burrows Hutchinson) with agreement that the site is deliverable and viable.
23. Furthermore, in terms of deliverability Llanmoor have been in negotiations with the various landowners and their respective agents since October 2018 and can confirm that a Formal Joint - Landowner Agreement was legally exchanged and completed in October 2020.
24. As such, Llanmoor now has complete control over the whole of the land within the Allocation through individual landowner Option Agreements which allows the delivery of the whole site in a comprehensive manner.
25. Moreover, Llanmoor are a long-established and reputable regional housebuilder that has delivered a significant number of homes in Bridgend, and throughout South Wales. With this significant experience, combined with planning /technical information assessments (Supporting Evidence for Proposed Allocations SD134 – SD157) there is confirmation that there are no known constraints which cannot be mitigated. Moreover, there is agreement that the submitted viability information is accepted, all of which confirms that the delivery of 850 residential dwellings, including 20% affordable dwellings is economically viable.

e) Are the number of residential units proposed realistic and deliverable over the plan period?

26. The strategic site has been subject to extensive technical assessments (Supporting Evidence for Proposed Allocations SD134 – SD157) which provide a clear evidence base for the deliverability of the majority of the 850 dwellings within the Plan period. In particular Drawing Booklet (SD139(a)) illustrates a detailed masterplan which clearly outlines the proposed mix of complementary land uses and areas on site and provides a detailed justification for a realistic amount of development.
27. Also, as confirmed in the Statement of Common Ground, Strategic Sites (SD241), there is no dispute with the Authority regarding the housing trajectory for this site which confirms that 830 will be provided by 2032/33, with only 20 dwellings beyond the plan period.

28. As noted, the site is promoted by Llanmoor and is the only developer led strategic site. Llanmoor are a well respected house builder and are clearly committed to the development of the site as evidenced by the significant investment both to secure control of the site and to provide the required information throughout the multiple stages of the RLDP.
29. This approach is maintained, with detailed ongoing discussions with the Authority regarding the next stages. Llanmoor are in the process of arranging formal Pre Application Meetings and are actively working towards preparing a Planning Application for 2023.

f) How and when will the proposed new educational facilities be delivered?

30. In terms of delivery of new education facilities Llanmoor considers the primary school and nursery are important facilities that will help community building and the sustainability of the development. The school building could be delivered directly by Llanmoor using a specialist school designer and specialist construction team, or the land and contributions could be provided to Bridgend County Borough Council. The latter is the more usual approach, although direct provision has advantages especially in the context of a live construction site. Other advantages usually include cash flow, from the developers point of view, and reduced risk and resource demand on the Council. Either way, the school will be built to the relevant standards, and made available to the Council who will undertake the necessary processes to set up the operation of the school.
31. Discussions with the Council, at planning application stage, will inform the procurement and the timing for delivery of the school. The indicative location of the school supports early delivery, if that is agreed. However, Llanmoor recognises that if a school is opened too early there can be negative impacts on other nearby schools. If parents from nearby catchments choose the new school over their local school this affects the viability of existing schools. It also results in children from the wider area gaining places at the new school - that are then not available to development resident children. There is therefore a balance to be found, which will be informed by a number of factors, including the availability of places in existing schools to accommodate children resident in the first new homes that are occupied.
32. With regard to the school size and provision of an onsite, Llanmoor have appointed Education Facilities Management Partnership Limited (EFM) to review and advise on the primary education requirements stated in Draft Policy PLA3: Land West of Bridgend. EFM have provided their report as attached at *Appendix 1*.
33. Draft Policy PLA3 proposes allocation of Land West of Bridgend for a Strategic Mixed-use Sustainable Urban Extension, including 850 residential dwellings, 20% affordable housing, a 2.3ha 1.5 Form Entry Primary School, outdoor facilities and active travel routes.
34. Llanmoor do not object to education on the site, and agreed that the provision of a new primary school as part of the development will enable primary education needs to be met locally and assist sustainability. However, EFM consider that the provision and size has to be justified and that the wording of the Policy should be less prescriptive, and should take account of all the relevant factors at the time that application and development comes forward.
35. Full details are provided in *Appendix 1*.

g) What are the mechanisms and timescales for delivering the site?

36. As confirmed in the Statement of Common Ground, Strategic Sites (SD241), there is no dispute with the Authority regarding the housing trajectory for this site, which confirms that 830 will be provided by 2032/33, with only 20 dwellings beyond the plan period.
37. As noted, the site is the only strategic site which is developer led, and Llanmoor has complete control over the whole of the land within the Allocation through individual landowner Option Agreements, all of which provides an enhanced level of certainty over the deliverability and the timescales proposed.
38. Given the above position, as well as the existing significant evidence base, there are no constraints in terms of progressing towards a suitable planning application. In this regard pre application discussions with Authority are now ongoing in relation to refining the preparation of a planning application for submission following adoption and to allow the first phase of development to commence and as set out in the Trajectory, 30 dwellings to be delivered within 2024/25. Llanmoor are wholly committed to progressing the site to deliver the agreed Land West of Bridgend (PLA3) housing trajectory timeframe as identified in Appendix 1 of the Replacement Local Development Plan – Written Statement (SD1).

h) Is the allocation of the SDS essential to ensure the soundness of the Plan?

39. Strategic Site – Land West of Bridgend (PLA3) is essential to ensure the soundness of the Plan in terms of delivery (Test of Soundness 3) of the Regeneration and Sustainable Growth Strategy between 2018- 2033. The site is supported by robust technical and viability evidence to confirm the delivery of 850 residential dwellings which will include 20% affordable dwellings.

APPENDIX 1 – EFM Primary Education Report



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Bridgend Replacement Local Development Plan 2018-2033
Draft Policy PLA3: Land West of Bridgend, Bridgend
Sustainable Growth Area
Primary Education Requirements

Jan Kinsman
February 2023

Bridgend Replacement Local Development Plan 2018-2033
Draft Policy PLA3: Land West of Bridgend, Bridgend Sustainable Growth Area
Primary Education Requirements
February 2023

1 Background and Summary

- 1.1 EFM has been appointed by Llanmoor Development Company Limited (Llanmoor) to review and advise on the primary education requirements stated in Draft Policy PLA3: Land West of Bridgend, Bridgend Sustainable Growth Area of the Bridgend County Borough Local Development Plan 2018-2033 (Replacement Local Development Plan).
- 1.2 Draft Policy PLA3 proposes allocation of Land West of Bridgend for a Strategic Mixed-use Sustainable Urban Extension, including 850 residential dwellings, 20% affordable housing, a 2.3ha 1.5 Form Entry Primary School, outdoor facilities and active travel routes.
- 1.3 No objection in principle to the provision of education on the site is raised by Llanmoor, and it is agreed that the provision of a new primary school as part of the development will enable primary education needs to be met locally and assist sustainability.
- 1.4 However, EFM considers that the wording of the Policy should be less prescriptive, and the provision has to be justified and take account of all the relevant factors at the time that the application and development comes forward.
- 1.5 Under Development Requirements 2), draft policy PLA3 specifies,

“2.3 hectares of land to accommodate a 1.5 form entry primary school with co-located nursery facility and a financial contribution to nursery, primary, secondary and post-16 education provision as required by the Local Education Authority. The financial contribution (including timing and phasing thereof) must be secured through Section 106 Planning Obligations in accordance with the Education Facilities and Residential Development SPG. The school must be accessible to new and existing residents by all travel modes, enabled by the development;”

The supporting text at paragraph 5.2.21 includes the following further information,

“There are multiple schools in the immediate area in addition to various local services and community facilities, although existing capacities are limited and the site must provide a 1.5 form entry primary school on-site together with a contribution towards secondary school provision in the area. The former contribution will necessitate 2.3ha of land being set aside for construction of the new school, inclusive of a land buffer to enable future expansion.”

- 1.6 The requirement for a 2.3ha primary school site appears excessive. No detailed assessment of the need for a 1.5 form entry school or a 2.3ha site appears to be available as part of the evidence base for the Replacement Local Development Plan.

Engagement with the Council has been sought, to better understand the Council's approach (Appendix 1).

1.7 The Council's responses are awaited, and this report is based on EFM's assessment in advance of detailed information from the Council. It may therefore be appropriate to update to this report in due course.

1.8 The provision of a primary school on site is not disputed. However, EFM concludes that, in stating school size and site area requirements, the draft policy is unduly prescriptive and not justified by evidence. It risks imposing an unreasonable burden on the proposed development, and undermining sustainability. It must be amended to provide more flexibility.

1.9 It is suggested that the draft policy should be amended to read:

~~"2.3 hectares of land to accommodate a 1.5 form entry primary school with co-located nursery facility and a financial contributions to nursery, primary, secondary and post-16 education provision or direct provision of facilities to appropriate standards as required by the Local Education Authority..."~~

The supporting text should be amended to read:

*"There are multiple schools in the immediate area in addition to various local services and community facilities, although existing capacities are limited and the site must provide a 1.5 form entry primary school on-site together with a contribution towards secondary school provision in the area. The **primary school must have capacity to meet the likely long term demand from the proposed development (as a minimum) and provision must be available on site or off site to meet higher demand in the short term – indicatively 280 places, based on the Council's pupil yield of 0.33 pupils per house. former contribution will necessitate 2.3ha of land being set aside for construction of the new school, inclusive of a land buffer to enable future expansion. Land must be made available for the construction of the primary school and nursery, and consideration is to be given to the reservation of additional land to enable future expansion of the school and the terms of any such reservation.**"*

1.10 The wording of Appendix 5 under SP2(3) / PLA3 subheading "Education", on page 286 of 376 (pdf version), should also be similarly amended by the deletion of the first sentence of the second paragraph (which starts, "The masterplan makes provision ...").

1.11 The following sections of this report consider pupil yield, the impact of the proposed development, potential education solutions and need for a 2.3ha school site. The assessment supports the above suggested amendments to the draft policy.

2 Pupil Yield

2.1 It appears that BCBC has used the pupil yield figures stated in its SPG16, Educational Facilities and Residential Developments, to determine the policy requirements. The

primary pupil yields stated in Table 1 of SPG16 are 0.33 children (or pupils) per house and 0.1 per apartment. Exemptions are made for certain types of dwellings. Multiplying 850 dwellings by the pupil yield factor of 0.33 produces a maximum expectation of 280.5 pupils. It is assumed this calculation is the justification for requiring a 1.5 form entry school – which would provide capacity for 315 primary pupils.

- 2.2 BCBC adopted its SPG16 in March 2021, following consultation. In response to the consultation, Llanmoor noted the increases in pupil yield proposed including the 50% uplift in the primary pupil yield. BCBC’s justification for the SPG pupil yields is that they are calculated from actual pupil figures, taken from one particular development (Broadlands in Bridgend). Further information about the development and the analysis undertaken has been requested from BCBC, and is awaited.
- 2.3 Leaving aside that BCBC’s calculations are based on only one development at a particular period of time, EFM’s view is that BCBC’s figures are likely mathematically correct but represent a calculation of pupils resident rather than additional demand. This is because (so far as is evident) BCBC has taken no account of families moving locally or of wider demographic changes.
- 2.4 In order to provide a more robust assessment of pupil yield, primary pupil numbers and housing numbers have been considered at an authority-wide level. An estimate of pupil yield from existing dwellings can be calculated from the demand for school places and number of dwellings in the authority area. The latter can be found on the StatsWales website¹.
- 2.5 Table 1 below shows the change in the number of primary pupils in Bridgend schools, alongside the change in the number of dwellings in the BCBC area. Pupil yields are calculated for each year by dividing the number of pupils by the number of dwellings. StatsWales does not have a dwellings figure for 2021, so it has been assumed that completions were the average of the previous three years (342 dwellings). It should be noted that the dwellings figure includes all dwellings, whilst BCBC’s pupil yields exclude certain dwellings - notably those with one bedroom. 2011 Census dataset QS411EW (Number of Dwellings) indicates the number of households in Bridgend with no bedroom or only one bedroom is 5.7%.

Year	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Pupils	11485	11295	11255	11120	11045	10755	10660	10570	10695	10745	10920	11145	11485	11630	11780	11770	11725	11740	11575
Dwellings	56541	57169	57883	58490	59258	59853	60409	60960	61445	61773	62011	62462	62924	63437	63762	64111	64519	64789	65131
Pupil Yield	0.203	0.198	0.194	0.190	0.186	0.180	0.176	0.173	0.174	0.174	0.176	0.178	0.183	0.183	0.185	0.184	0.182	0.181	0.178

Table 1 Calculation of Primary Pupil Yields From Existing Dwellings

Notes – primary pupils are counted in January of each school year (later in 2021 and 2022 due to coronavirus) so the figure for 2003 is a count in 2004, whilst the dwelling estimates are as of 31 March of the stated year

¹ <https://statswales.gov.wales/Catalogue/Housing/Dwelling-Stock-Estimates/dwellingstockestimates-by-localauthority-tenure>

2.6 Examination of the figures in Table 1 shows the number of pupils has varied over the period considered but is now (in January 2022) only slightly higher (less than 1%, in fact) than it was in January 2004. Housing growth has been fairly steady, and increased by over 15% in the same time period. It follows that pupil yields have generally fallen over the same period. The changes described here are graphically illustrated in Figure 1 below, which shows percentage change from 2003/04. The average pupil yield over the last ten years is 0.18 primary pupils per dwelling. Assuming that 6% of dwellings are excluded from pupil yield calculations this figure should be adjusted 0.192 primary pupils per dwelling (0.18/0.94).

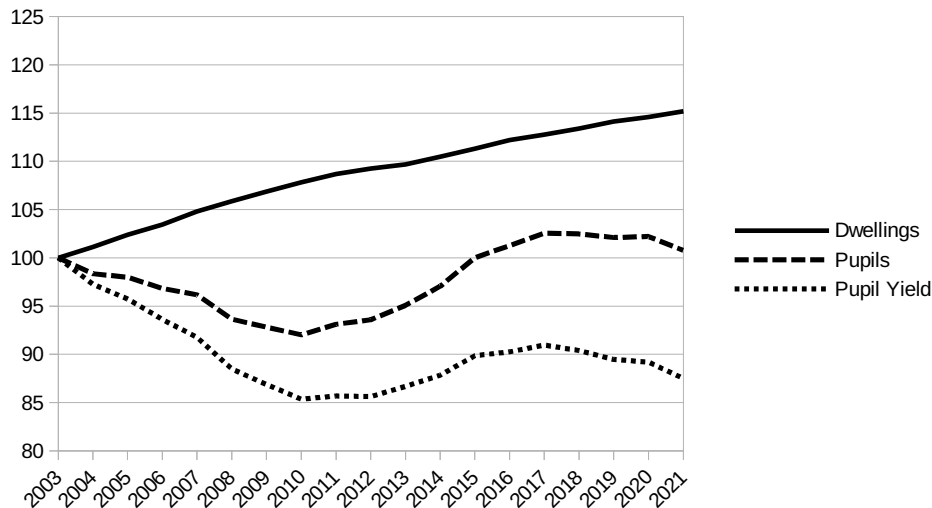


Figure 1 Percentage Change in Pupils, Dwellings and Pupil Yield

2.7 What Figure 1 does not indicate is a steady increase in demand for primary places that is commensurate with the increase in dwellings over the period. What is evident is a general downward trend in pupil yield, explained largely by people living longer and doing so in their own homes, together with variation in pupil numbers explained by variations in births.

2.8 The increase in dwellings between 2003 and 2021 is 8,590 (65131 – 56541). Were BCBC’s primary pupil yield of 0.33 correct, there would have been a very substantial increase in the number of primary pupils. Discounting 6% of additional dwellings as not contributing to pupil yield, the expected number of additional pupils would have been 2,665 (calculated as 94% x 8,590 x 0.33). Were EFM’s calculated pupil yield of 0.192 correct, there would have been an increase of 1,550 pupils. The maximum increase was in 2017, when the number of pupils peaked at 11,780 - an increase of 295 pupils.

2.9 Figure 2, overleaf, compares the theoretical percentage change in the number of primary pupils based on the alternative pupil yields of BCBC and EFM, the actual change and the change in dwellings.

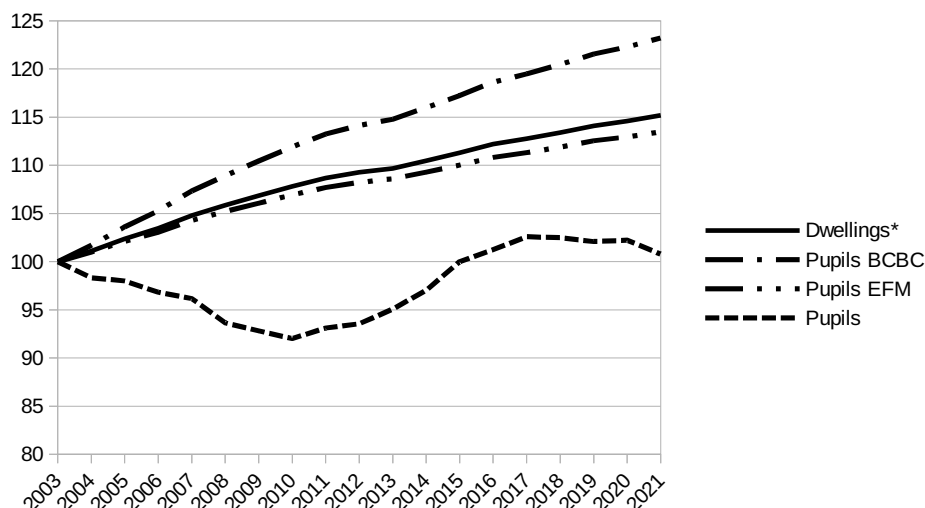


Figure 2 Comparison of Percentage Change in Pupils and Dwellings

3 Assessment of Demand

- 3.1 The above analysis is based on the whole county borough, and it is not being suggested that the primary education demand arising from the proposed allocation should be ignored. It is, of course, the case that new housing gives families the opportunity to live in different places. It is agreed that the provision of a new primary school as part of the development will enable primary education needs to be met locally and assist sustainability.
- 3.2 As stated at paragraph 2.3 above, it is believed that BCBC’s pupil yields provide a calculation of pupils resident rather than additional demand. As such, they take no account of families moving locally or of wider demographic changes. The allocation is not an isolated location, but on the edge of the largest town in the county borough containing about a third of the population². The effects of local moves and demographic changes will likely be substantial.
- 3.3 While it is accepted that new housing is likely to attract above average numbers of children/school pupils as it is built, it is also expected that child/pupil numbers will gradually decline as the development matures. As such, BCBC’s pupil yields are substantially above the average for the county borough – as demonstrated above – and will decline over time. These points have been put to BCBC for comment (Appendix 1).
- 3.4 When considering the education provision needed for the allocation, a reasonable starting point is the long term demand. Applying the pupil yield of 0.192 per dwelling, established above, to 850 dwellings (assuming none are discounted) produces a figure of 163 pupils. This is comfortably within the 210 place capacity of a 1 form entry primary school.

² <https://www.bridgend.gov.uk/media/6227/bridgend-county-borough-profile-2018.pdf>

- 3.5 As an indication of the potential demand from development residents that might be experienced in the short term, before the development starts to mature, BCBC's calculation might be reasonable - so it is considered further in this context.
- 3.6 BCBC's figure is 281 primary pupils – some 71 more pupils than could be accommodated in a one form entry school. Leaving aside factors such as local moves, and the potential for some children to stay on at their existing schools, it is reasonable to consider how 71 additional pupils could be accommodated for a number of years.
- 3.7 A number of parents may wish their children to have a Welsh Medium primary education. There are four Welsh Medium primary schools with about 900 primary pupils on roll, out of a total of about 11,500 primary pupils. On this basis, about 8% of pupils or 22 out of BCBC's figure of 281 pupil might seek Welsh Medium primary education – and reduce the demand for English Medium places accordingly.
- 3.8 Starting with BCBC's figure of 281 pupils, 210 could be accommodated in a 1 form entry school and 22 might seek Welsh Medium places. This leaves 49 pupils to be provided for.

4 Potential Education Solutions

- 4.1 BCBC's approach is to provide a 1.5 form entry school on site, and this is allowed for in Llanmoor's planning for the development to date – which includes provision for a 1.6ha primary school site (which is ample for a 1.5 form entry school). This could be the most appropriate provision to support the development, but it involves providing 105 additional places to cater for 49 pupils – or thereabouts.
- 4.2 Moreover, BCBC has not yet provided clear evidence to support this approach and there may well be another, more sustainable, solution. The most obvious alternative would be to make use of available capacity in existing schools; and a further option would be to provide temporary expansion on site, or off site. There is currently no evidence that these alternatives have been fully explored.
- 4.3 BCBC has been asked to provide information about school capacities and pupil forecasts, which are awaited (Appendix 1).
- 4.4 There are a number of schools within easy reach of the proposed development, and the schools included in Table 2 overleaf are all within about one mile.

School	PAN	Capacity	NOR Jan 22	Spare places
Bryntirion Infants *	40	113	115	3
Trelales Primary School	30	199	193	6
Llangewydd Junior School *	90	382	342	45
Cefn Glas Infants	66	180	152	28
Maes Yr Haul Broadlands	75	508	441	67
St Mary's R C Primary School *	30	220	233	7
Totals	331	1602	1476	156

Table 2 Local Primary Schools – Published Admission Numbers, Capacities, Numbers on Roll and Spare Places

*Note: * denotes schools that have admitted pupils in excess of their PAN, and the additional pupils so admitted are not counted in the spare places calculation*

- 4.5 Table 2 shows there a substantial number of places available in existing local primary schools as of January 2022. There are more than enough places to meet the additional demand expected by BCBC's assumed calculation.
- 4.6 Additional demand for available places in existing schools would have beneficial impacts on the viability of those schools, and would avoid unnecessary construction and the creation of surplus places in the new primary school – which would likely have adverse impacts on existing schools. In terms of sustainability, utilising available capacity looks likely to be a much better solution.
- 4.7 Therefore, whilst the local plan examination may not be the appropriate place to make final decisions about what education provision should be made, it is clearly undesirable that the draft policy wording specifies a 1.5 form entry school. Llanmoor do not dispute that an appropriate education provision can, and should be, provided on site. However, the draft policy is unduly prescriptive, and must be amended to provide more flexibility.

5 The Need for a 2.3ha School Site

- 5.1 BCBC has not explained why it considers a 2.3has school site is necessary, other than stating that land would be needed to enable expansion of the school. It does not appear that any such expansion could be related to the proposed development, and it would not be reasonable to impose an unrelated demand on the development. In addition, sterilising land that could be used for housing would from detract from the main objective of allocating the site.
- 5.2 It is understood that BCBC relies on DfES Building Bulletin 99: Briefing Framework for Primary School Projects (BB99) for calculating school site areas, and details of its calculation have been requested.

5.3 BB99 provides non-statutory guidance on total site area guidance, expressed as “Likely site area” with a range, calculated as a base area allowance plus a multiplier per pupil. Table 3, below, provides a summary for various sizes of primary schools.

	Formula	1 form entry	1.5 form entry	2 form entry	2.5 form entry	3 form entry
Places (N)		210	315	420	525	630
Likely site area: from	2200 + 36N	9760	13540	17320	21100	24880
to	2500 + 40N	11000	15200	19400	23600	27800
Mid point		10380	14370	18360	22350	26340

Table 3 BB99 Site Area Calculations for Various Sizes of Primary Schools, sqm

5.4 The above figures are guidance. The school designer will work with the area available to make best use of the site, whilst ensuring the various required areas are achieved. Awkwardly shaped or contoured sites will be challenging, as formal play pitches are large rectangular areas that require gentle gradients. Likewise, it is usually desirable to minimise level changes in the school building itself. The school site indicated on the concept plan for this site is a ‘sensible’ shape and understood to be reasonably level.

5.5 Table 3 is stated in sqm, with 10,000 sqm being 1.0ha. The currently proposed school site area is 1.6ha, or 16,000 sqm. This is a very generous provision for a 1.5 form entry school, as it is in excess of the maximum likely site area for a 1.5 form entry primary school - and almost within the range for a 2 form entry school (1.73ha to 1.94ha).

5.6 BCBC is seeking 2.3ha which is almost the top of the range for a 2.5 form entry school. This has not been justified and the draft policy should be amended accordingly.

5.7 The areas in Table 3 do not specifically allow for nursery provision, which might require a small amount of additional space - depending on what is proposed.

6 Conclusions

6.1 Llanmoor has no objection in principle to provision of education on the allocation site, and it is agreed that the provision of a new primary school as part of the development will enable primary education needs to be met locally and assist sustainability.

6.2 However, BCBC’s draft policy wording is based on a primary pupil yield that provides an unrealistic estimate of the long term demand for primary school places.

6.3 Therefore, whilst the principle of a new primary school on site is accepted, this report finds that the draft policy wording has not been adequately explained or justified and is unduly prescriptive. It risks imposing an unreasonable burden on the proposed development, and undermining sustainability. It must be amended to provide more flexibility.

6.4 Engagement with the Council has been sought, and the Council's responses are awaited. It is hoped that amended policy wording can be agreed.

Subject: Proposed Development - Land West of Bridgend - PLA3 - Education Implications
Date: Fri, 3 Feb 2023 13:09:26 +0000
From: Jan Kinsman <jan@efm-ltd.co.uk>
To: garth.denning@bridgend.gov.uk

Dear Gareth

I trust you are keeping well - it has been a quite few years since I was last in touch with you!

I left a telephone message yesterday, asking you to please call me as I wanted to introduce my involvement with this project. It would be helpful to speak when you have time to call.

I confirm I have been appointed by Llanmoor Homes to review the education implications of the proposed development and the education requirements being specified in the emerging Replacement Local Development Plan (2018-2031) (RLDP).

I am preparing a report for submission to the RLDP Examination, and would really appreciate your assistance and that of your education colleagues in ensuring my report is as accurate and up to date as possible.

I would be very grateful if you could respond to the points set out below. Time is of the essence, so I am very happy to have responses to the individual points as they are available if there is likely to be a delay in providing some of the information I have asked for.

1. I have a copy of SPG 16, which includes pupil yield figures. I understand these pupil yields have been based on just one development (Broadlands in Bridgend). Please provide further details of the Broadlands development, the pupil data and the calculations undertaken. Please confirm whether any evidence was collected about, or account taken of, households moving locally as part of the analysis?
2. Does the Council accept that the pupil yields produce pupil numbers for new housing that are substantially above the long term average for the Bridgend CBC area?
3. Evidence from the 2011 Census shows that the demographic characteristics of households that move are different to average households - generally biased to younger age groups. This appears to be true for new housing as well as established housing. Does the Council agree that pupil numbers, as calculated with its current pupil yields will decline to the long term average as 'new' housing becomes 'established' housing?
4. Please provide full information on primary school capacities, recent and proposed capacity changes, numbers on roll and the most up to date pupil forecasts - for all primary schools in Bridgend and nearby schools to the west. Please provide details of the pupil forecasting process, and any primary planning areas that are used if forecasting is based on planning areas. I have looked, but not found, this information on line. If it is already

published, then please provide links.

5. To assist me with understanding the specific policy requirements set out in draft Policy PLA3, please provide details of the site area calculation that supports the 2.3ha proposed school site area requirement. Please also provide details of the pupil place calculation.

Many thanks, and please do not hesitate to contact me if any of the above is unclear. My mobile number is usually the best point of contact.

Best wishes, Jan

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Jan Kinsman

EFM (Educational Facilities Management Partnership Limited) Mobile: 07841 583256 Landline: 01920 877188



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