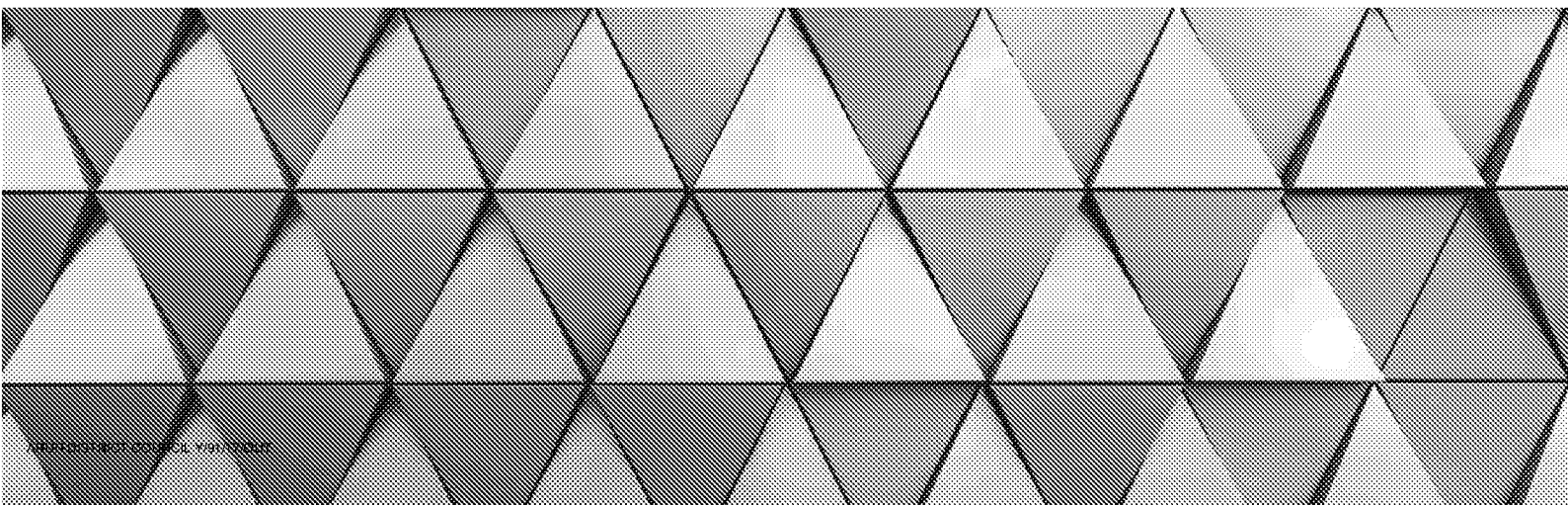


Land to south west of Yapton

Education Requirement Analysis

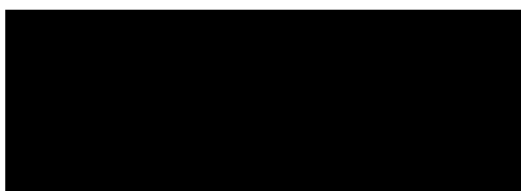
on behalf of Gleeson Strategic Land and Landlink Estates Ltd

December 2017



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1.0 Introduction

- 1.1 This Education Requirement Analysis report has been prepared on behalf of Gleeson Strategic Land and Landlink Estates Ltd ("the Applicants") in support of their respective combined development proposals for up to 550 dwellings ("the Proposed Development") on the emerging Arun Local Plan ("LP") Policy H SP2c: Yapton (SD7) strategic allocation ("the Application Site").
- 1.2 For the purposes of this report, Arun District Council ("ADC") is the local planning authority ("LPA") and West Sussex County Council ("WSCC") is the Local Education Authority ("LEA") for West Sussex.
- 1.3 This Education Requirement Analysis report follows the following broad structure:

Section 2: Overview of the relevant planning policy context;

Section 3: Overview of the relevant West Sussex education planning guidance;

Section 4: Review of the existing education facility provision context;

Section 5: Analysis of the education provision implications of the Proposed Development;

Section 6: Analysis of the Ford (SD8) Site

Section 7: Education analysis conclusions.

2.0 Planning Policy Context

- 2.1 The emerging Arun Local Plan ("LP") covering the period 2011 to 2031 is currently being scrutinised at an Examination in Public ("EiP"). The LP matters considered of relevance to this Education Requirement Analysis report are set out below:

The Application Site

- 2.2 Under Policy H SP2c: Yapton (SD7), the Application Site is allocated as a strategic site to provide at least 400 dwellings over the LP period. Amongst other things, the policy seeks the provision of a 1-Form Entry ("FE") primary school and nursery places.
- 2.3 However, the Applicants submitted representations to the Regulation 19 LP consultation and more recently to the EiP objecting to the justification to provide on-site primary school and nursey places.
- 2.4 As part of the EiP, WSCC submitted a 'School Provision in Arun District: Update' dated September 2017 (**Appendix 1**) ("WSCC School Provision Update, September 2017"). This update reconfirmed the WSCC position that the Application Site should make on-site provision for a 1FE primary school.
- 2.5 However, in respect of the strong objection from the Parish Council during the EiP that Yapton would wish to extend the existing primary school rather than have an additional primary school within the village, the Inspector's Interim Findings Following Hearing Sessions, dated 11 October 2017 (**Appendix 2** – relevant extracts) ("the Inspector's Interim Findings") seeks further clarity from WSCC (paragraph 25) amongst other things, , the scope to extend existing primary schools (to sustain them and reach an optimum size) the scope to extend existing primary schools and community preferences.
- 2.6 In response to the Inspector's Interim Findings (**Appendix 3** – relevant extracts) the Council asserts that WSCC have justified their requirement [for on-site provision on the Application Site]. Despite this, the Council then proposes Main Modification wording, endorsed by the LP subgroup committee on 20 November 2017, to 'provide adequate flexibility' to allow appropriate consideration of education facility need at the planning application stage. Specifically regarding the Application Site, the following Main Modification wording (MM 75) has been proposed:

"provide a one-form entry primary school and nursery places if the need is generated for such facilities either on-site, or by making a contribution towards new facilities or the improvement or expansion of the relevant existing facilities."

- 2.7 The fact the Council has proposed Main Modification wording to enable off-site primary school provision, the introduction of flexibility in the policy could reasonably be inferred to indicate that the Council accepts that WSCC have not provided any evidence to justify on-site primary school and nursery place provision.
- 2.8 Indeed, in response to a direct request from the Inspector, WSCC have failed to provide any information on: (a) Optimum school size; (b) The scope to extend Yapton Primary School; and (c) The community at Yapton's preference to maintain a single primary school. The only additional information provided is an updated schedule of WSCC's purported primary education requirements for each strategic allocation (Examination Document SEDP7) (**Appendix 4**).
- 2.9 The Applicants will be submitting representations to the Main Modifications consultation, amongst other things, on WSCC's failure to provide any evidence to justify on-site provision of a primary school and nursery places on the Application Site.

Other Strategic Sites of Relevance

Policy H SP2c: Barnham / Eastergate / Westergate (SD5)

- 2.10 The Barnham / Eastergate / Westergate (SD5) site ("the SD5 Site") is allocated for 2,300 dwellings within the LP period with a further 700 dwellings in the period up to 2031. Overall, the SD5 Site is allocated for 3,000 dwellings. As part of the development, the policy requires the on-site provision of a new 2FE primary school and a 1FE (expandable to 2FE) primary school and nursery places.
- 2.11 Unlike the Application Site, no representations were submitted to the Local Plan examination objecting to the need to provide a 2FE primary school and a 1FE (expandable to 2FE) primary school and nursery places.
- 2.12 The Council's 'Status of Strategic Allocation Sites as at 25th September [2017]' evidence to the LP examination shows the first housing completions on the SD5 Site in the monitoring year 2018/19.

Policy H SP2c: Ford (SD8)

- 2.13 The Ford (SD8) site is allocated to deliver at least 1,500 dwellings over the LP period. Amongst other things, the policy requires the on-site provision of a new 2FE primary school and nursery places.
- 2.14 Unlike the Application Site, no representations were submitted to the Local Plan examination objecting to the need to provide a 2FE primary school and nursery places. Indeed a signed Statement of Common Ground was submitted between the landowners / developers confirming the provision of a 2FE primary school and nursery places.
- 2.15 With regard to secondary school provision, the WSCC School Provision Update, September 2017 outlines (paragraph 17) that the existing schools have limited capacity for expansion to meet future need. For this reason, an area of search for a site for new secondary school has been proposed based on the Barnham / Westergate school area. The initial site assessment process has indicated that site options in the Ford area (outside the proposed site allocation) should be considered and policies within the Arun Plan should facilitate a new secondary school in this area.
- 2.16 Although secondary school provision was not a matter covered specifically within the Inspector's Interim Findings he did raise the issue of CIL pooling restrictions in relation to district-wide infrastructure, including secondary schools. The Council have acknowledged this and suggested modifications to Policy INF SPI (MM76) and in the text in MM77 to reflect how new secondary education provision will be funded. It is understood that WSCC's work is on-going with regard to a potential new secondary school at Ford.
- 2.17 The Council's 'Status of Strategic Allocation Sites as at 25th September [2017]' evidence to the EiP shows the first housing completions on the SD8 Site in the monitoring year 2019/20. Consistent with this evidence, we understand that the developer(s) associated with the SD8 Site are currently undertaking pre-application discussions with the LPA with a view to submitting a planning application in early 2018. Based on the initial indicative masterplan for the SD8 Site (published for consultation as part of the Ford Neighbourhood Plan process) a plan showing the broad location of the 2FE primary school and nursery is included as **Appendix 5**.

Policy H SP2c: Climping (SD10)

- 2.18 The Climping (SD10) site is allocated to deliver at least 300 dwellings over the LP period. Amongst other things, the submitted policy requires the on-site provision of a new 1FE (expandable to 2FE) primary school and nursery places.
- 2.19 However, the WSCC School Provision Update, September 2017 revises this on-site requirement to confirm that Section 106 contributions would be sought to expand the existing St Mary's Primary School in Climping. It is noted that the Inspector's Interim Findings confirms (paragraph 24) that 'as a result of a planning application at Climping is to be through the expansion of the existing school rather than a new school [sic]'.
- 2.20 The Council's 'Status of Strategic Allocation Sites as at 25th September [2017]' evidence to the EiP shows the first housing completions on the SD8 Site in the monitoring year 2018/19. However, the LPA recently refused an outline planning application for up to 300 dwellings on the site in September 2017 (Planning Application Reference: CM/1/17/OUT). Given this planning application is now the subject of a Section 78 planning appeal, first housing completions on the SD8 Site are now unlikely until the monitoring year 2019/20.

Other WSCC School Provision Update Matters

- 2.21 Having analysed the proposed primary school provision table within the WSCC School Provision Update, September 2017 (paragraph 4) we make the following observations:
- (i) With the exception of the Application Site (SD7), on-site provision is required on sites delivering 800 or more dwellings, or if smaller than 800 dwellings the on-site provision is specifically linked to another strategic site delivering 800 or more dwellings.
 - (ii) With the exception of the Application Site (SD7), individual strategic allocations of 400 dwelling or less are required to provide off-site contribution provision.
 - (iii) With the exception of the Application Site (SD7), all 1FE primary schools are required to be expandable to 2FE.
 - (iv) The SD6 Fontwell site (400 dwellings capacity) is required to make an off-site financial contribution to a ½ FE (105 places) expansion in the Westergate / Barnham locality, for primary education.

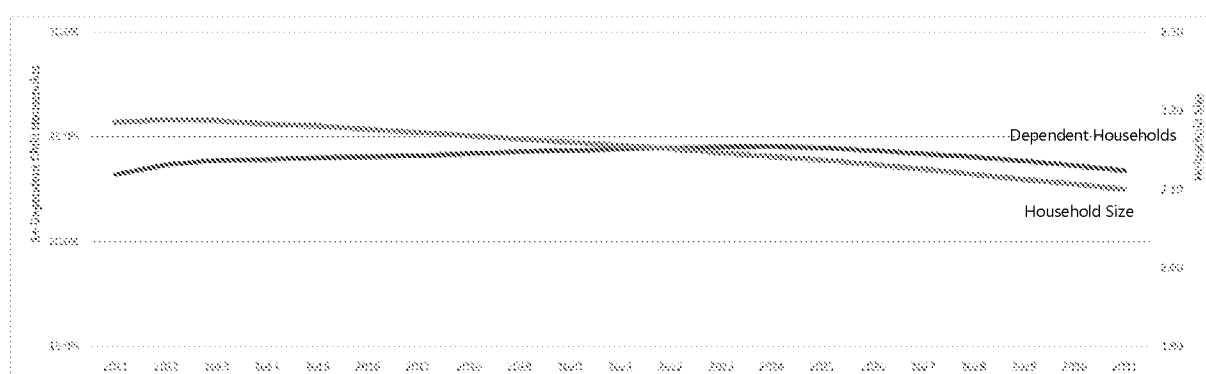
Arun: Housing Need

- 2.22 Underpinned by detailed demographic modelling, the Objectively Assessed Need for Housing: Arun District, March 2015 report ("the Arun OAN Report 2015") recommends (Table 30) the following mix of housing sizes over the LP period:

Dwelling Size	Market Homes	Affordable Homes	All Dwellings
1-bed	10%	35-40%	20%
2-bed	45%	30-35%	40%
3-bed	35%	20-25%	30%
4+ bed	10%	5-10%	10%

- 2.23 As illustrated within Graphic 1 below, the Department for Communities and Local Government ("DCLG") 2014-based household projections show that over the period covered by the LP (2011 to 2031) that household sizes within Arun are expected to decrease from an average of 2.19 persons per household to 2.10 persons per household.
- 2.24 Although there is some fluctuation over the period covered by the LP, the 2014-based household projections also show (Graphic 1) that the proportion of households with one or more dependent children within Arun is projection to remain broadly static at broadly 23% of all households.

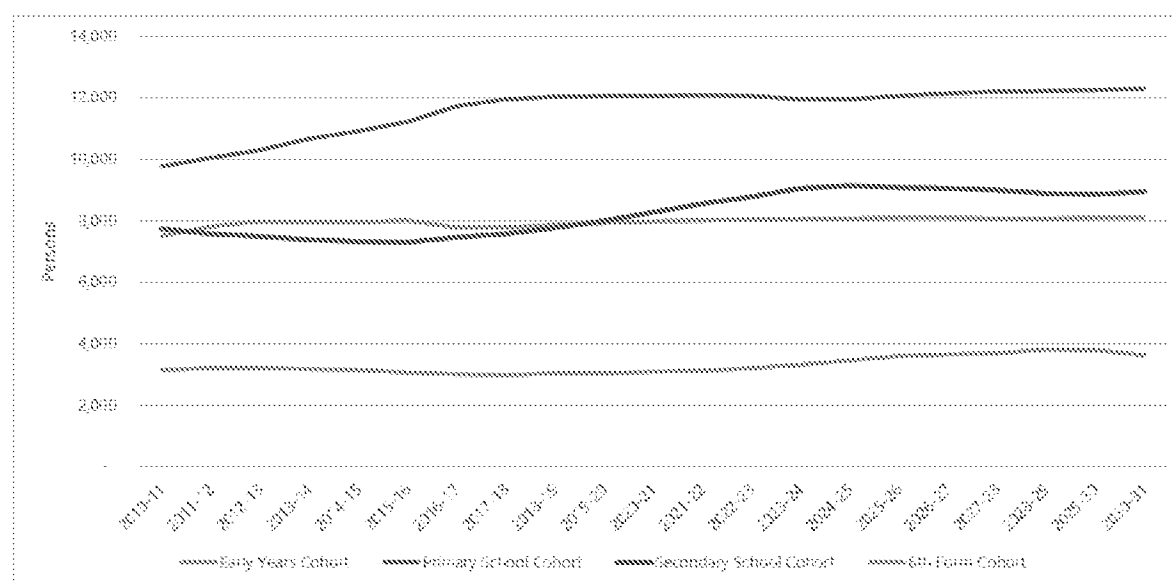
Graphic 1: Arun proportion of Households with 1+ dependent children and Average Household Size – 2011 to 2031



- 2.25 As illustrated within Graphic 2 and Table 2.1 below, annual average 'All Persons' population change within Arun over the LP period is 1,530 persons per annum. The dependent children population change being 237 persons per annum (15.5% of Arun's average annual 'All persons' population change). By comparing the annual rate of change between the 'All Persons' population and dependent children

population change within Arun, it is evident that the rate of dependent children population change (0.78%) is rising at a slower rate to the 'All Persons' population rate (0.93%). Overall it can be concluded that no significant demographic structure shift in the dependent children cohort is expected within Arun over the LP period.

Graphic 2: Dependent Children Projected Population Change for Arun 2010/11 to 2030/31



Source: MYE's between 2010/11 and 2015/16 then 2014-based SNPP thereafter

Table 2.1: Arun Population Change 2010-11 to 2030-31				
Cohort	2010-11	2030-31	Total Change 2010/11 -2030/31 (annual)	CAGR
Early Years Cohort	7,499	8,086	587 (29)	0.38%
Primary School Cohort	9,776	12,269	2,493 (125)	1.14%
Secondary School Cohort	7,749	8,948	1,199 (60)	0.72%
6th Form Cohort	3,155	3,614	459 (23)	0.68%
All Dependent Children	28,179	32,917	4,738 (237)	0.78%
All Persons	149,811	180,407	30,596 (1,530)	0.93%

- 2.26 Over the LP period the annual population change for the early years' cohort and 6th form aged cohort is projected to remain broadly at the 2010/11 level. Indeed annual population change for these cohorts is only 29 persons per annum for early years and 23 persons per annum for 6th form. The population change for the secondary school cohort follows broadly the same trend, albeit at a slightly higher annual rate of population change (60 persons per annum over the LP period).
- 2.27 The projected primary school cohort population change within Arun over the LP period is 125 persons per annum. This representing 52.7% of the projected dependent children population change. However, what is evident from Graphic 2.1 is that there a notable projected rise in primary school age population between 2015/16 to 2016/17 from 11,200 to 11,700 (500 persons), but then from 2017/18 onwards remains broadly constant at circa 12,000 (annual average change of 40 persons). The spike in primary school population change within Arun has effectively already taken place.

Yapton Neighbourhood Plan

- 2.28 The Yapton Neighbourhood Plan ("YNP") was 'made' on 5 November 2014 following a successful referendum outcome in October 2014. With regard to Yapton CE Primary School the YNP states (paragraph 2.29) that "*WSCC has confirmed that the site does have the possibility to expand the school to be a two-form-entry school admitting sixty children per year group. However, such an expansion would be expensive and would only be likely to be approved and funded if the need was acute.*"

Planning Policy Context Summary Conclusion

- 2.29 The Council's LP Main Modifications outlines that if the need is generated the Application Site should either (a) Provide a one-form primary school and nursery places; or (b) Make a contribution towards new facilities or improvement or expansion of relevant existing facilities.
- 2.30 Due to the continued lack of any evidence from WSCC to justify on-site provision of a 1FE primary school and nursey places on the Application Site there are outstanding objections to the LP from the Applicants and Yapton Parish Council.
- 2.31 There is common ground between the Council and the Ford strategic development site (SD8) developers/ landowners that on-site provision will be made for a 2FE primary school and nursery places. A planning application for the Ford site is expected in early 2018 with first completions in the monitoring year 2019/20.

- 2.32 The Council's LP evidence base sets out recommended housing size mix ranges for market houses, affordable houses and overall housing.
- 2.33 The 2014-based household projections indicate that the proportion of households within one or more dependent children within Arun will remain static at broadly 23% of all households. The 2014-based population projections indicate that no significant demographic structural change for the dependent children cohort is expected over the LP period.

3.0 Education Facility Requirement Guidelines

- 3.1 The following WSCC guidance documents are considered relevant to assessing education need arising from the Application Site.

Planning School Places

- 3.2 The WSCC Planning for School Places, 2017 ("WSCC PSP, 2017") (**Appendix 6**) states that its purposes is to set out the policies and principles behind the school planning process in West Sussex. It is intended to provide information on current organisation and future forecasts of pupil numbers and provisional plans for where additional school places will be made available.
- 3.3 It provides information for school leaders and other interested parties, such as district and borough planning departments and housing developers, about the supply and demand for school places in West Sussex maintained schools, academies and free schools.
- 3.4 The following key principles and policies are noted from the WSCC PSP, 2017:
- (a) Schools in West Sussex are considered to be at capacity when the number of pupils in relation to the capacity is equal to or exceeds 95%, which is in line with the National Audit Office report on Capital Funding for new school places published in 2013.
 - (b) For primary schools, wherever possible:
 - All-through primary schools (ages 4-11) should be established;
 - They should have a minimum of 1FE, 210 places and ideally a maximum of 3FE, 630 places, although recent guidance from the Department for Education suggests new primary schools should ideally be no smaller than 2FE, 420 places; and
 - The pattern of schools should ensure that a primary school is readily accessible to its pupils and, in urban areas, within walking distance of the homes of the majority of its children. Reference is made the LEA's statutory duty on providing transport to school for children under the age of 8 if they live more than two miles, and pupils over the age of 8 if they live more than three miles (measured as the shortest available walking route) from their

catchment school.

- (c) New primary education provision should be located within housing developments that are large enough to support their own provision.
- (d) Wherever possible, new school provision should be located in proximity to other community facilities, as part of a focus for new development.

Planning Obligations: Explaining Contribution Calculations

- 3.5 With regard to education and schools, the following principles are noted within the Planning Obligations: Explaining Contribution Calculations, October 2016 Update ("WSCC, ECC Note, 2016")
- (Appendix 7):**

- (a) The housing and population characteristics of the wider areas will provide a guide in the assessment of the likely age profiles and additional children arising from the proposed development. The average standards [assumed to be West Sussex wide] are:

School Type	Child Product
Primary (ages 4 to 11)	25 per 100 dwellings
Secondary (ages 11 to 16)	18 per 100 dwellings
Secondary (ages 16 to 18)	4 per 100 dwellings

- (b) The WSCC calculator (for Arun) is used for smaller developments up to an including 500 units where contributions are sought for the improvement and expansion of existing schools. Strategic developments of more than 500 homes are subject to bespoke negotiation.
- (c) Early years' provision should be included alongside new primary school sites.

- 3.6 Although the WSCC ECC Note 2016 states that the WSCC calculators are only used for development up to an including 500 units, we note from our involvement with other large scale strategic sites within West Sussex (sites over 500 dwellings) that WSCC use the calculators to help determine the expected pupil yields arising from the proposed development housing mix.

Other Relevant Guidance

- 3.7 When expanding existing or building new schools the Department for Education (“DfE”) Area guidelines for mainstream schools: Building Bulletin 103, June 2014 (“BB103”) provides the minimum and maximum building and land area standards.

Education Facility Guidelines Summary Conclusion

- 3.8 DfE and WSCC guidance states that new primary schools should ideally be no smaller than 2FE.
- 3.9 In providing new education facilities WSCC guidance seeks to ensure they are:
- (a) Readily accessible through being within walking distance of the homes of the majority of its children. Walking distances are measured as the shortest available walking route. For children under 8-years the maximum walking distance is 2-miles and for children over 8-years 3-miles.
 - (b) Located within housing development that are large enough to support their own provision (i.e. self-supporting);
 - (c) Located in proximity to other community facilities, as part of a focus for new development.
- 3.10 WSCC S106 calculators are principally used for smaller developments up to and included 500 units. However, it is noted from wider experience within West Sussex that WSCC also use these calculators to help determine the expected pupil yields arising from strategic sites (501+ unit sites) at the detailed planning application stage.
- 3.11 DfE Design Bulletin 103 provides the minimum and maximum building and land area standards that should be applied to both extending existing schools and delivering new schools.

4.0 Existing Education Provision Context

- 4.1 The existing education provision context relevant to the Application Site and Proposed Development is set out below:

Primary Schools

- 4.2 Based on the WSCC PSP, 2017 two-mile walkability zone principles our analysis demonstrates that the Yapton CE Primary School and Barnham Primary School are the existing primary schools within the Barnham / Westergate Locality that are within a 2-mile walk of the Application Site (**Appendix 8**).

Yapton CE Primary School

- 4.3 Yapton CE Primary School currently has 1.5FE, which is below the WSCC and DfE recommended 2FE minimum. Accordingly, and as confirmed within the WSCC PSP, 2017, the net capacity of the school is currently 315 pupils. Based on the WSCC 95% capacity assumption, the school will be considered by WSCC to be at capacity once the number on roll ("NOR") reaches 299 pupils. The WSCC PSP, 2017 states that the NOR in October 2016 was 266 pupils. Indicating headroom of 33 places.
- 4.4 Although Yapton CE Primary School has some existing capacity (33 places), it is also noted that within the SEDP7 schedule, WSCC confirm that the school can expand by ½ FE within the existing site area. Indeed WSCC have already secured S106 contributions that specifically contribute towards the expansion of the school. Expansion to a 2FE school will provide an additional ½FE (105 pupil places). This ½FE expansion will also achieve the WSCC and DfE recommended 2FE minimum primary school operating size.
- 4.5 Given the above, it is taken that the headroom capacity of Yapton CE Primary School is 138 places (33 existing headroom and 105 places through the committed ½FE expansion).
- 4.6 Regarding the expansion of Yapton CE Primary School, it is noted that as part of the pending planning application at Land at Staker's Farm, North End Road, Yapton (Planning Application Reference: Y/44/17) (**Appendix 9**), that a 0.15ha of land is being offered as a 'gift' to the Yapton CE Primary School.

- 4.7 With regard to further expansion potential above 2FE at Yapton CE Primary School, the additional minimum standards land requirements to expand the school to a 2.5FE or a 3FE are summarised within Table 4.1 below:

Table 4.1: Further expansion land requirements based on DB103 minimum total site area standards					
Expansion	Additional Pupil Capacity	Base area (m ²)	Area Per Pupil (m ²)	Area Required	
				m ²	Ha.
0.5FE Expansion (expansion to 2.5FE)	105	N/A*	33.3	3,497	0.35
1FE Expansion (expansion to 3FE)	210	N/A*	33.3	6,993	0.70

*Based area is not required due to existing buildings (DB103, page 4)

- 4.8 What is evident from Table 4.1 above is that in addition to the 0.15ha. of gifted land currently being offered as part of the Land at Stakers Farm planning application a further 0.2ha. of land would be required to expand the school to 2.5FE and 0.55ha. of land to expand to 3FE.
- 4.9 In light of this, and particularly given the local community wishes to maintain only a single primary school within Yapton, it would appear prudent for the Council to ensure that sufficient undeveloped land surround the existing school site is safeguarded for further expansion up to a 3FE. Objections by the applicants at the Arun EiP asked for land adjacent to school to be safeguarded for this purpose as part of the modifications to the LP to facilitate the community's wishes.
- 4.10 As previously referred, is it regrettable that WSCC has failed to provide the LP Inspector with the requested information on the potential scope to extend Yapton CE Primary School further than a 1.5FE school to meet the communities wish, there is demonstrably undeveloped adjoining land available that could enable the school to expand to the 2.5 FE and potentially the optimum 3FE size.
- 4.11 To assist the consideration of this application and the Arun EiP, the Applicants have commissioned a feasibility study of the existing Yapton CE School site and the adjoining undeveloped greenfield land to assess the extent to which the school can be expanded to up to 3FE. This feasibility report will be completed in early 2018.
- 4.12 Should the feasibility study in due course confirm that there is potential to expand the school to either a 2.5FE or a 3FE then Applicants will make appropriate representations, on this matter, to the Main Modifications consultation. As this is an outstanding LP matter being considered as part of the open

LP Examination, the Council should not seek to determine any development proposals on the Staker's Farm site (the adjoining greenfield land) that would prejudice the potential expansion of the school site, until the LP process has concluded in April 2018.

Barnham Primary School

- 4.13 Barnham Primary School currently has 1.5FE, which like Yapton CE Primary School is below the WSCC and DfE recommend 2FE size standards. Accordingly, and as confirmed within the WSCC PSP, 2017, the net capacity of the school is currently 315 pupils. Based on the WSCC 95% capacity assumption, the school will also be considered by WSCC to be at capacity once the NOR reaches 299 pupils. The WSCC PSP, 2017 states that the NOR in October 2016 was 310 pupils. Indicating over capacity of 11 places.
- 4.14 It is noted that WSCC have not sought S106 contributions within the locality towards expanding Barnham Primary School from 1.5FE to a 2FE school. It is therefore assumed that WSCC have assessed and concluded that Barnham Primary School cannot be expanded.
- 4.15 Overall, for the purposes of this assessment, the starting point of current capacity of primary schools (namely Yapton CE Primary School) within the 2-mile walkability zone of the Application Site is taken to be 127 places.

Known Yapton Commitments

- 4.16 Given the passage of time from the base date of the WSCC PSP, 2017 (October 2016), we have analysed Arun's planning history and the Planning Inspectorate's planning appeal records to identify more recent planning approvals for housing development within Yapton (the 2-mile walkability zone of the Application Site and Yapton CE Primary School) ("the Known Commitments"). Details of the identified Known Commitments are summarised within Table 4.2 below:

Table 4.2: Approved Housing Applications within the Application Site two-mile walkability zone		
Application Reference	Site Name / Address	Approved Dwellings
Y/53/16/PL	Yapton Metal Company, Burndell Road, BN18 0HP	4
Y/19/16/OUT	Land off Burndell Road	108
Y/1/17/OUT	Bonham's Field Main Road, BN18 0DX	56
F/7/15/OUT	Land south of Burndell Road, BN18 0HR	45
Y/93/14/OUT	Land North of Yapton C of E Primary School, BN18 0DU	38
Total Approved Dwellings		251

- 4.17 Having analysed the Known Commitments planning permissions and Section 106 Agreements we are able to confirm the specific housing mix associated with each Known Commitment (**Appendix 10**). The aggregated housing mix for the Known Commitment developments is set out within Table 4.3 below:

Table 4.3: Known Commitment Aggregated Housing Mix	
Dwelling Size	Total Dwellings
1-bed	41
2-bed	100
3-bed	81
4+ bed	29
Total Dwellings	251

- 4.18 Based on the Known Commitments housing mix (Table 4.3) we have calculated, using the WSCC S106 calculator for Arun that the resulting primary school pupil yield is 47 pupils.
- 4.19 Once the Known Commitments are taken into account, we calculate that the current capacity of primary schools (namely at Yapton CE Primary School) within the two-mile walkability zone of the Application Site reduces to 80 places.

Pending Commitments

- 4.20 As part of our planning history and appeal record analysis, we identified a further five housing development proposals within Yapton that are either pending determination by the LPA or are the subject of an on-going Section 78 Appeal ("the Pending Commitments"). Details of the identified Pending Commitments are summarised within Table 4.4 below:

Table 4.4: Pending Housing Commitments within the Application Site two-mile walkability zone		
LPA Application Reference	Site Name / Address	Pending Dwellings
Y/5/17/OUT	Cinders Nursery & Land R/O Cinders Lane	51
Y/49/17/OUT	Land at Street Buildings North End Road	45
Y/44/17/OUT	Land at Staker's Farm	70
Y/32/17/OUT	Land at Southern End of Cinders Lane	19
Y/80/16/OUT	Land to the south of Ford Lane, East of North End Road	100
Total Pending Dwellings		285

4.21 Although these are not currently firm housing commitments, for completeness we have also assessed the implication of these Pending Commitments on the current education provision capacity, should they ultimately be approved, and become Known Commitments.

4.22 The aggregated housing mix assumed for the Known Commitment developments is set out within Table 4.5 below (**Appendix 11**):

Table 4.5: Assumed Pending Housing Mix			
Dwelling Size	Total Dwellings	Total Flats	Total Units
1-bed	30	12	42
2-bed	96	3	99
3-bed	117	0	117
4+ bed	27	0	27
Total Dwellings	270	15	285

4.23 Our analysis using the WSCC S106 calculator demonstrates that if all of the Pending Commitments were approved the resulting aggregated primary school pupil yield would be 55 pupils. This would reduce the current capacity of primary schools (namely at Yapton CE Primary School) within the two-mile walkability zone of the Application Site to 25 places.

Secondary School (ages 16-18)

- 4.24 Based on the WSCC PSP, 2017 three-mile walkability zone principles our analysis demonstrates that the Ormiston Six Villages Academy and the St Philip Howard High School are the existing secondary schools within the Barnham / Westergate Locality that are within a three-mile walk of the Application Site (**Appendix 12**).

Ormiston Six Villages Academy

- 4.25 The WSCC PSP, 2017, states that the Ormiston Six Villages Academy currently has a net capacity of 823 pupils. Based on the WSCC 95% capacity assumption, the school will be considered by WSCC to be at capacity once the NOR reaches 782 pupils. The WSCC PSP, 2017 states that the NOR in October 2016 was 549 pupils. Indicating headroom capacity of 233 places.

St Philip Howard High School

- 4.26 The WSCC PSP, 2017, states that the St Philip Howard High School currently has a net capacity of 1,033 pupils. Based on the WSCC 95% capacity assumption, the school will be considered by WSCC to be at capacity once the NOR reaches 981 pupils. The WSCC PSP, 2017 states that the NOR in October 2016 was 974 pupils. Indicating headroom capacity of 7 places.
- 4.27 Although St Philip Howard High School has limited existing capacity, it is noted that WSCC is securing Section 106 contributions from developments within Yapton to contribute towards the expansion of both the secondary school and the sixth-form.
- 4.28 Overall, for the purposes of this assessment, the starting point capacity of secondary schools within the 3-mile walkability zone of the Application Sites is taken to be 240 places.

Known Commitments

- 4.29 Based on the Known Commitments housing mix (Table 4.2) we have calculated, using the WSCC S106 calculator for Arun, that the resulting secondary school pupil yield (ages 16 to 18) is 41 pupils.
- 4.30 Once the Known Commitments are taken into account, we calculate that the current capacity of secondary schools within the three-mile walkability zone of the Application Site reduces 199 places.

Pending Commitments

- 4.31 Our analysis of the Pending Commitments (Appendix 10) demonstrates that if all of the Pending Commitments were approved the resulting aggregated secondary school pupil yield (ages 16 to 18) would be 48 pupils. This would reduce the current capacity of secondary schools within the three-mile walkability zone of the Application Site to 151 places.

Early Years

- 4.32 A review of early years' provision within Yapton suggests that there are limited existing facilities:

- Yapton Community Pre School, North End Road, Yapton; and
- Happy Days Playschool, Scout Hut, Drove Lane, Yapton

- 4.33 Whilst the Happy Days Playschool, Drove Lane operates from the Scout Hut, as referred above it is noted that the WSCC, ECC Note, 2016 states that early years' provision should be included alongside new primary schools i.e. there is a presumption against, where possible, standalone year-year facilities. In accordance with the WSCC PSP, 2017 principles, one reason for integrating new early years' facilities with new primary schools is likely to relate to WSCC objective of locating new schools in proximity to other community facilities, as part of a focus for new development.

- 4.34 Anecdotal local evidence, via consultation responses to the Proposed Development public consultation, suggests that there is currently a shortfall of early years' provision within Yapton.

Existing Education Facility Summary Conclusion

- 4.35 Our analysis of the baseline education facility capacity, with known housing commitments and also with pending commitments, suggests that there is existing primary school and secondary school capacity before the WSCC 95% capacity threshold is reached.
- 4.36 In the absence of any formal record of early years capacity and existing need it is not possible quantify the baseline capacity surplus / deficit. However, anecdotal local evidence would suggest that there is a deficit of early years places within Yapton.
- 4.37 Overall, the existing education facility capacity situation is summarised within Table 4.5 below:

Table 4.5: Existing Education Capacity			
Education Facility	Baseline Capacity	Capacity With Known Commitments	Capacity With Known and Pending Commitments
Early Years	Unknown	Unknown	Unknown
Primary School	127	80	25
Secondary School	240	199	151

- 4.38 Although WSCC has failed to provide the LP Inspector with the requested further information on the scope to expanding Yapton CE Primary School, there is undeveloped land adjoining the existing school site that could enable to the school to expand further to a 2.5FE or possibly a 3FE. In light of the objection to a second primary school in the village by the local community, led by the Parish Council, it is imperative for the Council to fully investigate this expansion potential before determining any development proposals of the adjoining land that if approved would prejudice further school expansion. To assist this application and the LP examination the Applicants have commissioned feasibility study of the existing school site and adjoin land. This study will be completed in early 2018.

5.0 The Proposed Development

- 5.1 The Proposed Development on the combined Application Sites comprises 550 dwellings. Based on the pre application responses (LPA Reference: PAA/148/17) associated with the Proposed Development; the Arun OAN Report 2015 recommendations; and emerging LP Policy AH SP2, the assumed housing mix set out within Table 5.1 below has been used to derive the expected pupil yields arising from the Proposed Development.

Table 5.1: The Assumed Proposed Development Policy Compliant Housing Mix	
Dwelling Size	Total Dwellings
1-bed	110 (20%)
2-bed	220 (40%)
3-bed	165 (30%)
4+ bed	55 (10%)
Total Dwellings	550

- 5.2 If the above mix is applied as 100% houses it would represent a worst case scenario. The reason being, as illustrated within Table 5.2 below, a mix based on 100% houses yields significantly higher levels resident dependent children compared to flats of equal bedroom size.

Table 5.2: Pupil Places Required for 10 x 1-bed, 10 x 2-bed, 10 x 3-bed and 10 x 4+ bed dwellings - House and Flat comparison				
Education Facility	Pupil Places Required			
	Houses	Flats	Difference	%
Primary School (ages 4-15)	7.25	2.49	4.76	191%
Secondary School (ages 15-18)	6.30	2.16	4.14	192%

Source: Calculations based April 2017 WSCC S106 Calculator for Arun

- 5.3 As set out within Table 5.3 below, analysis of Census 2011 data shows that the dwelling stock within Arun and West Sussex more widely comprises broadly 78% houses and 22% flats. However, more specifically within the Application Site's education walkability catchment zones, (based on Output Areas) the dwelling stock comprises broadly 89% houses and 11% flats.

Table 5.1: Census 2011 House and Flat Mix Analysis		
Geography	Dwellings	Flats
West Sussex	77.9%	22.1%
Arun District	77.5%	22.5%
Application Site Catchment Area	88.6%	11.4%

Source: Census 2011 Table KS401UK

5.4 Given the above, the housing mix for the Application Site set out within Table 5.1 therefore demonstrably represents a 'worst case' policy compliant housing mix scenario for assessing expected pupil yields arising from the Proposed Development.

5.5 As set out within Table 5.4 below, based on the worst-case (100% houses) policy compliant housing mix (Table 5.1) we have calculated, using the WSCC S106 calculator for Arun, the resulting pupil yields arising from the Proposed Development on the Application Site:

Table 5.4: Proposed Development Pupil Yield	
Education Stage	Pupil Yield
Early Years	28
Primary School (ages 4-11)	98
Secondary School (ages 11-18)	85

5.6 We have also assessed the impact of the Proposed Development based on a conservative 90% house and 10% flat assumption applied to the housing mix set out within Table 5.1. A summary of the pupil yield outputs are provided within Table 5.5 below:

Table 5.5: Proposed Development Pupil Yield with House / Flat or YNP Policy H2 Mix Assumptions	
Education Stage	House / Flat Mix Scenario Pupil Yield
Early Years	26
Primary School (ages 4-15)	91
Secondary School (ages 15-18)	79

Proposed Development Summary Conclusion

- 5.7 The WSCC pupil yield calculators confirm that a policy compliant housing mix on the Application Site would result in the following pupil yield ranges:

Table 5.6: Proposed Development Pupil Yield Range		
Education Stage	100% Houses Pupil Yield	90% Houses / 10% Flats Pupil Yield
Early Years	28	26
Primary School (ages 4-11)	98	91
Secondary School (ages 11-18)	85	79

6.0 Ford (SD8) Site

- 6.1 As previously referred, the Ford (SD8) Site is allocated to deliver at least 1,500 dwellings over the LP period. Amongst other things, the policy requires the on-site provision of a new 2FE primary school (420 places) and nursery places.
- 6.2 We understand that the developer(s) associated with the SD8 Site are currently undertaking pre-application discussions with the LPA with a view to submitting a planning application in early 2018. Consistent with this timeframe the Council's 'Status of Strategic Allocation Sites as at 25th September [2017]' evidence to the EiP shows the first housing completions on the SD8 Site in the monitoring year 2019/20. There is no evidence to suggest that this housing trajectory is not realistic.
- 6.3 As illustrated within the initial indicative masterplan for the SD8 Site (Appendix 5) the broad location of the 2FE primary school and nursery will be located within the primary school two-mile walkability zone of the Application Site (Appendix 8). In light of this, the education implications associated with the Ford (SD8) Site have also been analysed.
- 6.4 Based on the same 'worst case' policy compliant housing mix approach as that applied within our assessment of the Proposed Development, the assumed 'worst case' housing mix for the Ford (SD8) Site is set out within Table 6.1 below:

Table 6.1: The Assumed Ford (SD8) Site Policy Compliant Housing Mix	
Dwelling Size	Total Dwellings
1-bed	300 (20%)
2-bed	600 (40%)
3-bed	450 (30%)
4+ bed	150 (10%)
Total Dwellings	1,500

- 6.5 Based on the worst-case (100% houses) policy complaint housing mix (Table 6.1) we have calculated, using the WSCC S106 calculator for Arun, that the resulting pupil yields for the Ford (SD8) Site. A summary of the pupil yields are provided within Table 6.2 below.

Table 6.2: Ford (SD8) Site Assessed Pupil Yield	
Education Stage	Pupil Yield
Early Years (0-4)	76
Primary School (ages 4-15)	266
Secondary School (ages 15-18)	231

- 6.6 We have also calculated the impact of the Ford (SD8) Site based on a conservative 90% house and 10% flat assumption applied to the housing mix. A summary of the pupil yield outputs are provided within Table 6.3 below:

Table 6.3: Ford (SD8) Site Assessed Pupil Yield with House / Flat Mix Scenario	
Education Stage	Pupil Yield
Early Years (0-4)	73
Primary School (ages 4-15)	255
Secondary School (ages 15-18)	222

- 6.7 As illustrated within Table 6.4 below, based on the pupil yield arising from Ford (SD8) Site, the 2FE primary school will have between circa. 33.3 and 36.1% capacity headroom before reaching the WSCC 95% capacity assumption. Table 7.3 also shows that delivery of a 90-place early years' facility linked to the 2FE primary school would have between circa. 11.6 and 15.1% capacity headroom before reaching the WSCC 95% capacity assumption.

Table 6.4: Ford (SD8) Site Assessed Pupil Yield						
Education Stage	Net Capacity	WSCC 95% Net Capacity	100% House		90% Houses 10% Flats	
			Pupil Yield	Headroom (up to WSCC 95% capacity)	Pupil Yield	Headroom (up to WSCC 95% capacity)
Early Years	90	86	76	10 (11.6%)	73	13 (15.1%)
2FE Primary School	420	399	266	133 (33.3%)	255	144 (36.1%)

Ford Site Summary Conclusion

- 6.8 The WSCC pupil yield calculators confirm that a policy compliant housing mix on the Ford Application Site would result in the following pupil yield ranges:

Table 6.5: Proposed Development Pupil Yield Range		
Education Stage	100% Houses Pupil Yield	90% Houses / 10% Flats Pupil Yield
Early Years	76	73
Primary School (ages 4-11)	266	255
Secondary School (ages 11-18)	231	222

7.0 Education Analysis Conclusion

- 7.1 The Council's LP Main Modifications outlines that if the need is generated the Application Site should either (a) Provide a one-form primary school and nursery places; or (b) Make a contribution towards new facilities or improvement or expansion of relevant existing facilities.
- 7.2 Due to the continued lack of any evidence from WSCC to justify on-site provision of a 1FE primary school and nursey places on the Application Site and given there are outstanding objections to the LP from the Applicants and Yapton Parish Council it would appear that on site provision is not justified. Indeed the delivery of a new stand alone 1FE sized primary school contradicts WSCC own education facility provision guidelines as well as guidance from the DfE.
- 7.3 It is regrettable that WSCC has also failed to provide the LP Inspector with the requested information on the potential scope to extend Yapton CE Primary School further than a 1.5FE school. There is demonstrably space within the site and undeveloped adjoining land available that could potentially enable the school to expand to either a 2.5FE or 3FE. The applicants recommended that this land be safeguarded in a Local Plan modification at the EiP.
- 7.4 Given, an expansion from a 2FE to a 2.5FE school would increase capacity by a further 105 places; and an expansion from a 2FE to a 3FE school would increase capacity to a further 210 places any additional expansion potential at Yapton CE Primary School would provide sufficient headroom capacity to accommodate
- (i) The Proposed Development (550 dwellings);
 - (ii) Known housing commitments (251 dwellings); and
 - (iii) Pending commitments (285 dwellings) should they ultimately be approved in due course.
- 7.5 To assist this planning application and the LP examination, the Applicants have commissioned a feasibility study of the existing school site and adjoining land. In light of the strong objection by the local community to expand the existing primary school within Yapton rather than have a second primary school, it is imperative for the Council to fully investigate this expansion potential before determining any development proposals of the adjoining land, which if approved would prejudice further expansion of Yapton CE Primary School. The feasibility report will be completed in early 2018

and will be submitted to the LPA, WSCC and the LP examination via the forthcoming Main Modifications consultation process and as evidence to support this planning application.

7.6 Notwithstanding any further expansion potential of Yapton CE Primary School, if this is not possible for any reason, the analysis within this report also demonstrates that through the existing confirmed ½ form expansion of Yapton CE Primary School and the delivery of the 2FE primary school on the Ford strategic development site that there is sufficient primary school capacity to accommodate the anticipated pupil yield arising from:

- (i) The Proposed Development (550 dwellings);
- (ii) The Ford strategic development proposals (1,500 dwellings);
- (iii) Known housing commitments (251 dwellings); and
- (iv) Pending commitments (285 dwellings) should they ultimately be approved in due course.

7.7 With the Proposed Development being located within a two-mile walkability zone of the Ford strategic site, primary school Section 106 contributions would assist in the delivery of the 2FE primary school on the Ford site.

7.8 The analysis within this report also demonstrates that within a three mile walkability zone surrounding the Application Site that there currently appears to be sufficient secondary school capacity to accommodate the projected pupils arising from the Proposed Development and the known and pending housing commitments within Yapton.

7.9 There appears to be limited existing early years' provision within Yapton and the Proposed Development will generate demand for between 26-28 early year places. However, in light of the fact that WSCC guidance seeks to deliver new early years' facilities linked to new primary schools it is not considered appropriate to deliver a standalone early years facility on the Application Site. The feasibility study of the Yapton CE Primary School site and the adjoining greenfield land will also assess the potential to also expand the existing Yapton Community Pre School which is within the grounds of the Yapton CE Primary School. A contribution towards this facility, secured through s106, would meet the requirements generated by the development.

Appendices

Appendix 1: WSCC School Provision in Arun District Update

Appendix 2: Arun Local Plan Inspectors Interim Findings

Appendix 3: Arun District Council's Main Modifications

Appendix 4: Examination Document SEDP7

Appendix 5: Ford Indicative Masterplan

Appendix 6: WSCC Planning for School Places, 2017

Appendix 7: Planning Obligations: Explaining Contribution Calculations, October 2016 Update

Appendix 8: Application Site two-mile walkability zone

Appendix 9: Planning application reference Y/44/17 masterplan showing 'gifted' land

Appendix 10: Known commitments housing mix

Appendix 11: Pending commitments housing mix

Appendix 12: Application Site three-mile walkability zone

Appendix 1

WSSC School Provision in Arun District Update

School Provision in Arun District: Update

Prepared by: West Sussex County Council

September 2017



Introduction

This document is an update to the WSCC document; "School Provision in Arun District (Feb 2017)".

School Provision in Arun District

1. There are 36 primary schools in Arun district and six secondary schools, of which five have post 16 provision. The district is broken down into four planning areas, Angmering, Barnham/Westergate, Bognor/Felpham and Littlehampton (localities) and the schools are divided into these areas in line with their geographical location.
2. The County Council is the Local Education Authority (LEA) for West Sussex. The County Council also has a statutory duty to ensure that there is sufficient and appropriate education provision across West Sussex. It discharges this duty in partnership with diocesan authorities and other education providers. Therefore, before a site is selected, there is a need for informal consultation (separate from the Local Plan process) with local stakeholders, including elected members and education providers on any site options. The views of local stakeholders will be taken into account before the County Council sets out its position on any options.

Locations for primary schools

3. Forecasting pupil numbers is based on a number of factors, such as birth data, migration trends and on the anticipated future housing numbers. However, this is by no means an exact science and we are continually reviewing our methodology, as sources of alternative data become available.

Primary School Provision

4. The proposed strategic housing allocations were used to determine the locations for primary schools.

Strategic Site Location	Proposed Primary School Requirement	Location	To Serve	Capacity
Greater Bognor Regis Urban Area				
SD1 Pagham South	Provision of land and contributions towards 1 FE Primary School expandable to 2FE to be delivered in conjunction with Pagham North.	On site SD1 or SD2	SD1 and SD2	400
SD2 Pagham North	Contributions towards 1 FE Primary School expandable to 2FE to be delivered in conjunction with Pagham South.	On site SD1 or SD2	SD1 and SD2	800
SD3 West of Berstead	Provision of 3FE primary to serve West of Bersted.	On site	West of Berstead	2,500
Greater Littlehampton Urban Area				
SD4 Littlehampton West Bank	Provision of a 1.5FE primary school expandable to 2FE to serve West Bank Littlehampton.	On site	LEGA	1,000
Inland Arun				
SD5	Provision of two 2FE primary	On site	BEW	2,300

Barnham/Westergate/Westergate	schools comprising of a 2FE school and a 1FE school expandable to 2FE to serve BEW.			
SD6 Fontwell	Contribution to a ½ form of entry (FE) expansion in the Westergate/Barnham locality, for primary education.	Off site	BEW	400
SD7 Yapton	Provision of 1FE primary school.	On site	Yapton	400
SD8 Ford	Provision of new 2FE primary school.	On site	Ford	1,500
SD9 Angmering North	1FE primary school expandable to 2FE to be delivered in conjunction with Angmering South and East.	Existing school	SD9 or SD11	800
SD 10 Climping	Contributions to expansion of the existing primary school - St Marys Climping	Existing school	Climping	300
SD11 Angmering South and East	1FE primary school expandable to 2FE to be delivered in conjunction with Angmering North	On Site SD11	SD11	250

Secondary School Provision

- In the case of secondary schools, the County Council would normally wish to see schools operate at a minimum of six Forms of Entry (FE) or above¹, although we recognise that 4FE and 5FE secondary schools are currently well established and operating in West Sussex. In planning terms, an FE is 30 pupils, therefore a 6FE 11-16 secondary school would have five year groups of 180 and a total of 900 pupils on roll.
- To ensure the site is capable of being expanded in the future to meet the needs arising from demographic change and/or future housing development, the County Council would wish to ensure that sufficient land is available for future expansion to 10FE.

Site Size and Costs

- The Department of Education and Education Funding Agency have produced non-statutory area guidelines for mainstream school sites for all age ranges². The County Council use this document as a guide to minimum site size requirements for new schools within the County.
- Based on the formulae in this document, the recommended minimum site size requirement for a new 10FE secondary school is 10.5 hectares. Education Advisors strongly recommend that secondary schools do not exceed 10FE so this is considered to be the largest desirable size for a secondary school although this is not a legal requirement.
- The guidance document acknowledges that the site size requirements should be used as a guideline and that there may be cases where the standards cannot be met; "in

¹ Planning School Places (WSCC, 2016)

² Refer to Area Guidelines for mainstream schools Building Bulletin 103 (DfE, EFA, 2014)

line with policies which seek to increase choice and opportunity in state funded education, these guidelines will not necessarily have to be met in every case and should always be applied flexibly in light of the particular circumstances.”³

10. West Sussex County Council has identified the need, over the plan period, for a new 10FE Secondary School to mitigate the impact of the strategic development sites proposed. The estimated cost of this facility is between £42.1 and £47.7 million.
11. Justification for secondary school provision required (data used and assumptions made).
12. Forecasting pupil numbers is based on a number of factors, such as birth data, migration trends and on the anticipated future housing numbers. However, this is by no means an exact science and we are continually reviewing our methodology, as sources of alternative data become available.
13. In order to determine the need we have taken our current pupil projections, including any known committed housing developments across the Arun District. We then add on the proposed housing, based on Arun DC housing trajectory and build out rates, calculate the anticipated child product from these housing developments and added them to our projections.
14. When the projected pupil numbers exceeds the current school capacity (95%) this determines if/when it is anticipated a new school will be required. Currently our projections show that an increase in the secondary provision would require additional capacity to be provided in the academic year 2024/25. However if the housing from the Local Plan proceeds as per the housing trajectory provided by Arun District Council it is currently anticipated this requirement will be bought forward to 2020/21.

The identification of options

15. There are currently six secondary schools in the District that broadly serve the immediate area where they are located, (although it is recognised that pupils at secondary school age are prepared to travel a greater distance for education). The schools currently offer a cumulative total of 47 forms of entry. The proposed housing in the District will, by the end of the plan period, produce a further 14 forms of entry.

Secondary School	Current	Future	Capability to expand
The Angmering School	8FE	9FE	Limited land availability for further expansion
Ormiston Six Villages Academy	5FE	5FE	Limited potential to expand due to site constraints
St Philip Howard Catholic High School	5FE (PAN 150)	5FE (PAN 180)	Only expected to expand to meet the needs of the faith community
The Regis School	10FE	10FE	Already at maximum desirable size
Felpham Community College	8FE	10FE	Limited land availability for further expansion
The Littlehampton Academy	11FE	11FE	Already exceeds the maximum desirable size

³ Refer to page 3 of Area Guidelines for mainstream schools Building Bulletin 103 (DfE, EFA, 2014)

16. The existing schools currently have capacity to cater for an additional 4FE arising from planned development based on the most recent pupil projections, however it should be noted that this is subject to change and the numbers are reviewed twice a year.
17. The County Council consider that schools should be provided close to where the need arises, as this will encourage sustainable travel behaviour. The largest development-related increase in the pupil population in Arun District is expected to arise in the Barnham/Westergate school planning area, as this includes the proposed strategic site allocations at BEW, Ford, Fontwell and Yapton. The existing schools in this area have limited capacity for expansion to meet this need because one is a faith school (so can only be expected to expand to cater for the faith community) and the other could not be expanded by 10FE (as this would far exceed the maximum desirable secondary school size). For this reason an area of search for a site for new secondary school has been proposed based on the Barnham/Westergate school planning area. The initial site assessment process has indicated that site options in the Ford area (outside of the proposed site allocation) should be considered and policies in the Arun Local Plan should facilitate a new secondary school in this area.

West Sussex County Council
26 September 2017

Appendix 2

Arun Local Plan Inspectors Interim Findings

ARUN LOCAL PLAN EXAMINATION

INSPECTOR'S INTERIM FINDINGS FOLLOWING HEARING SESSIONS

Please reply to the Programme Officer

Introduction

1. The purpose of this note is to provide preliminary findings on some key issues and my views on the further Main Modifications (MMs) that are likely to be required to make the Arun Local Plan (LP) sound following the hearing sessions. The MMs are in addition to those already raised in my preliminary and additional questions and those being considered by the Council as a result of the hearing sessions. In addition to possible MMs the note seeks clarification/further information from the Council on some matters following the hearings, particularly in relation to documentation that was submitted just before or during the hearings.
2. I would also advise that I will give full consideration to all the representations made about the LP including the oral contributions at the hearings. My final conclusions regarding soundness and procedural compliance will be set out in the report to be produced following consultation on the proposed MMs. Nevertheless, having regard to the criteria for soundness and to assist at this stage, I shall provide brief explanations for my findings thus far.
3. My findings may alter in the light of any further evidence that emerges including the consultation process. My views are therefore given here without prejudice to the conclusions that will appear in the report. My final report will also cover other main issues that arose during the examination but which are not dealt with in this note.

Matter 1 – Procedural and Overarching Matters

Issue 1 - Duty to Cooperate

4. I have had regard to PELP27 – Duty to Cooperate (DtC) Statement Addendum April 2017 which details further engagement undertaken since the suspension of the examination, the Memoranda of Understanding submitted before and during the hearings and the other evidence provided by the Council e.g. the updated Local Strategic Statement (LSS2), the evidence gathering being undertaken for LSS3 and the production of the Arun Place Plan by West Sussex County Council. It would have been preferable for these strands of evidence to be set out in a composite document but this is not a significant consideration in whether or not the DtC has been met.
5. Other Councils are at different stages of plan preparation. Therefore, whilst the unmet development needs of Chichester are clear, the extent to which Worthing and Adur can meet their needs has not been decided. That said some unmet needs from those two Councils are likely to exist. In the context of the DtC the Council's acceptance that it should meet some of the unmet needs from elsewhere within the sub-region demonstrates effective cooperation. Moreover,

the LP is being examined at a point in time and the DtC evidence can only reflect that. Engagement will be ongoing.

6. I am satisfied that the Council has engaged constructively and complied with the Duty to Cooperate.

Issue 2 - Consultation

7. There has been criticism of the Council's approach to consultation, particularly in relation to engaging with local communities and residents on the significant modifications proposed following the suspension of the examination in February 2016. However, the Council has met the requirements in the regulations¹ relating to publication of the modified Plan over a 6 week period, seeking and considering representations and submitting documents to the Secretary of State (SoS). It is beyond the scope of the examination to require that the Council go back and do more.

Matter 2 - The Strategic Approach, Settlement Structure and Green Infrastructure

Issue 2 – Gaps between Settlements

8. There was discussion about the Angmering/Worthing Gap at Hearing Session 2. The Council's statement referred to the Hankinson Duckett Associates report (PESP3) as evidence to support the gaps. However, PESP3 did not refer to this particular gap. The Landscape Capacity Study refers to 'separation between settlements' in its annotations but does not appear to specifically analyse the significance of this or other gaps. Reference was made to a committee meeting of 28 November 2013 (ADCED62). Section 2 of the Background Paper attached to the meeting's agenda provides some explanation as to why the gap was designated in the LP. ***Is this the extent of the evidence to support this particular gap?***
9. Even without the gap protection the land to the north of the A259 forms part of the setting to the South Downs National Park (SDNP) and Highdown Hill in particular and as such would be protected by other policies of the LP. Moreover, the gap has been compromised by development around Hangleton. ***In these respects the Council should review whether the Angmering/Worthing Gap is justified and, if it can be supported, whether the extent of it should be revised.***
10. The Felpham/Bognor Regis Gap does not appear to meet the objective of Policy SD SP3 to 'shape the patterns of towns and villages with the District' (paragraph 7.4.4). Felpham forms part of the Greater Bognor Regis Urban Area. Moreover, the gap is already narrow and would be further compromised by Site 4 of Enterprise Bognor Regis (EBR) and the Link Road. The gap policy may make it more difficult to deliver Site 4 and the Link Road. ***The Council should give further consideration as to whether the Felpham/Bognor Regis Gap is justified.***

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012

Matter 3b – Employment Allocations

Issue 2 – Enterprise Bognor Regis

11. The Council indicated that a written note would be produced on Bognor Regis Golf Course in the context of ongoing discussions and the content of Policy EMP DM2. ***Is this available?*** There appear to be issues around the delivery of the link road. ***In this context should the extent of the EBR Site 4 be modified? Is criterion 1. within Policy EMP DM2 (residential use not appropriate) too restrictive? Should the policy include other mechanisms which would support comprehensive planning and development of the area around the link road?***

Issue 4 - Angmering

12. The 8 ha allocation at Angmering would provide the largest site in the eastern part of the District, close to Worthing, and flexibility in the supply of employment land. However, the LP employment allocations through Policy EMP SP3 are significantly above the quantified need for the District as a whole. The Council's studies, which are endorsed by work carried out on behalf of developers at Angmering, questions the viability of the allocation. Moreover, evidence was put before the hearings that in order to deliver a minimum of 800 dwellings at Angmering North set out within Policy H SP2c, only a maximum of 3ha of employment land could be accommodated.
13. The LP should be aspirational but realistic. ***In this context and in order not to compromise the delivery of housing should the employment allocation at Angmering North in Policy EMP SP3 be modified to 3 ha? Alternatively should Policy H SP2c (SD9) include a provision similar to West of Bersted, BEW and Ford about the incorporation of planned new employment provision?*** In relation to the former option mechanisms could be included within Policy H SP2c to ensure that the lesser amount of employment land was made available alongside the housing, possibly as serviced plots. Such changes would require consequential modifications to Policies SD SP1a and EMP SP1. These comments are subject to the allocation being justified in relation to landscape impact as Site 14 identified in PESP5a is the employment land (see paragraph 23 below).

Matter 4a - The Housing Requirement

Issue 5 – The Components of Housing Supply

14. Table 12.1 is to be modified to reflect the position at 31 March 2017. One of the components of the table is Non-Strategic Sites. On the basis that non-strategic sites can be those with a capacity of up to 300 dwellings the figure of 1,250 dwellings seems very conservative even though deliverable HELAA sites within the built up areas are a separate figure. Increasing the supply from this source would increase flexibility through the LP period. ***The supply from non-strategic sites should be reviewed. At the very least the table should make it clear that the figure is a minimum.***

Issue 6 - Local Plan 5 Year Housing Land Supply

15. The updated figures in PELVP31 relating to the 5 year housing land supply² suggest 3565 dwellings would be delivered from strategic site allocations by 2021/22. The numbers are based on trajectories set out in updated Appendix A of the Housing Implementation Strategy (HIS). The LP is unlikely to be adopted until spring 2018 at the earliest. As I understand it only the Fontwell site and discrete phases of the West of Bersted and BEW allocations have planning permission. There are a number of outline planning applications under consideration by the Council (or SoS) but judging from the decision of the Council in relation to Climping the Council may be reluctant to grant permission on LP allocations before adoption. ***Is it realistic for the strategic allocations to deliver significant completions in 2018/19?***

Issue 7 – Housing Implementation Strategy and Policy H SP1

16. The HIS should show how the Council will maintain a delivery of a 5 year housing land supply during the LP period. One of the components of delivery is the 1,250 dwellings from Non-Strategic Sites to be brought forward through Neighbourhood Plans and a 'Small Sites DPD'. This is referenced in Policy H SP1. In this respect the reference to 'Small Sites' is a misnomer and not consistent with the title in Table 12.1. ***The term used in Policy H SP1 should be 'non-strategic allocations'.***
17. More importantly further consideration should be given to the timing of Neighbourhood Plans/Reviews and the 'Non-Strategic Allocations DPD' and how this is expressed in Policy H SP1. Taking into account the timing of delivery of the strategic allocations (see above), the maintenance of a 5 year housing land supply and the need for a range of sites, including those for smaller builders, there ought to be a commitment to begin work on a DPD soon after the adoption of this LP. Whilst I understand the resource constraints and the need to prioritise certain documents e.g. CIL Charging Schedule, it seems that much of the evidence base is already in place e.g. SHELAA. Based on what I was told at the hearings the Council already appears to know which parishes will be preparing Neighbourhood Plans or reviewing existing plans and the sort of housing numbers that they will need to achieve.
18. ***Taking into account the above, the final paragraph of Policy H SP1 could be expressed in terms such as this: 'Additional non-strategic allocations will be made across the District through emerging Neighbourhood Plans or reviews of made Neighbourhood Plans. On adoption of the Local Plan the Council will assess progress on Neighbourhood Plans and immediately commence the production of a Non-Strategic Allocations DPD for those areas of the District which will not be covered by up-to-date Neighbourhood Plans'. Consequential amendments will also be required to paragraphs 2.1, 12.1.7 and 12.1.8.***
19. Such an approach would also help to allay fears that strategic sites would share too much of the burden for infrastructure provision. Although the Council has concerns about maintaining delivery over the LP period and the timing of

² Revised Table 9 of Housing Implementation Strategy PELVP22

infrastructure provision, in reality it is unlikely that delivery would spike significantly above the trajectory. Moreover, phasing mechanisms could be included in such a DPD. In the longer term LP review would allow the requirement, allocations, infrastructure provision and delivery to be adjusted to take into account up to date evidence.

Matter 4c - Strategic Housing Allocations – Greater Bognor Regis (SD1-SD3)

Issue 2 – Constraints – Special Protection Area (SPA)

20. The allocation at Pagham South lies close to the Pagham Harbour SPA (just outside the 400m buffer). Technical Note PELP33a (September 2017) indicates that it would be prudent to undertake additional surveys for Brent Geese over the winter period between October and March. Correspondence from Natural England that I have seen preceded the Technical Note. At the hearings Natural England supported the conclusions of the Technical Note that further survey work should be carried out. ***Taking into account the latest position and evidence available are Natural England in a position to confirm in writing at this stage that the Pagham South allocation alone or in combination with other developments would not have significant effects on the European site?***

Matter 4e - Strategic Housing Allocations Inland Arun (other than BEW) (SD6-SD11)

Issue 1 - General

21. The figure of 'at least 400 dwellings' for the allocation at Yapton (SD7) appears to be inaccurate based on the site area and the background information which led to the allocation. ***On the assumption that the provision of a one form entry (1FE) primary school remains a requirement of the allocation then the policy should state 'at least 500 dwellings'.***
22. For Angmering North (SD9) the provision of at least 800 dwellings would appear to be dependent on the employment allocation being reduced to 3 ha. As mentioned in paragraph 13, a reduced employment component should be phased to be brought forward alongside housing. ***Policy H SP2c and the Policy Maps would need to be modified to have regard to the phasing, the reduction in employment land and the increase in the land take of the housing allocation.*** These comments are subject to the allocations being justified in relation to landscape impact (see paragraph 23 below).

Issue 2 – Constraints

23. Some of the sites at Angmering North (those bordering the South Downs National Park (SDNP)) are shown to have 'substantial' landscape sensitivity and 'low capacity' for development (Sites 12b, 12d and 14 in the Landscape Capacity Study PESP5a). The sites are particularly visible from the publicly accessible elevated ground at Highdown within the SDNP but I could not see any specific analysis of viewpoints/receptors from this direction in PESP5a. I note that the SDNP Authority do not object to the allocations subject to the inclusion of an additional criterion within Policy H SP2c on landscape appraisal. I also accept

that mitigation can be built into the developments in terms of landscape structure, retention of existing vegetation and buffer planting. ***However, further information to justify the soundness of the allocations in terms of landscape impact would assist me.***

Issue 3 - Infrastructure Requirements

24. In terms of the requirement for new primary schools at Yapton and other locations, the County Council's approach set out in the September 2017 update on school provision appears to be based on the assumption that the need for increased capacity is best dealt with by new schools linked to the allocations. During the hearings discussion took place about a number of related factors such as optimum school size, the scope to extend existing primary schools (to sustain them and reach an optimum size) and the preferences of the community. For example the indication was that Yapton would prefer to maintain a single primary school rather than have two. As a result of a planning application provision at Climping is to be through the expansion of the existing school rather than a new school.

25. ***Is the County Council able to provide more information on the factors outlined above - optimum school size, the scope to extend existing primary schools (to sustain them and reach an optimum size) and community preferences?*** This would enable me to consider such factors in assessing the soundness of particular allocations and the primary school components.

Matters 6 and 8b – Transport and Other District-Wide Infrastructure

Issue 2 – Transport Schemes

26. The Arun Transport Study 2016 Stage 3 Report (PECP9) refers to mitigation works in relation to certain junctions. The study has been updated by the Transport Review 2017 (PECP10). Paragraphs 5.2.1 and 5.2.2 of the latter refer to the junctions where mitigation may potentially be required due to severe capacity issues or safety risks. However, there is inconsistency between 5.2.1 which refers to 20 potential locations and 5.2.2 which refers to 5+7+3 junctions =15 junctions. The discrepancy appears to be that the 3 junctions with safety risks and the 2 junctions 'not identified in ATS 2016 Stage 3' are not referred to in paragraph 5.2.2.

27. In order to consider the LP in the context of paragraph 32 of the National Planning Policy Framework an explanation is required as to why the 2 junctions identified with the potential for severe impacts are not then taken forward to Stage 3. In this regard I note that the summary sheet v3 within PECP10 includes ratio of flow to capacity (RFC) (%) figures for various scenarios.

28. The B2266 Lower Bognor Road/Pagham Road Junction (No 53) has RFC (%) figures for 2031 without mitigation of up to 123 % but with the EBR mitigation a RFC (%) of up to 108%. The latter RFCs are lower than the '2031 Reference Case' highest RFC (%) of 112%. Similarly the RFC (%) for the B2259 Felpham Way/B2132 Middleton Road (No 44) is reduced from a worst case 104 RFC (%)

without mitigation to up to 92 RFC (%) with the EBR mitigation. The latter RFCs are lower than the '2031 Reference Case' highest RFC (%) of 95%. Thus it seems that the position in 2031 based on existing commitments but without mitigation of junctions set out in PECP10 would be worse than the 2031 with EBR mitigation. ***Is my understanding correct? Does this explain and provide sufficient justification for not taking forward the 2 junctions for mitigation?***

29. It does not appear that more detailed assessments connected with planning applications in Pagham have led to a need for mitigation to the B2266 Lower Bognor Road/Pagham Road Junction other than any benefits arising from more general sustainable transport measures (see hearing statements and Cumulative Transport Assessments attached to SOCG for Pagham – ADCED70, 84 & 85). ***Is this correct?***
30. With regard to the 3 junctions with safety impacts it is noted that these are not identified as having severe capacity impacts (paragraph 5.3.1 of PECP10). The A29 Lidsey to Shripney is not taken forward as safety concerns would be resolved by the A29 realignment. The 2 schemes at junctions on the A259 (20 & 21) are carried forward into Table 30 (Summary of Apportionment Results). However, the 2 junctions are not included in Table 31 (Estimated Mitigation Construction Costs) as designs have not been prepared as part of the transport studies. ***What is the explanation for excluding the 2 junctions with safety impacts? Should improvements be designed up so that they can be costed? Has more emphasis been put on capacity rather than safety and if so why?***
31. At the hearings the West Sussex County Council (WSCC) Transport representative made reference to a study to be begun in 2018 which would consider the A259 more comprehensively. It was stated by WSCC that more wide ranging improvements were not needed to the A259 to support planned growth in the LP. Moreover I note that such a scheme is not referred to in PECP10 or in the LP, including Policy T SP3. That said of the 15 schemes included within Table 30 of PECP10 seven are junctions on the A259. ***What is the timetable for a study of the A259? Should reference be included to it within Policy T SP3 or elsewhere in the LP with a view to work being eventually funded through CIL?***

Issue 6 – District wide infrastructure projects

32. I have some outstanding concerns on the issue of pooling limitations. The limitations could impact on the delivery of some key infrastructure such as the secondary school, new primary schools and indoor sports and leisure facilities. There could also be a disproportionate burden for those sites which could come along first, including some of the strategic allocations, which might be a disincentive to delivery. However, a solution which can be incorporated into policies within this LP is not obvious. ***I would suggest that the best approach would be to include within the LP a commitment to progress a CIL Charging Schedule immediately after the adoption of the LP (assuming that CIL is retained in some form at national level).***

33. Policy INF SP1 should be modified to reflect such a commitment. The wording should be along the following lines (4th bullet point of policy):

Where a contribution towards other district wide infrastructure improvements or provision is needed and viable this will be achieved through the Community Infrastructure Levy Charging Schedule and Regulation 123 Infrastructure List which will be introduced as soon as possible after the adoption of this Local Plan. Until such time as a Charging Schedule is adopted contributions will be achieved through planning obligations (where they meet the statutory tests).

34. The explanation to the policy could include an indication of the likely timescale for the adoption of a Charging Schedule. In this respect the timetable included at paragraph 31 of the Council's Matters 6 and 8b statement seems somewhat protracted. It should be condensed if possible on the basis that much preparatory work has already been undertaken in respect of infrastructure requirements and costings (PEDP4 & 5).

Future Timetable

35. As discussed at the final hearing session on 28 September 2017 the Council is preparing a composite Schedule of Proposed Main Modifications (MMs). This schedule is to include MMs which have arisen since the resumption of the examination of the LP³, including potential MMs discussed at the hearings. The Council said that the Schedule should be available by the end of October 2017. Based on this expectation the timetable for the remainder of the examination could pan out as follows (the timetable takes into account periods when I am not available to work on the Arun LP):

- By end of October 2017 – Schedule of MMs provided to Inspector.
- By 22 November 2017 – Inspector provides comments on Schedule and Council provide response to post hearing note.
- By end of November 2017 – Council finalise Schedule of MMs taking into account Inspector's comments and issues raised in this note.
- December 2017 - Sustainability Appraisal (SA) and Habitats Regulations Assessment updated as necessary to take into account Proposed MMs.
- January/February 2018 – publicity/consultation on MMs alongside updated SA/HRA for a 6 week period.
- Late February 2018 – Council consider representations on MMs and pass on to Inspector.
- March 2018 – Inspector finalises report. The report will be subject to QA and a LPA fact check as described in the Procedural Practice in the Examination of Local Plans (page 9) – see link below – which would probably take place in April 2018.
<https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>

³ All MMs arising post 'Arun LP 2011-2031 Publication Version showing Modifications'

Response

36. A response to this note should be provided as soon as possible. It would be particularly appreciated if any comments on the timetable could be provided quickly so that I can ensure that my future work and other commitments do not prevent expeditious progress on the remainder of the examination. It is appreciated that some of the other matters may require more time to respond, particularly those that require input from others e.g. WSCC and Natural England.
37. This note should be published on the website as soon as possible. The Council's response should also be published once prepared. However, it should be emphasised that no representations on the contents of this note and the Council's response should be submitted at this stage. Representations will be invited on MMs once these are published. This note and the Council's response will form background documents to the MMs.
38. If the Council require clarification of any of the above points please contact me via the Programme Officer.

Thank you.

Mark DaKeyne

INSPECTOR

11 October 2017

Appendix 3

Arun District Council's Main Modifications

ARUN LOCAL PLAN EXAMINATION - ADC Answers to Inspectors Questions following Interim Findings		! 5/95 う
INSPECTOR’S INTERIM FINDINGS FOLLOWING HEARING SESSIONS		° 0% 0% ↑ ↑ ↑ ↑ a a 、IX ↑ ↑ ↑ ↑ ↑ 9↑ 0 ↑ ↑
Introduction		
1. The purpose of this note is to provide preliminary findings on some key issues and my views on the further Main Modifications (MMs) that are likely to be required to make the Arun Local Plan (LP) sound following the hearing sessions. The MMs are in addition to those already raised in my preliminary and additional questions and those being considered by the Council as a result of the hearing sessions. In addition to possible MMs the note seeks clarification/further information from the Council on some matters following the hearings, particularly in relation to documentation that was submitted just before or during the hearings.	bIXro	bIXF
2. I would also advise that I will give full consideration to all the representations made about the LP including the oral contributions at the hearings. My final conclusions regarding soundness and procedural compliance will be set out in the report to be produced following consultation on the proposed MMs. Nevertheless, having regard to the criteria for soundness and to assist at this stage, I shall provide brief explanations for my findings thus far.	bIXro	bIXF
3. My findings may alter in the light of any further evidence that emerges including the consultation process. My views are therefore given here without prejudice to the conclusions that will appear in the report. My final report will also cover other main issues that arose during the examination but which are not dealt with in this note.	bIXro	bIXF
Matter 1 - Procedural and Overarching Matters		
Duty to Cooperate		
4. I have had regard to PELP27 - Duty to Cooperate (DtC) Statement Addendum April 2017 which details further engagement undertaken since the suspension of the examination, the Memoranda of Understanding submitted before and during the hearings and the other evidence provided by the Council e.g. the updated Local Strategic Statement (LSS2), the evidence gathering being undertaken for LSS3 and the production of the Arun Place Plan by West Sussex County Council. It would have been preferable for these strands of evidence to be set out in a composite document but this is not a significant consideration in whether or not the DtC has been met.	bIXro	bIXF
5. Other Councils are at different stages of plan preparation. Therefore, whilst the unmet development needs of Chichester are clear, the extent to which Worthing and Adur can meet their needs has not been decided. That said some unmet needs from those two Councils are likely to exist. In the context of the DtC the Council’s acceptance that it should meet some of the unmet needs from elsewhere within the sub-region demonstrates effective cooperation. Moreover, the LP is being examined at a point in time and the DtC evidence can only reflect that. Engagement will be ongoing.	bIXro	bIXF
	☙	
6. I am satisfied that the Council has engaged constructively and complied with the Duty to Cooperate.	bIXro	bIXF
	☙	
Consultation	☙	
7. There has been criticism of the Council’s approach to consultation, particularly in relation to engaging with local communities and residents on the significant modifications proposed following the suspension of the examination in February 2016. However, the Council has met the requirements in the regulations, relating to publication of the modified Plan over a 6 week period, seeking and considering representations and submitting documents to the Secretary of State (SoS). It is beyond the scope of the examination to require that the Council go back and do more.	bIXro	
	☙	

INSPECTOR'S INTERIM FINDINGS FOLLOWING HEARING SESSIONS	! 1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 20. 21. 22. 23. 24. 25. 26. 27. 28. 29. 30. 31. 32. 33. 34. 35. 36. 37. 38. 39. 40. 41. 42. 43. 44. 45. 46. 47. 48. 49. 50. 51. 52. 53. 54. 55. 56. 57. 58. 59. 60. 61. 62. 63. 64. 65. 66. 67. 68. 69. 70. 71. 72. 73. 74. 75. 76. 77. 78. 79. 80. 81. 82. 83. 84. 85. 86. 87. 88. 89. 90. 91. 92. 93. 94. 95. 96. 97. 98. 99. 100. 101. 102. 103. 104. 105. 106. 107. 108. 109. 110. 111. 112. 113. 114. 115. 116. 117. 118. 119. 120. 121. 122. 123. 124. 125. 126. 127. 128. 129. 130. 131. 132. 133. 134. 135. 136. 137. 138. 139. 140. 141. 142. 143. 144. 145. 146. 147. 148. 149. 150. 151. 152. 153. 154. 155. 156. 157. 158. 159. 160. 161. 162. 163. 164. 165. 166. 167. 168. 169. 170. 171. 172. 173. 174. 175. 176. 177. 178. 179. 180. 181. 182. 183. 184. 185. 186. 187. 188. 189. 190. 191. 192. 193. 194. 195. 196. 197. 198. 199. 200. 201. 202. 203. 204. 205. 206. 207. 208. 209. 210. 211. 212. 213. 214. 215. 216. 217. 218. 219. 220. 221. 222. 223. 224. 225. 226. 227. 228. 229. 230. 231. 232. 233. 234. 235. 236. 237. 238. 239. 240. 241. 242. 243. 244. 245. 246. 247. 248. 249. 250. 251. 252. 253. 254. 255. 256. 257. 258. 259. 260. 261. 262. 263. 264. 265. 266. 267. 268. 269. 270. 271. 272. 273. 274. 275. 276. 277. 278. 279. 280. 281. 282. 283. 284. 285. 286. 287. 288. 289. 290. 291. 292. 293. 294. 295. 296. 297. 298. 299. 300. 301. 302. 303. 304. 305. 306. 307. 308. 309. 310. 311. 312. 313. 314. 315. 316. 317. 318. 319. 320. 321. 322. 323. 324. 325. 326. 327. 328. 329. 330. 331. 332. 333. 334. 335. 336. 337. 338. 339. 340. 341. 342. 343. 344. 345. 346. 347. 348. 349. 350. 351. 352. 353. 354. 355. 356. 357. 358. 359. 360. 361. 362. 363. 364. 365. 366. 367. 368. 369. 370. 371. 372. 373. 374. 375. 376. 377. 378. 379. 380. 381. 382. 383. 384. 385. 386. 387. 388. 389. 390. 391. 392. 393. 394. 395. 396. 397. 398. 399. 400. 401. 402. 403. 404. 405. 406. 407. 408. 409. 410. 411. 412. 413. 414. 415. 416. 417. 418. 419. 420. 421. 422. 423. 424. 425. 426. 427. 428. 429. 430. 431. 432. 433. 434. 435. 436. 437. 438. 439. 440. 441. 442. 443. 444. 445. 446. 447. 448. 449. 450. 451. 452. 453. 454. 455. 456. 457. 458. 459. 460. 461. 462. 463. 464. 465. 466. 467. 468. 469. 470. 471. 472. 473. 474. 475. 476. 477. 478. 479. 480. 481. 482. 483. 484. 485. 486. 487. 488. 489. 490. 491. 492. 493. 494. 495. 496. 497. 498. 499. 500. 501. 502. 503. 504. 505. 506. 507. 508. 509. 510. 511. 512. 513. 514. 515. 516. 517. 518. 519. 520. 521. 522. 523. 524. 525. 526. 527. 528. 529. 530. 531. 532. 533. 534. 535. 536. 537. 538. 539. 540. 541. 542. 543. 544. 545. 546. 547. 548. 549. 550. 551. 552. 553. 554. 555. 556. 557. 558. 559. 560. 561. 562. 563. 564. 565. 566. 567. 568. 569. 570. 571. 572. 573. 574. 575. 576. 577. 578. 579. 580. 581. 582. 583. 584. 585. 586. 587. 588. 589. 590. 591. 592. 593. 594. 595. 596. 597. 598. 599. 600. 601. 602. 603. 604. 605. 606. 607. 608. 609. 610. 611. 612. 613. 614. 615. 616. 617. 618. 619. 620. 621. 622. 623. 624. 625. 626. 627. 628. 629. 630. 631. 632. 633. 634. 635. 636. 637. 638. 639. 640. 641. 642. 643. 644. 645. 646. 647. 648. 649. 650. 651. 652. 653. 654. 655. 656. 657. 658. 659. 660. 661. 662. 663. 664. 665. 666. 667. 668. 669. 670. 671. 672. 673. 674. 675. 676. 677. 678. 679. 680. 681. 682. 683. 684. 685. 686. 687. 688. 689. 690. 691. 692. 693. 694. 695. 696. 697. 698. 699. 700. 701. 702. 703. 704. 705. 706. 707. 708. 709. 710. 711. 712. 713. 714. 715. 716. 717. 718. 719. 720. 721. 722. 723. 724. 725. 726. 727. 728. 729. 730. 731. 732. 733. 734. 735. 736. 737. 738. 739. 740. 741. 742. 743. 744. 745. 746. 747. 748. 749. 750. 751. 752. 753. 754. 755. 756. 757. 758. 759. 760. 761. 762. 763. 764. 765. 766. 767. 768. 769. 770. 771. 772. 773. 774. 775. 776. 777. 778. 779. 780. 781. 782. 783. 784. 785. 786. 787. 788. 789. 790. 791. 792. 793. 794. 795. 796. 797. 798. 799. 800. 801. 802. 803. 804. 805. 806. 807. 808. 809. 810. 811. 812. 813. 814. 815. 816. 817. 818. 819. 820. 821. 822. 823. 824. 825. 826. 827. 828. 829. 830. 831. 832. 833. 834. 83
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Appendix 4

Examination Document SEDP7

PRIMARY EDUCATION REQUIREMENTS

Strategic allocation and quantum of housing allocated in the LP			Child product from site allocation (Number of pupils per year of age)	Catchment schools	Shortfall of school places as a result of the site allocation	Scope for school expansion	Site specific requirements to mitigate the impact of proposed development
SD1	Pagham South	400	14.4	Rose Green Infants 3FE & Rose Green Juniors 3FE	43.2 per year of age or 1.5 forms of entry (FE)	The current infant and junior provision are both oversubscribed with in area children. Both schools are at the preferred maximum size for primary education * PSP2017 (P4)	Land and build costs for 1FE expandable to 2FE site at any one of the strategic sites to serve the proposed developments in Pagham SD1 and SD2.
SD2	Pagham North	800	28.8				
SD3	West of Bersted	2,500	90	Southway Primary 3FE	90 per year of age or 3FE	Current provision already at the preferred maximum size for primary education. * PSP2017 (P4)	Land and build costs for 3FE primary school to serve the proposed development
SD4	West Bank	1,000	36	River Beach Primary 3FE & White Meadows Primary 3FE	36 per year of age or 1FE+	Current provision already oversubscribed and at the preferred maximum size for primary education * PSP2017 (P4)	Land and build costs for 1.5FE expandable to 2FE primary school to serve the development

SD5	BEW	2,300	83	Aldingbourne 1FE Barnham 1.5FE Eastergate 1FE Walberton & Binsted 1FE	83 per year of age or 3FE	In addition to the proposed 1/2FE expansion required from SD6 the provision is predicted to exceed capacity without further development in the area. All schools will be at capacity for their current site size as per the guidelines in the Department for Education **Building Bulletin 103	Land for 2 x 2FE primary schools and build costs for 2FE and 1FE expandable to 2fe primary schools to serve the development. A further 700 dwellings are proposed outside the plan period which will require the second FE to be built
SD6	Fontwell	400	14.4	Aldingbourne 1FE Barnham 1.5FE Eastergate 1FE Walberton & Binsted 1FE	14.4 per year of age or 0.5FE	Expansion by 1/2FE in the planning area.	Financial contributions towards expansion of existing provision in the planning area
SD7	Yapton	400	14.4	St Marys Clymping 0.5FE & Yapton 1.5FE	Cumulative 68.4 per year of age or 2FE+	St Marys Clymping could not expand beyond the proposed expansion in relation to the 300 dwellings proposed to be allocated in SD10 and Yapton only	Land and build costs for 1FE primary school
SD8	Ford	1,500	54				Land and build costs for 2FE primary school

						has capacity to expand by 0.5FE as per the guidelines in the Department for Education **Building Bulletin 103	
SD9	Angmering North	800	28.8	St Margarets CofE Primary 2FE (70 places per year of age) St Wilfrids catholic Primary 1FE	Cumulative 37.8 per year of age or 1FE+	St Margarets CofE Primary. Christian faith school with no designated catchment area. May have site availability for expansion but without undertaking feasibility studies cannot confirm. Would also involve consultation with the diocese. St Wilfrids Catholic Primary, faith school with no designated catchment area could not expand further on its existing site as per the guidelines in the Department for Education **Building Bulletin 103	Land and build costs for 1FE expandable to 2FE on either strategic site SD9 or SD11. Arun DC preference for school in the South and have already secured some funding for this provision.
SD11	Angmering South & East	250	9				

SD10	Clymping	300	10.8	St Marys Clymping 0.5FE	10.8 per year of age	Expansion by 1/2FE has been referred to in our S106 consultation response for outline planning CM/1/17.	Financial contributions towards expansion of existing provision in the planning area
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Any reference to planning area relates to West Sussex County Council's 24 school planning areas as set out by the Department for Education.

We aim to create a minimum 5% buffer for available school places as per the National Audit Office report on Capital Funding for new school places published in 2013."

Calculations explained https://www.westsussex.gov.uk/media/8812/s106_explaining_contribution_calculations.pdf

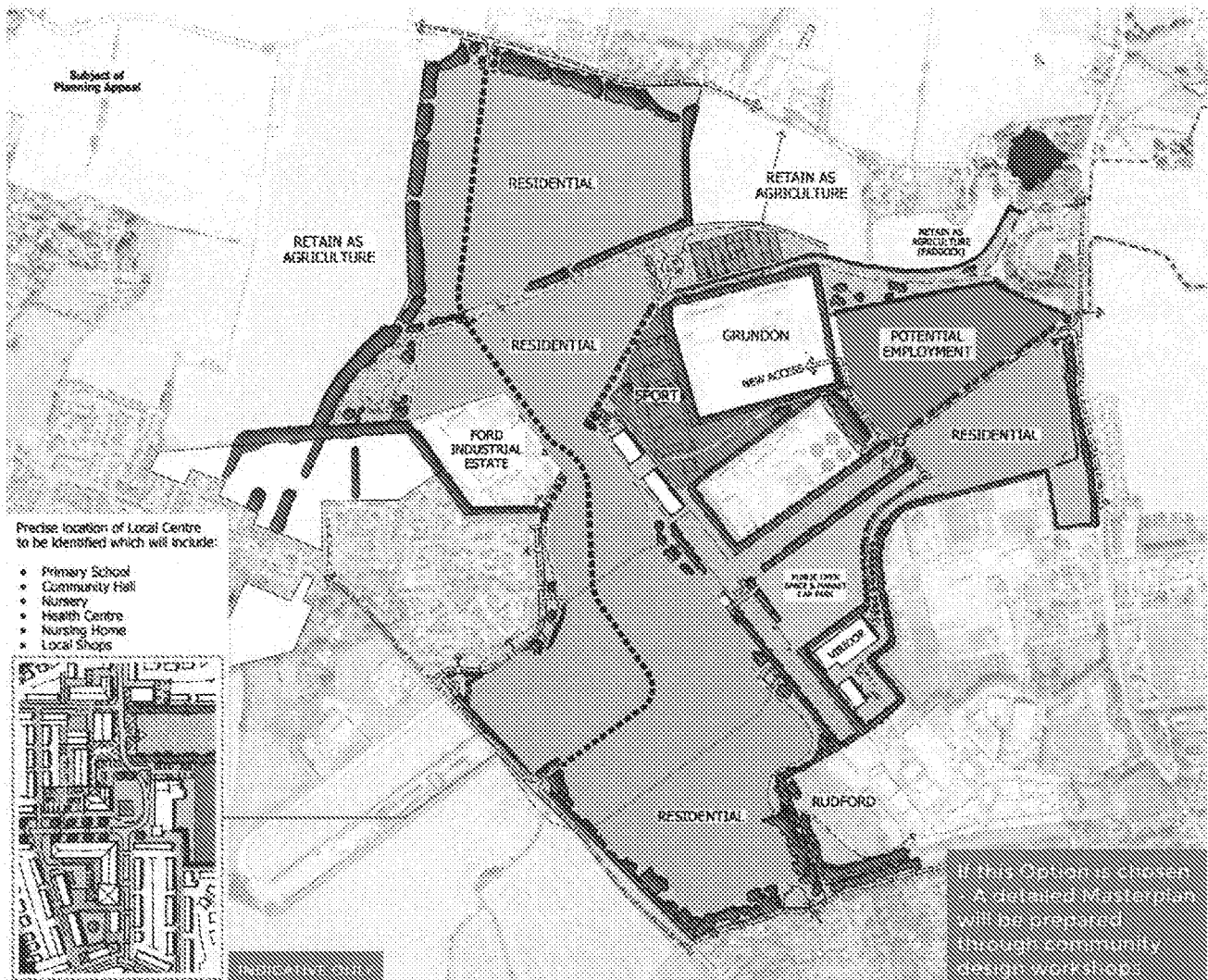
* [Planning School Places](#)

** [88103](#)

Ford Indicative Masterplan

OPTION 2

INCREASE THE SIZE OF DEVELOPMENT THROUGH THE NEIGHBOURHOOD PLAN



Advantages	Disadvantages
1500 homes rather than 750 homes provides greater opportunities to secure community benefits	Additional housing will be proposed over the 750 homes agreed in February 2015 by the community
Neighbourhood Plan firmly controls the growth of the community	Additional impact that may need to be addressed for example - Increased highways traffic
Masterplan led - a well-planned and integrated development for north and south Ford	
More affordable housing and key worker housing to help meet local needs	
Provides more certainty that the Neighbourhood Plan will not be overridden by the LP on adoption (much like many other areas with Neighbourhood Plan's)	
Ensures the long term success of the community facilities	
Improved community facilities	
Improved open space	

YOUR IDEAS | YOUR COMMUNITY | YOUR PLAN

**WSCC Planning for School Places, 2017
(Arun Extracts)**

Planning School Places 2017





FOREWORD

In this booklet we explain the principles behind the school place planning process in West Sussex, and how we plan to meet the growing need for additional school places throughout the County. We have included details that have been provided across each of the Districts and Boroughs in West Sussex. Our proposals have been outlined, either by individual schools or planning areas, both in the short term as well as for the current fifteen year span of the District and Borough Local Plans.

Forecasting pupil numbers is based on a number of factors, such as birth data, migration trends and on the anticipated future housing numbers. However, this is by no means an exact science and we are continually reviewing our methodology, as sources of alternative data become available.

We need to ensure the highest possible level of accuracy in projecting school numbers, so a review of our approach to school place planning was undertaken in 2014 by the Pupil Projection team, in conjunction with the Department for Education.

West Sussex has identified that growth in pupil numbers will be a factor for several years to come and, as each District and Borough finalises its Local Plan, those pupil numbers will be adjusted to reflect future housing numbers.

In 2016 we sought your comments on our new look Planning School Places booklet. Those responses confirmed that overall you found the format and content of the booklet helpful. We have now analysed those comments and, where applicable, we have incorporated them in the current version, which we trust you will find even more helpful.

We would encourage you to read this booklet and again we would very much appreciate your feedback. Your suggestions, together with your local knowledge, are all very important to us. Your views will help to ensure that our future planning for school places will reflect the ever-changing landscape across West Sussex. There is a link to a short online survey on the back page of the booklet and we would encourage you to complete this form.

*Jeremey Hunt
Cabinet Member for Finance
West Sussex County Council*

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1. INTRODUCTION

The purpose of this document is to:

- set out the policies and principles of West Sussex County Council (WSCC) to ensure that there is a sufficient supply of suitable school places to meet statutory requirements for early years, primary, secondary and sixth form provision (including up to age 25 for those with special educational needs and/or disabilities as outlined in the SEND Code of Practice 0-25 2014);
- provide information on the current organisation of school places, any proposal to review current organisation and the existing capacities and number of pupils attending those schools;
- provide forecasts of future pupil numbers, and how any changes in demand might be addressed;
- identify opportunities that may exist for further expansion where required to meet the demands from new housing and/or population increases; and help schools, promoters, parents, developers and local communities to understand the demand for school places and to provide a context for their own planning.

It is the role of WSCC to plan, organise and commission places for all maintained schools in the County, in a way that raises standards, manages rising as well as declining pupil numbers and creates a diverse community of schools. WSCC seeks to exercise this function in partnership with dioceses, academy sponsors, multi-academy trusts, governing bodies of schools, headteachers, local communities and other key stakeholders.

The need for school places changes in response to population movements and birth rate variations. Increases in demand can lead to the creation of a new school or the expansion of existing schools by adding permanent or temporary accommodation.

Surplus places can also mean the reduction of school provision in an area through reduced admission arrangements or the rationalisation of school provision, including changes to existing catchment areas. Any review of school provision undertaken by the County Council (e.g. the opening, closing, federating, amalgamating, expanding or contracting of schools) will, in the large part, be led by forecast pupil numbers.

Predicting school place demand is a complex task. Where children go to school involves a range of factors such as housing growth, inward and outward migration and parental preference. As a result, planning for school places is based on probabilities and not certainties and while pupil forecasts may be derived from sound methodology, they come without guarantees. Furthermore, the practice of school organisation must take into account a number of different, and at times conflicting, factors. This includes the need to:

- respond to local need, to raise standards, to promote diversity, to respond to government policy;
- to respond to external and internal findings on the quality of schools; and
- ensure that scarce resources are used efficiently.

A number of schools have been expanded in recent years in response to rising demand for places. The established practice is to support sustainable expansion. Decisions on expansion take account of factors including the availability of resources for new buildings, the infrastructure of the school (halls, specialist facilities and services such as gas and electricity supply capacity), the size of the site and transport implications. The quality of education and its sustainability are key considerations. Other important strategic factors are the availability of places locally, set in the context of the likely pattern of future demand, modified where appropriate through plans for known housing developments and migration.

Not all unfilled places in a school are surplus places; some margin of capacity is necessary to allow parents to exercise a preference, given that there will be volatility in preferences from one year to the next, and to allow for differences in the size of individual cohorts. The County Council's position is that a school should be considered as full when it has less than 5% of its places unfilled. This is also a figure recognised by the Department for Education.

The range of educational provision for children and young people is now both broad and complex in terms of the number of providers involved, and also their roles. Therefore, to aid understanding it may be helpful to consider provision in three phases:

- Age 0-4 'early years' in which private voluntary and independent playgroups and nurseries are the main providers;
- Age 4-16 'compulsory school age' in which schools are the main providers;
- Age 16-19 'further education' in which colleges and school sixth forms both offer substantial provision. N.B. this extends to age 25 for young people with special educational needs and/or disabilities.

This document will therefore form part of the family of plans and policies that relate to West Sussex. It will also facilitate the development of other plans and strategies for the delivery of schools and school places, and the replacement and/or refurbishment of existing provision where necessary. It will link to the forward planning of education provision in response to likely and known future house building.

We would welcome your feedback on this document via the following link to a short survey –

[Planning School Places 2017 Feedback](https://haveyoursay.westsussex.gov.uk/strategic-planning-and-place/planning-school-places-2017)

<https://haveyoursay.westsussex.gov.uk/strategic-planning-and-place/planning-school-places-2017>

Please be aware we will not be responding directly to any comments made in the feedback survey. Although for internal use only, it will be used where practically possible, to develop future editions of this document.

2. POLICY AND PRINCIPLES

School Capacity

School capacity is measured using the Department for Education (DfE) Schedule of Accommodation Tool for schools and for secondary provision. This includes a curriculum analysis tool that we use to ensure that a school's accommodation is used to its maximum potential within the Asset Management Plan (AMP). To calculate a school's Net Capacity all of the accommodation is measured and categorised according to its use e.g. general teaching, practical, large space etc. Depending on the size of each room, a number of workplaces and resource places are generated; these are totalled for the whole school. If there are not enough resource places, the number of workplaces is reduced to ensure that there is enough storage and other supporting infrastructure in the school. Factors are then applied to take into account the age range of the school. This generates a range within which the Net Capacity can be set. The Net Capacity reflects the Published Admission Number (PAN) of the school and the organisation of age groups as well as the building information.

Although there is an agreed Net Capacity for every school, which is then reflected in the Admission Number, when the floor space of the school is measured, the mathematical model expresses the capacity as a range. This allows some tolerance in setting the Published Admission Number (PAN) to reflect how classes would be managed within the school - for example if the range of a 4-11 primary school was 200-220 places, the Net Capacity might be set at 210, which enables a PAN of 30 pupils per year. Hence there could be seven classes of 30 pupils, which exactly match the 'standard' size classroom model of 30 pupils. Setting the Net Capacity nearer to 220 could lead to a PAN of 31, which would exceed the statutory requirement for Infant classes to be no more than 30 pupils.

Schools in West Sussex are considered to be at capacity when the number of pupils in relation to the capacity is equal to or exceeds 95%, which is in line with the National Audit Office report on Capital Funding for new school places published in 2013, where it states:

"It considered that on average 5 per cent was the bare minimum needed for authorities to meet their statutory duty with operational flexibility, while enabling parents to have some choice of schools".

The full report can be found by following the link on page 14 under further information.

Site Areas and Playing Fields

There is recent guidance from the DfE (in the form of Building Bulletins and Premises Regulations) about the sizes of school sites for new schools, to enable them to meet all the requirements not only of the education curriculum but also to play their part as 'hubs' for the local community. Consequently, many school sites now accommodate a range of related facilities, such as Children's Centres, nurseries, playgroups, adult education etc. some of which may be in their own buildings. In addition, there are statutory requirements to be met in terms of ensuring some schools (those with pupils over eight years of age) have a grassed area that "can sustain the playing of team games thereon by pupils at the school for seven hours a week during school terms".

Every school site in West Sussex has been assessed in terms of how well its site meets these requirements and whether there appears to be any scope for additional provision where it does not.

Size of School

The County Council's policies on the size of a school are aimed at meeting the needs of pupils and the local community, in an educationally effective way.

- Settings need to be cost effective and to provide the breadth of curriculum and teaching expertise to meet the standards set out in the education policy;
- settings also need to be organised on a 'human scale' if they are to support 'friendly working relationships between adults and children';
- a local educational presence is an important contributor to the sustainability of rural communities; and
- we should ensure that sufficient places are available in schools to support parental preference whilst avoiding an excess of surplus capacity.

Our guiding principles for primary schools are that, wherever possible:

- all-through primary schools (ages 4-11 years) should be established;
- they should have a minimum of one form of entry (FE), 210 places and ideally a maximum of 3FE, 630 places, although recent guidance from the Department for Education suggests new primary schools should ideally be no smaller than 2FE, 420 places; and
- the pattern of schools should ensure that a primary school is readily accessible to its pupils and, in urban areas, within walking distance of the homes of the majority of its children, as detailed later under the transport paragraph on page 7.

Secondary schools in West Sussex are on average larger than in many other areas of the country. In order to achieve the benefits of smaller scale schools we will:

- support the development of 'schools within schools' on existing sites; and
- consult on, and agree research-based criteria and guidelines for planning 'schools within schools'.

We will also encourage secondary schools in rural areas to make more use of their links with primary schools to extend their presence in local communities, and their accessibility to parents/carers.

In the case of secondary schools, the County Council would normally wish to see schools operate at a minimum of six forms of entry (FE), although the County Council recognises that 4FE and 5FE secondary schools are currently well established and operating in West Sussex. In planning terms, a form of entry (FE) is 30 pupils, therefore, a 6FE 11-16 secondary school would have year groups of 180 and a total of 900 pupils on roll. The County Council supports a range of sixth forms, which reflect individual schools, and the areas they serve.

There are no final guidelines for the size of special schools. The size of special schools relates to the age range and the type of special educational need. Where pupils present significant management difficulties special schools tend to be smaller.

Class Sizes

West Sussex County Council has invested heavily, both in buildings and revenue funding, to ensure only in exceptional and unavoidable circumstances that infant classes will contain more than 30 pupils. All primary schools are resourced to allow average class sizes to be below 30. However, the County Council believes that the organisation of classes within schools should be determined by headteachers and governors, who will wish to take into account all factors appropriate to their own school in establishing their staffing and organisation within legislative constraints. In secondary schools the County Council resources secondary-age pupils in line with the average for English 'Shire' authorities and again recognises that the organisation of individual schools is a matter for headteachers and governors to determine locally.

Age of Transfer

In order to reduce disruption to children's learning during their years of compulsory education, we aim to minimise the number of times that children have to transfer from one setting to another by aligning these transfers to the Key Stages of the national curriculum. For most children this means transferring from all-through primary schools to secondary schools at the age of 11. The remaining planning area (Steyning/Storrington) that did not reflect the Key Stages of the national curriculum was consulted on in 2016 and the changes will be implemented with effect from September 2017.

Finance

Funding for the provision of additional school places or removal of surplus places in community and voluntary controlled schools is included in the County Council's Capital Programme. The Capital Programme is determined annually through a decision made at County Council, which gives the highest priority to meeting basic need through Primary and Special School Basic Need and Secondary Schools Basic Need allocations.

The Capital Programme also makes provision for school capital maintenance projects. The prioritisation of spending is governed by the Asset Management Plan and benefits from a review by headteacher representatives and officers, prior to confirmation by the Cabinet Member for Education & Skills.

Capital work in Voluntary Aided Schools is, in approved cases, funded directly by the Department for Education to the value of 90% of the majority of costs. The remaining 10% will be met by the school.

Under the Government's or Voluntary Aided schools' legislation, new schools must be opened as free schools or academies and, only if no free school sponsor can be found, opened as Local Authority maintained schools. In this instance, funding is made available from the DfE.

Whilst central government separately funds new free schools and academies, it also provides some funding to Local Authorities to cater for population growth, from the Education Funding Agency (EFA).

This funding is an un-ring-fenced capital grant and is available to contribute to meet the demand for additional school places. There is also an expectation that funding will be obtained in the form of Section 106 Developer Contributions and through the Community Infrastructure Levy (CIL). These contributions will form a major element of the financing of the County Council's basic need programme for the provision of new school places. In some circumstances, this will include the provision of new school sites and the developer building schools on behalf of the Local Authority, which would then open as academies.

Views of Interested Parties

Before bringing forward proposals to add, remove, relocate or otherwise reorganise school places, the County Council will first undertake an option appraisal to ensure the scheme is feasible. After consideration of the views of interested parties, as part of a public consultation, a preferred option will be proposed and if necessary statutory notices will be published.

Admissions Policy

Parents in West Sussex are invited to indicate up to three preferences when applying for a school place for their child. The pattern of mobility across many parts of the County is evidence that parental preference is met in a very high proportion of cases, for example, some popular and successful rural primary schools attract a substantial number of their pupils from outside the school's immediate area. Overall, approximately 95% of preferences for schools are met.

Full details of the County Council's admission policies are published on the West Sussex website.

www.westsussex.gov.uk

The governing bodies of voluntary aided church schools, academies and free schools set the admissions criteria for their individual school. In the case of academies, the EFA requires that any changes to the admission policy, including increases in the number of sixth formers and the minimum number of external places to be offered, must be in consultation with the County Council and other providers.

The Greenwich Judgement affects schools close to the County boundary. In practice, the Law requires the Local Authority to admit pupils no less favourably and according to its admission criteria irrespective of the Local Authority in which they live.

This means that a significant number of pupils from Surrey, Portsmouth, Brighton and Hove, Kent, Hampshire and East Sussex attend West Sussex schools close to the County boundary and vice versa.

Other than for single sex schools, admissions policies are blind to matters of gender, race or disability in line with the National Admissions Code. Policies do however ensure that where it is essential for a child to attend a particular school, to meet his or her medical, social, and psychological or education needs, they receive priority.

Summer Born Children

WSCC (in agreement with the majority of the South East Regional Network Group) are taking the line that until the consultation has been completed and the code changed they will continue to act in accordance with the current code. Parents are expected to apply to the relevant admission authority if they wish their child to be considered for delayed entry into reception. Each case will be considered on its own merit and parents must demonstrate why it is in the child's best interest to start in reception a year later, rather than going straight into Year 1. The views of headteachers (and the educational psychologist where relevant) will be taken into account when making any decisions.

Single Sex Schools

All primary schools and the majority of secondary schools are co-educational, other than in Horsham and Worthing where there are pairs of single sex secondary schools. The Chichester High School for Boys and Chichester High School for Girls, from September 2016, became co-educational for the Year 7 intake.

Age Ranges

In West Sussex, schools historically provided for many different age ranges. Children were able to change school at seven, ten, eleven, or thirteen years of age depending on where they lived. In their report in June 2001 the Office for Standards in Education (Ofsted) recommended that the County Council "review the different ages of admission and school transfer and make plans in the long term to develop a consistent system".

The County Council's view is that where schools would not be too large and appropriate facilities can be provided, the preferred arrangements would be 'all through' primary schools, covering Key Stages 1 and 2 with Key Stages 3 and 4 taught in secondary schools.

Given this recommendation and other factors, such as teacher recruitment and national research into children's achievements providing evidence that children do better with a minimum number of changes of schools, the County Council consulted in Crawley, Rother Valley, Lancing, Shoreham, Steyning / Storrington and Durrington/Worthing localities on changing the age of transfer.

Decisions made as a result of all of these consultations, with the exception of Steyning /Storrington, have been implemented.

Consultation in Steyning/Storrington, the last remaining area of the County where the pattern of schooling does not follow the Key Stages of the National Curriculum, has been completed and changes to the schools in the locality will take effect from September 2017.

Transport

Transport to school is provided in accordance with the Authority's statutory duty. Pupils under the age of eight receive transport if they live more than two miles away from their catchment school, and pupils over the age of eight receive transport if they live more than three miles away from their catchment school. Distance is measured by the shortest available walking route.

The County Council is promoting a number of initiatives, including the use of public transport rather than private vehicles through School Travel Plans led by the Safer Routes to School Team.

West Sussex Early Childhood Service

The County Council has a statutory duty to ensure that there is access to a free high quality early education place for all three and four year olds whose parents would like to take up a place for their child. The duty also includes the same entitlement for the most disadvantaged 40% of two year olds relating to family income criteria and/or children with specific characteristics, including: children looked after, adopted or with special guardianship orders and/or children with special educational needs/disabilities, from the first term after their second birthday.

Every eligible child is entitled to 570 hours of free early years education over no fewer than 38 weeks of the year (up to and including 15 hours per week). Parents may be able to take up patterns of hours which 'stretch' their child's entitlement by taking fewer free hours a week, but over more weeks of the year, where there is provider capacity and sufficient demand from parents.

For three and four year olds, in eligible working families, from September 2017 this free entitlement is extended to 1140 hours a year (30 hours per week). The additional 15 hours will be available to families where both parents are working (or the sole parent is working in a lone parent family), and each parent earns, on average, a weekly minimum equivalent to 16 hours at national minimum wage or national living wage, and less than £100,000 per year. Working will include employed and self-employed persons.

Pre-school settings may charge parents for additional sessions. No assistance is available with transport costs. Full details of provision for pre-school children can be found on the West Sussex County Council's website:

<http://www.westsussex.gov.uk/freechildcare>

or by phoning the Family Information Service on 01243 777807.

Raising the age of participation

Following the change in Government legislation in April 2013 the age to which all young people in England are required to continue in education and training has increased to at least their 18th birthday.

This does not mean young people must stay in school. They will be able to choose from:

- full-time education (e.g. at a school or college);
- an apprenticeship or traineeship;
- part-time education or training, combined with one of the following:
 - employment or self-employment for 20 hours or more a week;
 - volunteering for 20 hours or more a week.

Provision for Post 16 students other than at University or in Higher Education

The County Council has a statutory duty to secure sufficient suitable education and training opportunities to meet the reasonable needs of young people in the County. Young people are defined as those who are over compulsory school age but are under 19, or aged 19-25 for those children with Special Educational Needs or Disabilities. The County Council does not have a duty to cater for higher education (HE) students at universities. The responsibility for HE planning sits with the Higher Education Funding Council for England (HEFCE).

Ensuring the supply of places meets demand can be managed in a number of ways including:

- building new facilities;
- supporting providers to extend and/or relocate if necessary to allow for expansion;
- supporting providers to work in partnerships within areas to collaborate to meet future demands through effective transition planning.

In making decisions the County Council mainly works with schools, but also with providers offering different types of provision, including:

- Schools with Sixth Forms;
- Special Schools with post 16 provision;
- General Further Education Colleges;
- Sixth Form Colleges;
- Private Training Providers including Apprenticeship Providers; and
- Out of County Independent Specialist Providers.

The County Council works closely with the EFA and the Skills Funding Agency (SFA). The physical capacity of colleges is measured using the SFA's floor space utilisation methodology within the 'Supplement A to Circular 02/20 – Guidance of College Property Strategies' and used partly as a basis for funding.

Private training providers develop their own property strategies and make investments in their buildings and facilities. Currently, there are no public capital funds for private training providers who deliver post 16 provision in West Sussex.

Learner Numbers and Summary of Travel to Learn Patterns

Future 16-18 learner numbers are based on historical trends of progression to post 16 provision from the Year 11 cohort, historical travel to learn patterns and progression from Year 12 to Year 13. It should also be noted that young people can, and do, join courses at any time between the ages of 16 and 18 and, in the case of some flexible college and private training provider's, at any time of the year. 16-18 learner numbers can be unpredictable as they are subject to changes in the economic climate, e.g. reduced employment and training opportunities, Government policies such as Raising the Participation Age (RPA) and young people being placed in the county by social care services in other Local Authorities. RPA now places a duty on all 16-18 year olds to remain in full-time education, an apprenticeship or job with training or volunteering with training until they are 18.

RPA expects Local Authorities to encourage and enable young people to participate in education or training and to support the re-engagement of those who are not participating. However, placing a duty on 16-18 year olds doesn't necessarily mean they will all engage.

Special Educational Needs and Disabilities (SEND) Strategy

A Special Educational Needs and Disabilities (SEND) Strategy has been co-produced with education, health, early years, voluntary sector and parent representatives. The Strategy aims to provide high quality local education provision for children and young people with SEND in West Sussex and optimise value for money from the High Needs Block of the Dedicated Schools Grant.

The objectives of the Strategy are:

- to ensure that children and young people with SEND are, where possible, welcomed and included within their local mainstream education setting;
- to ensure that local mainstream and special provision is effective, of a high quality and delivers good educational outcomes for children and young people with SEND.
- to build a model of educational provision and support in West Sussex which enables young people with SEND, wherever possible, to live and go to school/college locally; and
- to deliver an offer that is sustainable and cost effective now and into the future and takes due account of predicted demand.

The Authority provides a range of provision for children and young people with SEND including in mainstream schools, special support centres based in mainstream schools, special schools and services for pre-school children with special educational needs or disabilities. The aim for each child is to meet his or her individual needs in the most inclusive learning environment.

In response to parental views, the Authority will make arrangements for each child who has a Statement or an Education, Health and Care Plan to ensure that:

- the school can meet the child's particular special needs; and
- this is compatible with the efficient education of other children and the efficient use of resources.

Alternative Provision

Pupils can be out of school for a variety of reasons: health, following permanent exclusion from school or having been directed to off-site education to improve his or her behaviour. There is a range of provision for such children and young people under the Authority's 'case management' arrangements. These can include individual tuition, group tuition, on-line learning, vocational training at a college of further education, planned physical activities and/or placement in a pupil referral unit.

There are 292 full time equivalent places at the West Sussex Alternative Provision College, mainly for pupils who have experienced significant behavioural difficulties.

A further 92 full time places are commissioned with the Further Education Colleges for Key Stage 4 pupils who would benefit from a vocational pathway.

Schools Access Initiative

The County Council has a strategy to develop a pattern of secondary schools that have the additional facilities to support the needs of pupils with disabilities across West Sussex. Primary schools have also been identified within each of these secondary schools' catchment areas, to provide similar facilities enabling continuity of education within a locality. Other schools will be helped wherever possible to provide for the needs of pupils with disabilities living in their area, in accordance with their duties under the Disability Discrimination Act. In support of this inclusive approach, the County Council seeks to use its Capital Programme to improve the accessibility of its schools for children, parents, staff and visitors.

Further information can be found by following the link on page 14.

Planning School Places and Locality Working

In order to carry out effective pupil place planning West Sussex, in line with the Department for Education's requirements for pupil forecasting and school capacity, is split into planning areas, or sometimes referred to as locality groups of schools. These are based on the geographical areas defined by the secondary school's catchment area and the feeder schools aligned to them. There are currently 24 planning areas in West Sussex. Any decisions on changes to education provision, such as the expansion of one or more of these schools, are discussed on a regular basis with the headteachers and, where necessary, the relevant diocesan representatives within these planning areas. Further detailed information on any proposed changes, or additional provision within these planning areas, can be found in the District and Borough commentaries section of this document.

Projected School Population

Pupil numbers are rising and are likely to continue to do so. This will be significantly affected by population demography, together with the proposed timing, size, tenure and location of future housing developments. Whilst the increases are not consistent across the County, some planning areas have experienced a 1% or more year on year increase in pupil numbers. The growth of pupil numbers in the primary sector in the last seven years, is now beginning to affect the number of children seeking a place in secondary schools across the county.

Short term and long-range forecasting methodology

Forecasting pupil numbers is reliant on accurate birth data. Birth data is collected by the Office for National Statistics (ONS) by electoral ward. Data on pupil movement trends is collected from the School Census and examines pupil movement between schools, localities, in and out of the county, and between educational stages i.e. transferring from primary, including infant/junior, to secondary school. These trends are combined with birth and housing data in order to create pupil projections or forecasts. These pupil projections allow the County Council to commission adequate educational provision to ensure that every child who requires a school place is offered one.

Although school place demand is based on planning areas, or localities, there is no direct link between the number of children living in a particular area and the number of school places available there. This is because, when it comes to applying for a school place, parents/carers are under no obligation to apply for their nearest school and could instead express a preference for a school outside of their town, borough/district or county, or choose home schooling or independent provision for their child.

The County Council has recently acquired new statistical analysis software that will be used to further enhance the current projections model. This software is used by a number of other Local Authorities and supports the annual forecasting returns which have to be provided to the Department for Education.

Where possible, the County Council strives to meet parental preferences. Analysing historic pupil movement trends enables the planning of school places to take preference patterns in an area into consideration. West Sussex County Council's pupil planning is effective in this regard and for September 2016, the County Council was able to offer a place at a preferred school to 97% of reception applicants, 98.5 % of junior applicants and 97.6% of secondary applicants. Pupil movement trends also allow the County Council to understand whether there is a significant movement of pupils in a particular area.

New Schools

The County Council considers that new primary education provision should be located within housing developments that are large enough to support their own provision. School provision should be within reasonable walking distance of the homes of all pupils served by the new provision, with safe (preferably segregated) routes for journeys on foot or bicycle and related to public transport. Wherever possible, new school provision should be located in proximity to other community facilities, as part of a focus for new development.

Similar principles apply to the location of new secondary provision, where a more peripheral site may be acceptable so that the school's playing field forms a buffer between urban and countryside areas. In sympathy with the principles of "sustainable development", the impact of new housing development should be addressed by the development itself. This means that where additional school places are required as a consequence of development, the cost should fall on the landowners and/or developers, by way of financial contributions.

Any new school sites required should be provided, fully serviced and free of charge, by developers. A financial contribution should also be made to meet the cost of the additional school accommodation. Such contributions are sought through the local planning authority's development control process. The County Council expects contributions to be made from all developments which will create a shortfall in capacity (at primary and/or secondary schools), or where capital investment would enable a school to admit additional pupils within its existing buildings.

Other large developments, and the cumulative impact of several small developments in some areas, may require additional places at existing primary schools.

It will also be necessary to address the need for secondary school places associated with major developments in the county, which may involve new schools or expansions to existing schools.

Further information can be found by following the link on page 14.

When seeking contributions in relation to new housing developments that give rise to an increase in the population above the available 95% capacity of schools in the relevant planning area, contributions towards the cost of providing the necessary additional buildings will be sought.

Developer contributions will be applied to all age groups within the Local Authority services where no existing accommodation is available.

Academies and Free Schools

An academy is a public funded independent school (not maintained by a LA), accountable to the Department for Education (DfE) and funded directly by the Education Funding Agency (EFA). Academies have freedoms to set their own pay and conditions of service for staff, are free to deliver the curriculum as they see fit and can vary the length of school terms and the length of the school day. Academies must follow the same admissions guidance, exclusion processes and meet the statutory processes for pupils with Special Educational Needs and disabilities (SEND), however they may set their own admissions criteria. Academies are inspected by OFSTED using the same framework as other state funded schools.

The Council works closely with the Regional Schools Commissioner to ensure all new school proposals are supported by academy trusts that understand the needs and aspirations of the community.

Free Schools

A Free school is an all ability state funded school set up on a not for profit basis and can be set up by groups like:

- Businesses;
- Academy Trusts;
- Charities;
- Universities;
- Independent Schools;
- Teachers; and
- Parents.

A Free school has the freedoms of an academy; however, teachers in free schools do not necessarily need to have Qualified Teacher Status (QTS.) Free schools are funded on a comparable basis to other state funded schools and are inspected by OFSTED. Free schools cannot be academically selective. They have to take part in locally co-ordinated admissions so applications follow the same process.

Free schools (including University Technical Colleges (UTC) and Studio schools) are not defined by size or location; they can be primary, secondary, post-16 or all-through schools as there is not a one size fits all approach. They are able to teach a post 16 curriculum. Free schools can be located in traditional school buildings, offices or other buildings for example, church halls.

West Sussex currently has two free schools, Chichester Free School catering for the 4-19 age range and The Gatwick Free School in Crawley for the 4-16 age range. If approved by the Secretary of State, this type of school is fully funded both in terms of capital and revenue by central government and outside Local Authority control. West Sussex County Council is continually investigating what opportunities might exist for additional Free Schools in West Sussex.

Links to further information:

<http://www.westsussex.gov.uk/freechildcare>

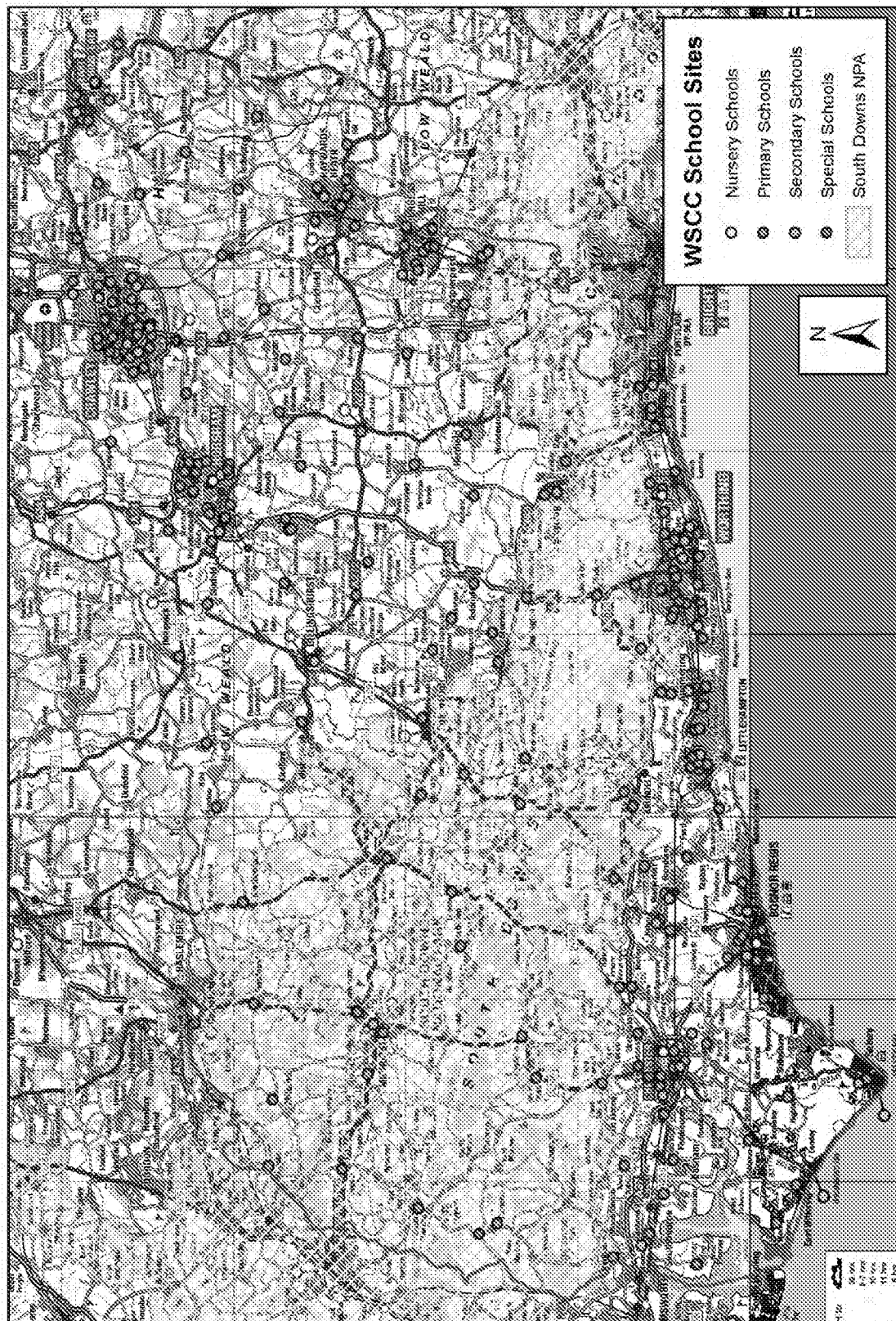
<https://www.westsussex.gov.uk/education-children-and-families/>

https://www.nao.org.uk/wp-content/uploads/2013/03/10089-001_Capital-funding-for-new-school-places.pdf

<https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/section-106-planning-obligations/>

OVERVIEW OF SCHOOL ORGANISATION, TYPES AND CAPACITIES

The map below shows the locations of the schools in West Sussex



The table below shows how the schools in West Sussex are currently structured

School Type			Key Stage	Age	Year Group
Primary	Infant	First *	EYFS	4+	R
			1	5+	1
				6+	2
	Junior		2	7+	3
				8+	4
				9+	5
				10+	6
Secondary		Intermediate	3	11+	7
		Secondary		12+	8
				13+	9
		4	14+	10	
			15+	11	

* In September 2017 the first, intermediate and secondary arrangement will no longer apply in West Sussex

Number of Schools

There are 297 publicly funded schools for pupils aged 0-19 in West Sussex (up to 25 for those with Special Educational Needs/Disabilities) with a wide variety of governance arrangements and sponsors. Below is a summary of the provision across the County and information relating to individual establishments can be found within the district/borough commentaries in which these schools are located.

Phase	Type of School	Total	Overall Total
Nursery	Maintained Nursery Schools	4	17
	Nursery Classes	13	
Primary (including First, Infant and Junior)	Community	99	228
	Voluntary Aided (Church of England)	28	
	Voluntary Aided (Catholic)	15	
	Voluntary Controlled (Church of England)	47	
	Foundation	1	
	Academy	38	
Secondary (including intermediate)	Community	13	38
	Voluntary Aided (Church of England)	2	
	Voluntary Aided (Catholic)	4	
	Voluntary Controlled (Church of England)	2	
	Academy	16	
	Foundation	1	
All Through	Free School	2	2
Special	Community Primary	3	12
	Community Secondary	4	
	Community All Through	3	
	Foundation All Through	1	
	Pupil Referral Units	1	
Total All Schools			297

Number on Roll (NOR) October 2016

Schools are required to complete returns giving the number of pupils on the school's register each term. The numbers in the table below are those from the start of the academic year (based on the autumn census provided by the DfE). The numbers in infant, first and primary schools do not include reception age pupils who may have deferred entry until the spring or summer term, the intermediate school in West Sussex has been entered into the secondary schools figure.

There are 111603* pupils aged 2-18 years in state sector schools in West Sussex as at October 2016 including nursery classes and Pupil Referral Units.

Phase	Number	Pupils	Capacity/ Planned Places
Nursery Schools	4	413	n/a
Nursery Classes	13	420	n/a
First	6	909	972
Infant	23	5618	6252
Junior	19	6918	8627
Primary	180	49923	50465
Intermediate	1	414	498
Secondary	37	44115	51412
Free Schools (all through)	2	1097	2040
Special Schools	11	1627	1617
Pupil Referral Units	1	149	n/a
Totals	297	111603	125483

*Taken from the Autumn Term School Census

COMMENTARIES BY DISTRICT/ BOROUGH COUNCILS

Introduction

The County is divided into seven Districts and Boroughs within which there are eight planning authorities including the South Downs National Park. These broadly relate to the catchment areas serving clusters of secondary schools but do not match our 24 locality areas perfectly. However, for the purpose of monitoring pupil numbers and determining the basic need in a particular area, they provide the most helpful framework for pupil place planning at a strategic level.

The information below is in two sections, short term (first five years) and longer term (up to 15 years), and sets out how West Sussex County Council is planning to provide for the educational needs relating to each District and Borough Council area, incorporating the eight planning authorities. There is a greater level of certainty in the short term, with many of the proposed schemes already coming forward. However, this document seeks to give an indication as to possible requirements, in order to mitigate future planned development in the longer term.

Whilst the information provided concentrates on starting school years, Reception for primary and infant schools, Year 3 for junior schools and Year 7 for secondary, it is recognised that pupils can apply to be admitted to any year group at any time throughout the academic year.

Funding to support these projects will include Government grants and contributions from developers.

DISTRICT and BOROUGH LOCAL PLANS

LOCAL PLANS HOUSING PROPOSALS NOVEMBER 2016

Local Planning Authorities (LPAs) must prepare and maintain an up-to-date Local Plan for their area covering a 15 year period. The LPAs in West Sussex are at different stages of Plan preparation. There are key stages that every authority needs to undertake when preparing a Local Plan. These include:

- Early consultation (Regulation 18);
- Pre-Submission Representation Period (Regulation 19);
- Submission;
- Public Examination;
- Proposed Modifications – if required by the Inspector; and
- Adoption.

The County Council is preparing Strategic Infrastructure Packages (SIPs) to set out the improvements required to enable the provision of County Council services to meet the needs of new strategic development. The SIPs reflect the County Council's statutory responsibilities including education provision. The SIPs will, or have, informed the preparation of each LPA's Local Plan and supporting evidence including the Infrastructure Delivery Plan (IDP).

The table below sets out which stage in the Plan preparation process each of the LPAs reached in January 2017.

District/ Borough	Most Recent Plan Preparation Stage	Date	Number of homes and plan period
Adur	<u>Local Plan</u> Submitted to the Secretary of State	October 2016	3609 homes 2011-2031
	<u>Shoreham Harbour Joint Area Action Plan</u> being prepared by ADC/BHCC/WSCC	December 2016 – February 2017	1450 homes 2011-2031 (968 in Adur, 400 in Brighton and Hove)
	Revised Draft for Consultation (Regulation 18)		
Arun	<u>Local Plan</u> Submitted to the Secretary of State	January 2015	11020 homes 2011-2030
	Inspector's recommendation to suspend Local Plan examination for 12-18 months – likely to result in revised housing numbers	July 2015	
Chichester	<u>Local Plan</u> adopted	July 2015	7388 homes 2012-2029
Crawley	<u>Local Plan</u> adopted	December 2015	At least 5100 homes 2015-2030
Horsham	<u>Local Plan</u> adopted	November 2015	At least 16000 homes 2011-2031
Mid-Sussex	<u>Local Plan</u> Submitted to the Secretary of State	August 2016	13600 homes 2014-2031
South Downs National Park	<u>Local Plan</u> Preferred Options consultation (Regulation 18)	September/ October 2015	4596 homes* 2014-2032 * requirement across the whole National Park Area
Worthing	<u>Core Strategy</u> adopted	2011	3200 homes 2010-2026
	New <u>Local Plan</u> Issues and Options Consultation (Regulation 18) - likely to result in revised housing numbers.	May/June 2016	

WSCC Planning and Transport Policy Team
January 2017

A key to the abbreviations used in tables on the following pages can be found below:

Key to School Type and Status	Type	Status	Other
First	F		
Infant	I		
Intermediate	IN		
Junior	J		
Primary	P		
Secondary	S		
Academy		A	
Community		K	
Foundation		F	
Free School		FS	
Voluntary Aided (Church of England)		VA	
Voluntary Aided (Catholic)		VAC	
Voluntary Controlled		VC	
Number on Roll			NOR
Published Admission Number			PAN

ARUN DISTRICT

Education in Arun

There are 36 primary schools in Arun district and six secondary schools, of which five have post 16 provision. The district is broken down into four planning areas, Angmering, Barnham/Westergate, Bognor/Felpham and Littlehampton (localities) and the schools are divided into these areas in line with their geographical location.

The need for primary school places depends on the local child population. An increase in the pupil population in the district has led to an increasing demand for school places and this trend is predicted to continue for the foreseeable future. Looking at the severity of demand in recent years the birth rate alone does not reflect the increase in starting/transferring school applications received. These increases are partly due to inward migration and an increase of pupils from the existing housing mix in the area.

This demand is not likely to be evenly spread across the district due to the geography of the area therefore, some localities will experience greater pressure than others.

Angmering – primary provision

The table below provides historic information on the total number of available primary places in the reception year across all primary schools in the locality (PAN) compared with the actual number of pupils starting school that year. A negative figure shows a shortage of places. A locality is deemed to be full when capacity in use exceeds 95%.

Year	PAN	Pupils in Year R	Surplus places	% of Capacity in use ¹
2011	263	267	-4	102%
2012	268	262	6	98%
2013	268	279	-11	104%
2014	298	269	29	90%
2015	298	285	13	96%
2016	298	263	35	88%

¹ We aim to create a minimum 5% buffer as per the National Audit Office report on Capital Funding for new school places published in 2013.

Primary pupil numbers in the locality are predicted to continue to rise in line with the national forecasts. Primary age provision across the locality have been or are planned to be expanded to cater for the demand. Regular meetings are held to monitor pupil numbers and identify ways to cater for rising pupil numbers in the future.

The table below details the projects we have or plan to undertake in order to cater for the increase in pupil numbers in the locality. It also shows, where known, details of applications submitted to the DfE for sponsors to open additional education provision to cater for the increase in pupil demand.

School	Year project commenced/ proposed implementation date	Project Type	Additional provision provided/ proposed	New PAN	*New Capacity
St Wilfrid's RC Primary	2011	Permanent expansion	5 places per year over 7 years	20	140
East Preston Infant	2015	Bulge class	Additional Cohort of 30 for 7 years	n/a	n/a
	2016	Permanent expansion	30 places per year over 3 years	90	270
East Preston Junior	2018	Permanent expansion	30 places per year over 4 years	90	360
¹ New Primary Academy	2019	New Free School	30 places per year over 7 years	30	210

* new capacity for permanent changes to schools PAN will take 3,4 or 7 years to be fully implemented depending on the school type as the school(s) only admit pupils into year R or year 3 with an increased PAN.

¹Subject to approval by the Department for Education.

Angmering – secondary provision

The table below provides historic information on the total number of available secondary places in Year 7 compared with the actual number of pupils starting school that year. A negative figure shows a shortage of places compared to the PAN. A locality is deemed to be full when capacity in use exceeds 95%.

Year	PAN	Pupils in Year 7	Surplus places	% of Capacity in use ¹
2011	252	241	11	96%
2012	252	230	22	91%
2013	252	254	-2	101%
2014	252	253	-1	100%
2015	252	252	0	100%
2016	252	252	0	100%

¹ We aim to create a minimum 5% buffer as per the National Audit Office report on Capital Funding for new school places published in 2013.

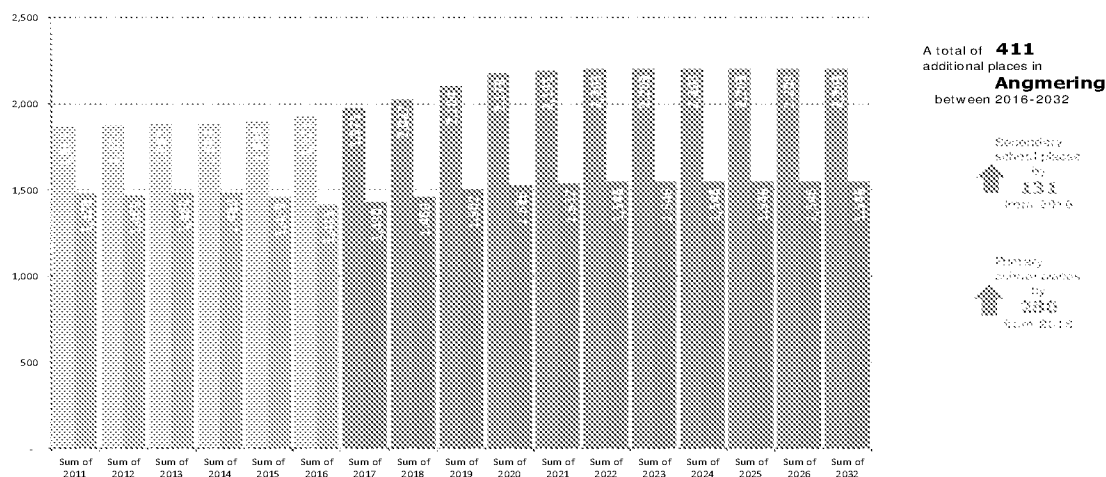
The increase in the cohorts in the primary schools is beginning to impact on the number of available places at the secondary provision in the locality. Expansion of The Angmering School will be required to cater for the continued demand for places.

The table below details the projects we have undertaken or plan to undertake in order to cater for the increase in pupil numbers, in the locality.

School	Year project commenced/ proposed implementation date	Project Type	Additional provision provided/ proposed	New PAN	*New Capacity
The Angmering School	2017	n/a	School able to offer additional places for Year 7 pupils within existing accommodation	n/a	n/a
	** 2018	Permanent expansion	18 places per year over 5 years	270	1350

* new capacity for permanent changes to schools PAN will take 5 years to be fully implemented as the school(s) only admit pupils into Year 7 with the increased PAN.

** Depending on consultation outcome.



Barnham/Westergate – primary provision

The table below provides historic information on the total number of available primary places in the reception year across all primary schools in the locality (PAN) compared with the actual number of pupils starting school that year. A negative figure shows a shortage of places. A locality is deemed to be full when capacity in use exceeds 95%.

Year	PAN	Pupils in Year R	Surplus places	% of Capacity in use ¹
2011	182	163	19	90%
2012	192	189	3	98%
2013	192	168	24	88%
2014	192	160	32	83%
2015	192	173	19	90%
2016	192	175	17	91%

¹ We aim to create a minimum 5% buffer as per the National Audit Office report on Capital Funding for new school places published in 2013.

Whilst previously pupil numbers in the area have been static, updated analysis shows, pupil numbers in the locality are predicted to rise in line with the historical trend for the next five years. The accommodation across the primary provision will require expansion to cater for the demand. Regular meetings are held to monitor pupil numbers and identify ways to cater for any potential rise in pupil numbers.

The table below details the projects we have undertaken or plan to undertake in order to cater for the increase in pupil numbers, in the locality.

School	Year project commenced/ proposed implementation date	Project Type	Additional provision provided/ proposed	New PAN	*New Capacity
Eastergate CE Primary	2012	Permanent expansion	10 places per year over 7 years	30	210
Existing Primary provision, not yet determined	2018	Permanent expansion	Additional 15 – 30 places per year over 7 years	tbc	tbc

*new capacity for permanent changes to schools PAN will take 3,4 or 7 years to be fully implemented depending on the school type as the school(s) only admit pupils into year R or year 3 with an increased PAN.

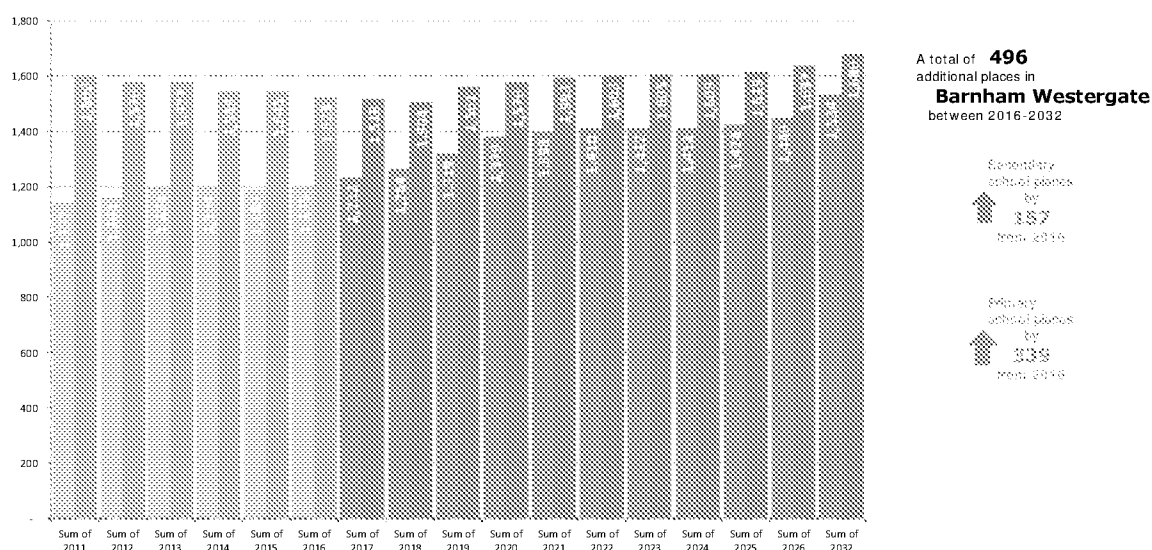
Barnham/Westergate– secondary provision

The table below provides historic information on the total number of available secondary places in Year 7 compared with the actual number of pupils starting school that year. A negative figure shows a shortage of places compared to the PAN. A locality is deemed to be full when capacity in use exceeds 95%.

Year	PAN	Pupils in Year 7	Surplus places	% of Capacity in use ¹
2011	300	275	25	92%
2012	300	278	22	93%
2013	300	275	25	92%
2014	300	260	40	87%
2015	300	273	27	91%
2016	300	243	57	81%

¹ We aim to create a minimum 5% buffer as per the National Audit Office report on Capital Funding for new school places published in 2013.

The current provision of places across the schools in the locality is sufficient to meet the demand from the cohorts in the primary schools. It should be noted that the St Philip Howard Catholic High School increased its PAN for 2016 from 150 to 180, although no additional accommodation has been provided by West Sussex.



Bognor Regis / Felpham – primary provision

In 2014 the Bartons Infant school was relocated onto the new housing development known as Site 6 as an all through primary. Its corresponding junior school (Laburnum Grove) also became an all through primary at this time with the name Bersted Green Primary.

The table below provides historic information on the total number of available primary places in the reception year across all primary schools in the locality (PAN) compared with the actual number of pupils starting school that year. A negative figure shows a shortage of places. A locality is deemed to be full when capacity in use exceeds 95%.

Year	PAN	Pupils in Year R	Surplus places	% of Capacity in use ¹
2011	600	565	35	94%
2012	600	653	-53	109%
2013	645	654	-9	101%
2014	675	635	40	94%
2015	705	691	14	98%
2016	705	709	-4	101%

¹ We aim to create a minimum 5% buffer as per the National Audit Office report on Capital Funding for new school places published in 2013.

Primary pupil numbers in the locality are predicted to continue to rise in line with the national forecasts. Primary age provision across the locality have been or are planned to be expanded to cater for the demand. Regular meetings are held to monitor pupil numbers and identify ways to cater for rising pupil numbers in the future further expansion at one or more schools in the locality is expected to be required for 2018.

The table below details the projects we have, or plan to, undertake in order to cater for the increase in pupil numbers in the locality. It also shows, where known, details of applications submitted to the DfE for sponsors to open additional education provision to cater for the increase in pupil demand.

School	Year project commenced/ proposed implementation date	Project Type	Additional provision provided/ proposed	New PAN	*New Capacity
Edward Bryant Primary	2013	Permanent expansion	30 places per year over 7 years	90	630
Rose Green Infant	2013	Bulge class	Additional Cohort of 30 for 3 years	n/a	n/a
Bartons Infant – Bartons Primary	2014	Permanent re-provision and expansion	Relocation of school and change of age range from infant (YR-Y2) to all through primary (YR-Y6)	30	210
Laburnum Grove Junior – Bersted Green Primary	2014	Permanent expansion	Expansion of school and change of age range from junior (Y3-Y6) to all through primary (YR-Y6)	60	420
Rose Green Junior	2016	Bulge class	Additional Cohort of 30 for 4 years	n/a	n/a
Nyewood CE Infant	2016	Permanent expansion	15 places per year over 3 years	90	270
Nyewood CE Junior	2017	Permanent expansion	15 places per year over 4 years	90	360
Existing Primary provision	2018	Permanent expansion	30 – 60 places per year over 7 years	tbc	tbc
¹ New Primary Academy	2019	New Free School	30/60 places per year over 7 years	30 60	210 420

*new capacity for permanent changes to schools PAN will take 3,4 or 7 years to be fully implemented depending on the school type as the school(s) only admit pupils into year R or year 3 with an increased PAN.

¹ Subject to approval by the Department for Education.

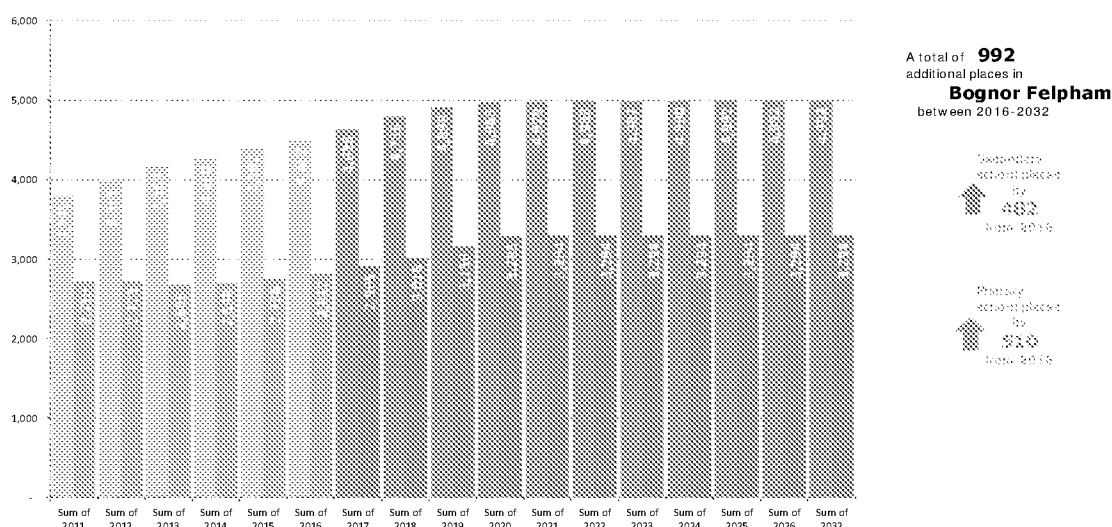
Bognor Regis / Felpham – Secondary provision

The table below provides historic information on the total number of available secondary places in Year 7 compared with the actual number of pupils starting school that year. A negative figure shows a shortage of places compared to the PAN. A locality is deemed to be full when capacity in use exceeds 95%.

Year	PAN	Pupils in Year 7	Surplus places	% of Capacity in use ¹
2011	540	439	101	81%
2012	540	434	106	80%
2013	540	444	96	82%
2014	540	494	46	91%
2015	540	511	29	95%
2016	540	538	2	100%

¹ We aim to create a minimum 5% buffer as per the National Audit Office report on Capital Funding for new school places published in 2013.

The Regis School was re-built in 2010 as part of the Building Schools for the Future programme and became an Academy in 2012. An increase to the PAN was made at this time to cater for the predicted increase in the cohorts seen in the primary schools. Whilst the number of entrants into the school in 2016 is close to the PAN, the school does currently have sufficient accommodation to cater for this need. However we will continue to monitor the pupil numbers in the locality.



Littlehampton – primary provision

Schools in the locality underwent a change in the provision in 2011 when the infant and junior schools in the locality were amalgamated to create all through primary schools. Following this the primary age pupil population stabilised for a few years. More recently the numbers of children requiring a school place at primary age has started to rise, due mainly in part to inward migration. Rustington Community Primary School agreed to increase its intake for reception-aged pupils in September 2015 by 30 places. Consultation for a permanent expansion was undertaken in the summer term of 2015 with the governing body and academy sponsor formally approving the expansion.

Additional places were still required in 2016 and two schools agreed to admit an additional bulge class to cater for the demand. Discussions are ongoing in the locality with the headteachers to determine if further permanent expansions will be required to meet the continuing demand for places.

The table below provides historic information on the total number of available primary places in the reception year across all primary schools in the locality (PAN) compared with the actual number of pupils starting school that year. A negative figure shows a shortage of places. A locality is deemed to be full when capacity in use exceeds 95%.

Year	PAN	Pupils in Year R	Surplus places	% of Capacity in use ¹
2011	395	398	-3	101%
2012	405	416	-11	103%
2013	435	442	-7	102%
2014	435	416	19	96%
2015	465	459	6	99%
2016	465	512	-60	110%

¹ We aim to create a minimum 5% buffer as per the National Audit Office report on Capital Funding for new school places published in 2013.

Primary pupil numbers in the locality are predicted to continue to rise in line with the national forecasts. Primary age provision across the locality have been or are planned to be expanded to cater for the demand. Regular meetings are held to monitor pupil numbers and identify ways to cater for rising pupil numbers in the future. Further expansion at one or more schools in the locality is expected to be required for 2018.

The table below details the projects we have undertaken or plan to undertake in order to cater for the increase in pupil numbers, in the locality. It also shows, where known, details of applications submitted to the DfE for sponsors to open additional education provision to cater for the increase in pupil demand.

School	Year project commenced/ proposed implementation date	Project Type	Additional provision provided/ proposed	New PAN	*New Capacity
Arun Vale Infant, Elm Grove Infant and Connaught Junior	2011	Amalgamation to form all through primary school	New 3 FE primary known as River Beach Primary	90	630
Wickbourne Infant and Flora McDonald Junior	2011	Amalgamation to form all through primary school	New 2 FE primary known as White Meadows Primary	60	420
St Catherine's C Primary	2012	Permanent expansion	10 places per year over 7 years	30	210
White Meadows Primary	2013	Permanent expansion	30 places per year over 7 years	90	630
Rustington Primary	2015	Permanent expansion	30 places per year over 7 years	90	630

School	Year project commenced/ proposed implementation date	Project Type	Additional provision provided/ proposed	New PAN	*New Capacity
Summerlea Primary	2016	Bulge class	Additional Cohort of 30 for 7 years	n/a	n/a
St Catherine's C Primary	2016	Bulge class	Additional Cohort of 30 for 7 years	n/a	n/a
	** 2017	Permanent expansion	30 places per year over 7 years	60	420
¹ New Primary Academy	2017	New Free School	60 places per year over 7 years	60	420

* new capacity for permanent changes to schools PAN will take 3,4 or 7 years to be fully implemented depending on the school type as the school(s) only admit pupils into year R or year 3 with an increased PAN.

** Depending on Consultation outcome.

¹Subject to approval by the Department for Education.

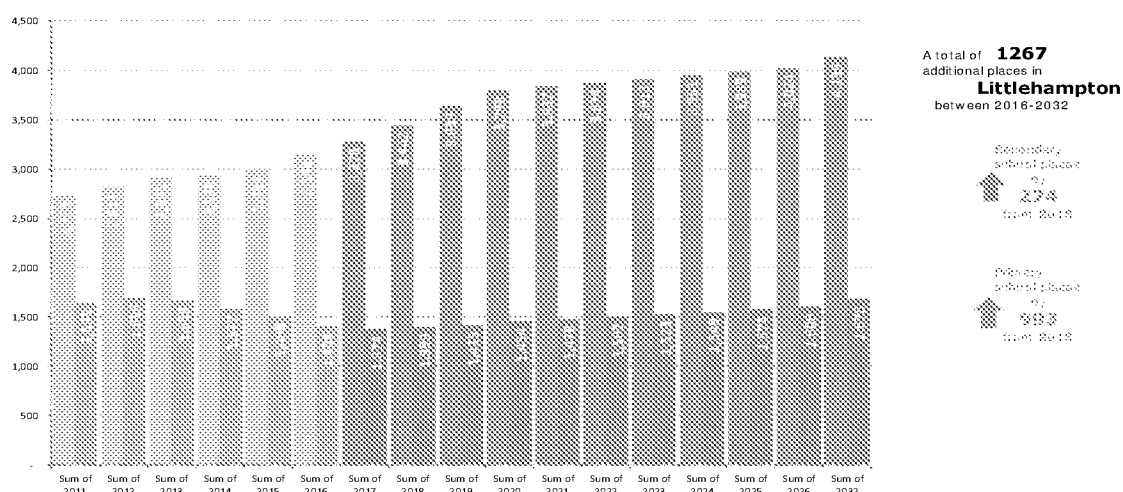
Littlehampton – secondary provision

The table below provides historic information on the total number of available secondary places in Year 7 compared with the actual number of pupils starting school that year. A negative figure shows a shortage of places compared to the PAN. A locality is deemed to be full when capacity in use exceeds 95%.

Year	PAN	Pupils in Year 7	Surplus places	% of Capacity in use ¹
2011	330	266	64	81%
2012	330	289	41	88%
2013	330	265	65	80%
2014	330	268	62	81%
2015	330	271	59	82%
2016	330	211	119	64%

¹ We aim to create a minimum 5% buffer as per the National Audit Office report on Capital Funding for new school places published in 2013.

In 2010 a new 330 place per year of age academy was built to replace the existing secondary provision. The current PAN of the school is sufficient to cater for the demand for places. However, the increase in the primary provision will increase the need to monitor the demand for places in the coming years.



NET CAPACITIES, NUMBERS ON ROLL & OCCUPANCY LEVELS AT PRIMARY SCHOOLS AUTUMN 2016

Planning Authority	School Name	Type	Status	Age Range	Net Capacity 2016/17	PAN Sept 2016	NOR OCT 2016
ARUN DISTRICT							
Barnham / Westergate Locality							
Arun	Aldingbourne Primary School	P	C	4-11	210	30	209
Arun	Barnham Primary School	P	A	4-11	315	45	310
Arun	Eastergate CE Primary School	P	VC	4-11	210	30	136
SDNP	Slindon CE Primary School	P	VC	4-11	84	12	65
Arun	Walberton & Binsted CE Primary School	P	VC	4-11	210	30	209
Arun	Yapton CE Primary School	P	VC	4-11	315	45	266
					1344		1195
Bognor Regis / Felpham Locality							
Arun	Barlons Primary School	P	C	4-11	210	30	208
Arun	Bersted Green Primary School	P	C	4-11	420	60	270
Arun	Bishop Tufnell CE (Aided) Infant School	I	VA	4-7	267	90	267
Arun	Bishop Tufnell CE (Aided) Junior School	J	VA	7-11	360	90	361
Arun	Downview Primary School	P	A	4-11	630	90	481
Arun	Edward Bryant School	P	A	4-11	630	90	563
Arun	Nyewood CE (Aided) Infant School	I	VA	4-7	270	90	255
Arun	Nyewood CE (Aided) Junior School	J	VA	7-11	360	90	320
Arun	Rose Green Infant School	I	C	4-7	270	90	269
Arun	Rose Green Junior School	J	A	7-11	390	93	384
Arun	South Bersted CE Primary School	P	VC	4-11	210	30	201
Arun	Southway Primary School	P	A	4-11	630	90	614
Arun	St Mary's Catholic (Aided) Primary School	P	VAC	4-11	300	45	289
					4947		4482
Angmering Locality							
SDNP	Clapham & Patching CE School	P	VC	4-11	56	8	64
Arun	East Preston Infant School	I	C	4-7	240	90	219
Arun	East Preston Junior School	J	C	7-11	243	60	246
Arun	Ferring CE Primary School	P	VC	4-11	210	30	202
Arun	Georgian Gardens Community Primary School	P	C	4-11	420	60	419
SDNP	St John The Baptist CE Primary School	P	VA	4-11	140	20	141
Arun	St Margaret's CE Primary School	P	VA	4-11	490	70	493
Arun	St Wilfrid's Catholic Primary School	P	VAC	4-11	140	20	139
					1939		1923
Littlehampton Locality							
Arun	Arundel CE Primary School	P	VA	4-11	202	30	196
Arun	Lymminster Primary School	P	C	4-11	210	30	206
Arun	River Beach Primary School	P	A	4-11	670	90	680
Arun	Rustington Community Primary School	P	A	4-11	410	60	478
Arun	St Catherine's Catholic Primary School	P	VAC	4-11	240	30	231
Arun	St Mary's CE Primary School	P	VA	4-11	105	15	100
Arun	St Philip's Catholic Primary School	P	VAC	4-11	203	30	188
Arun	Summerlea Community Primary School	P	C	4-11	462	60	482
Arun	White Meadows Primary School	P	A	4-11	635	90	581
Arun					3137		3142

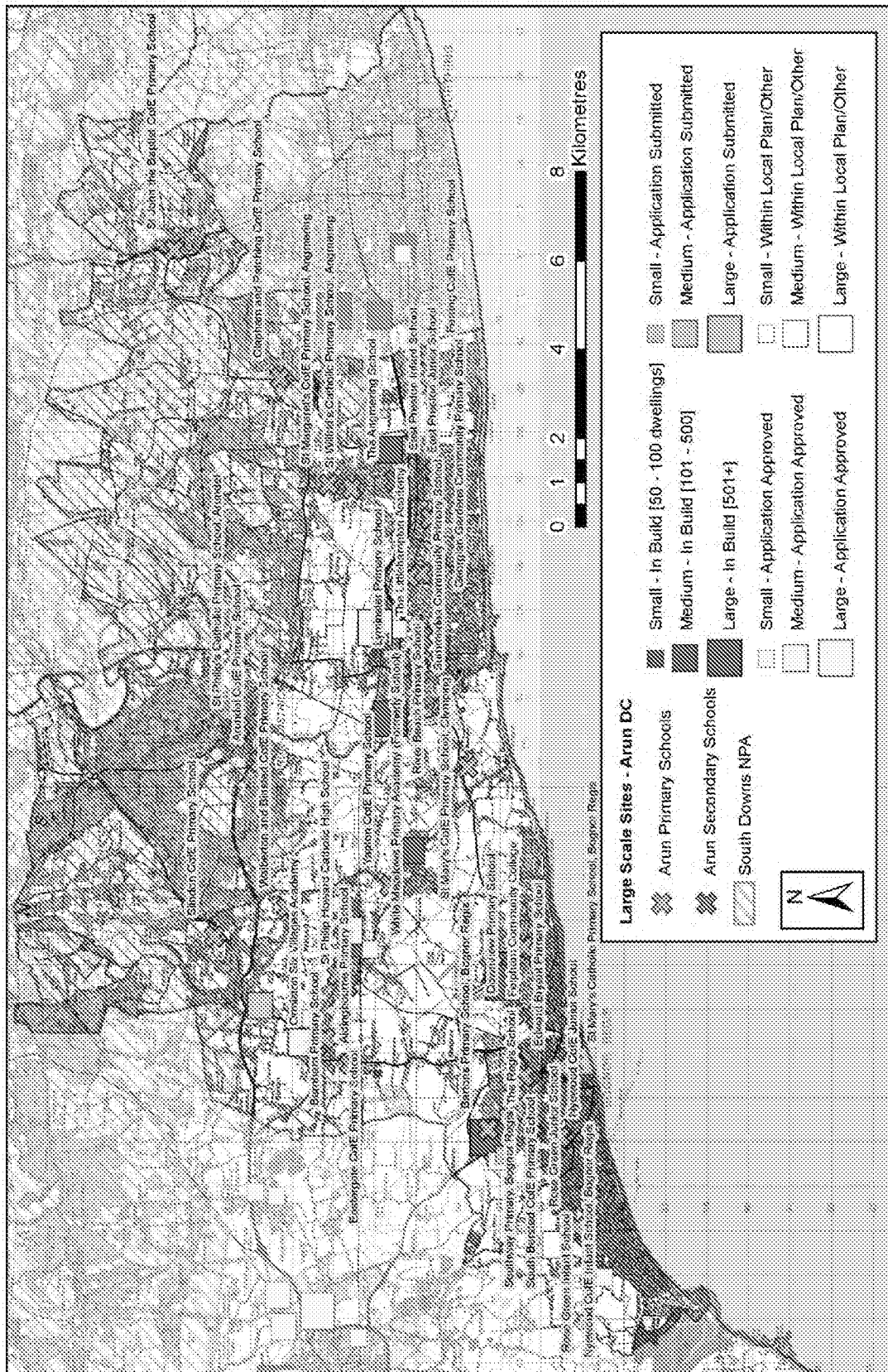
NET CAPACITIES, NUMBERS ON ROLL & OCCUPANCY LEVELS AT SECONDARY SCHOOLS AUTUMN 2016

Planning Authority	School Name by Locality	Type	Status	Age Range	Net Capacity 2016/17	PAN Sept 2016	NOR OCT 2016
ARUN DISTRICT							
Barnham / Westergate Locality							
Arun	St Philip Howard Catholic High School	S	VAC	11-18	1033	150	974
Arun	Ormiston Six Villages Academy	S	A	11-16	823	150	549
					1856		1523
Bognor Regis / Felpham Locality							
Arun	The Regis School	S	A	11-18	1993	300	1449
Arun	Felpham Community College	S	C	11-18	1400	240	1363
					3393		2812
Angmering Locality							
Arun	Angmering School, The	S	C	11-18	1486	252	1415
					1486		1415
Littlehampton Locality							
Arun	Littlehampton Academy, The	S	A	11-18	1900	330	1404
					1900		1404

PLANNED PLACES, NUMBERS ON ROLL & OCCUPANCY LEVELS AT SPECIAL SCHOOLS AUTUMN 2016

Planning Authority	School Name by Locality	Type	Status	Age Range	Planned places 2016/17	NOR OCT 2016
ARUN DISTRICT						
Littlehampton Locality						
Arun	Cornfield	SP	C	11-16	82	82

Angmering, Barnham/Westergate, Bognor Regis and Littlehampton Long Term



The Arun Local Plan 2011-2031 Publication Version sets out the vision for the development of Arun up to 2031. The Local Plan was submitted on 30th January 2015 for independent examination. The Submitted Local Plan makes provision for 11020 houses over the period 2011-2030, which equates to an average of 580 homes per year. This includes the development of strategic sites and parish housing allocations. The Examination Hearings were held in June 2015 and the Inspector concluded that the housing needs figure of 845 dwellings per annum was a more robust figure which should be tested by the Council. The inspector recommended a period of suspension to allow for Arun DC to re-examine its Objectively Assessed Housing Need figure and to prepare main modifications to the Plan to show how the housing needs figure can be met.

The County Council has been working with Arun District Council to assist with the consideration of options for meeting the most up to date housing requirement figure. This has involved testing a range of options through the preparation of the Infrastructure Capacity Study and Delivery Plan, (phase one has been published on the Arun District Council website). This forms part of the evidence base for updating the Local Plan. It contains extracts from Planning School Places 2016 relating to short-term solutions for the schools in the District as well as a high-level response to each of the identified strategic sites.

The infrastructure study, as well as other evidence base documents, will assist the District Council with the identification of main modifications to the Plan. These will be consulted upon and considered by the Inspector in due course. Further information on the Arun Local Plan can be found at:

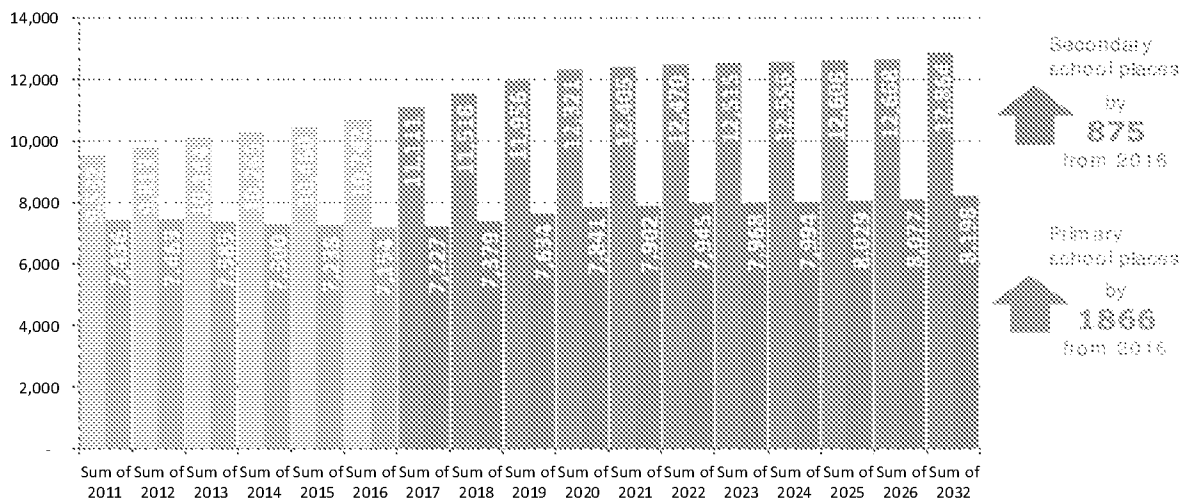
<http://www.arun.gov.uk/local-plan-examination>

Within Arun District, several Neighbourhood Plans are also being prepared. These identify sites to deliver the parish allocations and where 'made', form part of the statutory development plan for the area. Further information on Neighbourhood Plans in Arun can be found at:

<http://www.arun.gov.uk/neighbourhood-planning>

The graph shows how we believe the pupil population will increase across the District over the next 15 years.

A total of **2741** additional places in **Arun** between 2016-2032



**Planning Obligations: Explaining Contribution
Calculations, October 2016 Update**

Planning Obligations: Explaining Contribution Calculations

Use our contributions calculators to find out how much you may be liable to pay. You need to add various inputs, such as parking spaces, housing totals, and commercial floorspace.

Visit our website to download the calculators: www.westsussex.gov.uk/s106.

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Assessment of Additional Needs

Additional needs for services are assessed by calculating the additional population likely to come from a proposed development.

The figures in the table below show the **occupancy rates** from Census 2011 (number of people) per dwelling type and size for open market and social housing. These rates are used to calculate the additional population likely to come from a proposed development. For an outline planning application, where the housing mix is not yet determined, the average occupancy rate is 2.5 persons per dwelling.

Dwelling Size	Occupancy Rate (House)	Occupancy Rate (Flat)
1 bed	1.5 persons	1.3 persons
2 bed	1.9 persons	1.9 persons
3 bed	2.5 persons	2.4 persons
4+ bed	3.0 persons	2.8 persons

Exclusions and reductions are as follows.

- Demolished or converted dwellings, excluding those that have been vacant for five or more years, are subtracted from the gross gain. The population from such dwellings will be deducted according to the type of accommodation and relevant occupancy rate, so we are looking for the *net* increase in residents.
- Demolition of existing bedsit accommodation (with an assumed occupancy of one person) is excluded for all services except those for children and young people as it is unlikely that bedsits will accommodate children.
- In Horsham and Mid Sussex districts, a 33% reduction of the additional population from all social housing units is granted due to the number of concealed households moving into the development. Concealed households are households currently living with friends and relatives because they are unable to gain access to the housing market.
- In the districts and boroughs of Adur, Arun, Chichester, Crawley, and Worthing, no contributions are required for social rented housing but contributions for other types of affordable housing may be required.

- Contributions are not sought from developments of sheltered housing for the very frail elderly or care homes.

Adults' Services

We provide a range of services to support older people and people with a disability or mental health need. These services include day centres, care homes, housing schemes, and shared use of community facilities. As new development may increase demand and pressure on existing facilities, we may request contributions for either new infrastructure or extensions to those facilities.

Education and Schools

We have a statutory responsibility to provide education for all children of school age, normally ages four to 16, and to ensure sufficient nursery education for three- and four-year-olds in partnership with other sectors.

Our policies for admission of pupils to schools aim to ensure that parents can normally expect places for their children at the schools serving the area in which they live.

The housing and population characteristics of the wider area will provide a guide in the assessment of the likely age profiles and additional children arising from the proposed development. The average standards are set out in the table below.

School Type	Child Product
Primary (ages 4 to 11)	25 per 100 dwellings
Secondary (ages 11 to 16)	18 per 100 dwellings
Secondary (ages 16 to 18)	4 ¹ per 100 dwellings

We have adopted the Department for Education's average build cost multipliers with regional adjustment factors. Where the cost multiplier has not been updated for the new financial year, the most recent cost multiplier will be used and updated according to the relevant change in the Royal Institution of Chartered Surveyors' Building Cost Information Service's All-In Tender Price Index.

These cost multipliers are building costs per pupil place, derived from data collected by the Department for Education (formerly the Department for Children, Schools and Families) on the actual costs of enlarging existing schools and building new schools. The cost multipliers include fixed equipment costs and fees but exclude the costs of providing loose equipment.

The WSCC calculator is used for smaller developments up to and including 500 units where contributions are sought for the improvement and expansion of **existing** schools. Strategic developments of more than 500 homes are subject to bespoke negotiation.

'Early Years' provision should be included alongside new primary school sites.

Calculating Contributions

Financial contributions for school infrastructure are broken up into four categories: primary, secondary, middle, and sixth form. Depending on the existing local infrastructure, only some or none of these categories of education will be required.

Where the contributions are required, the calculations are based on the additional amount of children, and thus school places, that the development would generate, referred to as TPR (**total places required**). The TPR is then multiplied by the

¹ For children aged 16-18, the child product is 7 pupils per 100 dwellings, assuming a 100% cohort survival rate. In West Sussex, however, the average rate for pupils progressing from Year 11 to Year 12 and 13 is 54%. This, in effect, means a reduction from 7 pupils per 100 dwellings jointly for the two year groups to 4 pupils per 100 dwellings.

Department for Education's school building costs per pupil place, known as the cost multiplier.

- School Contributions = TPR x cost multiplier

The TPR is determined by the number of year groups in each school category multiplied by the child product.

- TPR = (Number of year groups) x (child product)

Year groups are set out in the table below.

School Type	Number of Year Groups
Primary	7 year groups (ages 4 to 11)
Secondary	5 year groups (ages 11 to 16)
Middle	3 + 1 year groups (ages 8 to 11 and 11 to 12)
Sixth Form places	2 year groups (ages 16 to 18)

Child product is the adjusted education population multiplied by the average amount of children, taken to be 14 children per year of age per 1,000 persons for houses and bungalow (average figure taken from 2001 Census). For flats and maisonettes, the average number is five children per year per 1,000 persons.

- Child Product = Adjusted Population x 14/1,000 (or 5/1,000 for flats)

The adjusted education population for the child product excludes population generated from one-bed units, sheltered and 55+ age-restricted housing, and social-rented housing on a district by district basis according to supplementary planning guidance, as a nil child product is assumed for these dwellings.

The **cost multiplier** is a figure released by the Department for Education. It is a school building cost per pupil place as at 2016/2017, updated by Royal Institute of Chartered Surveyors' Building Cost Information Service's All-In Tender Price Index.

The cost multipliers are set out in the table below.

School Type	Cost Multiplier
Primary	£15,558 per child
Secondary	£23,442 per child
Sixth Form places	£25,424 per child

To find out whether education contributions are required, check the locality table and education maps on our website: www.westsussex.gov.uk/s106.

Other Services for Children and Young People

Contributions will be sought where necessary towards youth provision and other facilities such as residential care. Though required for large strategic developments of 500+ dwellings, each development will be considered on a case-by-case basis.

Libraries

As recommended by the International Federation of Library Associations and Institutions, we have adopted standards that relate service provision to population numbers.

The applied average standard is 32m² per 1,000 population, varying from 30m² to 35m². Where a library is unable to meet these standards due to development, a reasonable contribution will be requested towards the service based on the adopted floorspace

standards, the library building cost per square metre and the additional population coming from the proposed development.

For catchment populations up to 4,000, service provision will be by means of mobile libraries. For populations of over 4,000, the service will be delivered through built libraries. The type of library will be determined by the size of the catchment population.

Where the best means for the delivery of library services to a new development is a mobile library, you will be required to provide a suitable parking area (with good links to the local transportation network and access to a power supply) and/or a proportionate financial contribution towards the costs of providing and stocking an extra vehicle.

Where the appropriate means for the delivery of library services to a new development is a built library, you will be required to make fair and proportionate contributions towards the costs of providing and stocking a new or improved permanent building, including any necessary land acquisition. Where the existing capacity of a library would not be able to serve new development, the contribution will be calculated as follows:

- Additional Population x Cost per Head of Improvements to Library Services

The needs of the library service will have to be assessed individually and in context. Occasionally, more than one feasible way of meeting those needs within our standards will be identified. For example, improvement of the mobile library service in combination with an enhancement of facilities at the major library in the nearest town could be an acceptable alternative to development of a neighbourhood library, on site or nearby, for about the same overall cost. Therefore, where the library needs of a particular development proposal may be satisfied equally well by one or more alternatives, you will be required to contribute towards the most appropriate solution identified by us.

Calculating Contributions

Two methodologies are used for calculating library infrastructure contributions. These have been locally tailored on the basis of required contributions and the nature of the library in the locality.

Library infrastructure contributions are determined by the population adjustment resulting in a square-metre demand for library services.

The square-metre (SQM) demand is multiplied by a cost multiplier which determines the total contributions:

- Contributions = SQM demand x Cost Multiplier

The **square-metre demand** for library floorspace varies across the relevant districts and parishes based on available library infrastructure and the settlement population in each particular locality.

The local floorspace demand (LFD) figure varies between 30 and 35 square metres per 1,000 people and is provided with each individual calculation.

- Square Metre Demand = (Adjusted Population x LFD) / 1,000

The **cost multiplier** for providing relatively small additions to the floorspace of existing library buildings is currently £3,930 per square metre. This estimated figure was updated by our quantity surveyor for 2013/2014.

Localised cost multipliers have been determined on the basis of the required amount needed for funding particular library service by the population catchment.

- Crawley: **£83.30** per person
- Horsham: **£114** per person

Fire and Rescue Services

Fire Hydrants

Works may be needed to fulfil our duty to ensure the provision of an adequate supply of water for fire fighting. Requirements for the provision of fire hydrants affixed to water mains and the carrying out of other works that are necessary to ensure adequate supplies of water, in terms of both volume and pressure, may be sought either as planning conditions or possibly through a legal agreement.

Adequate access for fire-fighting vehicles and equipment from the public highway must be available and may require additional works on or off site, to comply with Building Regulation BS5588 Part 5 – 2004.

The locations and spacing of hydrants should conform to guidance given by the Fire and Rescue Service and, where possible, such locations will be at main roads, feeder roads or road junctions where they are readily visible.

Full details of the Fire and Rescue Service standards for access roads (including weight requirements) and for water supplies are available on request.

The installation costs of fire hydrants will also be required on developments as a direct cost to the developer, as required under the Fire Services Act 2004.

Infrastructure

In addition to fire hydrants, you may be required to contribute towards the provision of new fire-fighting services or facilities so that we can meet our statutory requirements and prescribed standards of fire cover for the area, as set out in the Fire and Rescue Services Act 2004. The costs will be based on the additional population coming from the proposed development, the cost per square metre of building fire stations, and the infrastructure improvements necessary to serve the proposed development.

Contributions will be used to finance new fire-fighting equipment and services, extensions to fire stations or the provision of new facilities or other fire and rescue infrastructure as necessary. Contributions will be based on:

- Additional population x cost per head of fire and rescue infrastructure improvements

Only in relation to largest scale new developments, such as possibly a new settlement, might contributions be required to cover the full cost of providing an entirely new fire station which is not replacing an existing service. In such cases, it would be expected that land would be provided free of charge.

Calculating Contributions

The contribution for Fire and Rescue Services infrastructure is determined by the population adjustment multiplied by the relevant cost multiplier for the provision of services.

- Fire and Rescue Contributions = Adjusted Population x Cost Multiplier

The **adjusted population** is the sum of the occupancy rates for the net dwelling increase with the exclusion of social housing increase.

The **cost multiplier** is calculated by dividing the total cost of necessary fire and rescue infrastructure within the relevant division by the projected population for 2016. The cost multipliers are set out in the table below.

Division	Cost Multiplier
Southern (Adur, Arun, Chichester, Worthing)	£13 per person
Northern (Crawley, Horsham, Mid Sussex)	£50 per person

Waste Management

Contributions for waste management services, such as recycling facilities and waste sites, have not been required since 2011/12. This situation is monitored and improvements may be considered for the future.

Total Access Demand (TAD)

The methodology is based on total access to and from a development.

An infrastructure contribution is required for each occupant or employee provided with a parking space, as they would be more likely to use the road infrastructure.

A sustainable transport contribution is required for each occupant or employee not provided with a parking space as they would be likely to rely on sustainable transport.

- $TAD = \text{Infrastructure contribution} + \text{Sustainable Transport contribution}$

The **infrastructure contribution** is determined by the net increase in car parking spaces, multiplied by our estimated cost of providing transport infrastructure per vehicle. That cost multiplier is currently £1,000 per parking space.

- $\text{Infrastructure contributions} = \text{Car parking spaces} \times \text{Cost multiplier}$

The **sustainable transport contribution** is derived from the net car parking increase subtracted from the projected increase in occupancy of the development. The sustainable transport contribution increases where the population is greater than the parking provided. The sustainable transport figure is then multiplied by our estimated costs of providing sustainable transport infrastructure cost multiplier (currently £500).

- $\text{Sustainable transport contributions} = (\text{net car parking} - \text{occupancy}) \times 500$

Occupancy is determined by projected rates per dwelling and projected people per commercial floorspace as determined by us.

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