Summary of Comments Received (respondent ref in brackets)	Council's Response
Calculating Pupil Yield	
The pupil product ratio should be calculated according to future rather than past trends (26, 24, 19) Document should acknowledge a continual review of pupil yields (1) Pupil yield factor for primary pupils is exceptionally high in relation to the yield for secondary pupils which is "nearer" the average. (23) Paper over-estimates the propensity of new development to comprise households containing school-age children and is thereby seeking more contributions that can be justified. Object to pupil yield forecast methodology (the Development Impact Calculator) which produces higher yield rates than adjoining authorities and fails to take into account different types of development or national trends in average dwelling occupancy (19)	The pupil yield figures are based on a very recent survey of 500 new homes in West Berkshire which provides a robust indication of pupil yield arising in this area. Further research will be carried out in the future to assess any changes which may occur.
 Pupil yield factor methodology should be clearer and include information about how it is tailored to reflect increases in small dwellings and single person households (1). 	The research included a range of dwelling sizes and types. The methods of calculation will be kept under review but household size is not projected to decline significantly in West Berkshire over the next few years.
 Document should reflect likely changes to household occupancy rates for phased development (ie over a ten year period). A decline in household occupancy rates would result in less impact in ten years compared with a development over the next two years (19) Pupil yield factors are high for medium and long-term assessments of accommodation needs. Only valid for short term assessment (12) 	Contributions need to take account of the likely pupil generation from a development at the time it is constructed and capacity of schools adjusted accordingly to take account of this.
 Contribution should equate to the actual cost of remedying the deficiency not a standard cost multiplier that may bear no 	The DfES cost multipliers provide the cost of providing pupil places and the regional allowance takes into account building costs in the

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relevance to the cost. (26)	West Berkshire. The formula approach provides a robust and straightforward approach that is applicable to all developments and meets the requirements of Circular 1/97
Factors influencing level of contribution	
 Contribution should reflect the size and nature of proposed dwellings (24, 19) 	The impact calculator takes into account the number of dwellings and is appropriate for most forms of development.
 Contributions should not be payable if there is existing and projected school capacity within the catchment, or capacity could be generated by adjustment of school catchment areas (26) 	The assessment takes account of existing capacity. The adjustment of school catchments is a long and complex process which involves substantial consultation. It cannot be assumed that catchments can be altered in response to new development. Contributions reflect existing capacity and are not sought if sufficient capacity exists.
 Contributions should only be sought from open market housing. Contributions should not be sought from Affordable housing as occupants will already be resident within the district and would not represent an addition to the school role for which extra provision is required.(24) 	Affordable housing is generally aimed at families and therefore there will be an impact on local schools. It is not necessarily the case that the occupants of affordable housing currently reside in the same catchment.
 Pupil yields should reflect that many house moves are local moves which may not require children to change school (1) 	This is not borne out by the research. As stated above the impact has to be met by the school in the catchment area where the development is located.
 Calculation of Pupil Yield Number should take into account the number of children attending private school or educated at home. (3) 	The number of children not in school is already factored into the calculation. It is not possible to determine whether the pupils generated by a development will attend private school. However, the Council is obliged to provide education to all children within a catchment.
Calculation of Contributions	
 Use of cost multipliers produced by Dept. for Education and Skills is questionable because their purpose is for allocating loan sanction to Local Authorities. (12) Costings applied to pupil yields are simplistic and arbitrary. Paper should recognise the potential 	The cost multipliers are used as they give the cost of providing schools places. They take into account the needs of the infrastructure and not just classroom provision. This approach is consistent with Circular 1/97. It is not reasonable to carry out

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for different costs depending on the provision required and not use standard cost multipliers. (1)	detailed feasibility studies for all planning applications submitted.
 More appropriate for the topic paper to apply the cost per square metre figure detailed in the "Education Building Projects: Information on Costs and Performance Data" produces quarterly by the Education and Skills Schools Building Unit. (12) 	The use of the cost multipliers is appropriate as set out above. The recent increases are to reflect more realistically the cost of accommodation provision and increased room sizes from the revised Building Bulletin 82.
 Paper should note that revised Building Bulletin 82 is only at consultation stage. (12) 	BB82 as revised is now being used as the industry standard by both central and local government.
 Document should recognise the consequences of potential abnormal development costs and subsequent consequences on the regeneration of brownfield sites and the delivery of other planning objectives. (24) 	The development cost of a site does not lessen the impacts created by the proposed new development. Abnormal development costs are unusual and it is not necessary or appropriate for the document to refer to exceptional cases.
 SPG should also address the cost of providing/recruiting additional teaching staff. 	At present the SPG reflects the physical changes required to accommodate additional pupils.
 Contributions should be limited to making good any shortfall in existing or programmed resources 	Contributions sought address the impacts created.
 Amend para 2.5 by including "capacity of schools over a two mile radius for primary and an three mile radius for secondary schools in line with DfES methodology to assess" 	The use of a radius is not appropriate as the Council is required to provide places within the catchment school and not the closest school.
<u>Thresholds</u>	
 Object to the "arbitrary tax" on development for sites of 1 – 14 dwellings which is contrary to Circ 1/97 (1) Education contribution should be contained within the basic tariff (3) 	The basic level of contribution approach has been removed from the SPG but it remains appropriate for smaller schemes to contribute. See comments on response to Core Guidance
 SPG should address the issue of contributions to a secondary school from developments smaller than 5800 dwellings, but still substantial in nature. (Using the table at paragraph 2.10, and applying the secondary pupil yield factor indicates 5800 dwellings are needed to generate the number of secondary pupils for a six- 	The draft SPG acknowledges that large developments may generate the need for a new school or reorganising schools provision in an area. These matters would be for discussion with the developer at the time of the proposal.

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form entry secondary school) (23)	
 Exceptions (para 2.8) should also include one-bed flats and affordable housing. (12) 	See comments on affordable housing above. Allowance is made for the fact that one bedroom properties are less likely to generate additional pupils
Processes	
 Concern regarding the 'fluidity' of the figures. Pre-application advice should be 'held firm' for a period of time to ad certainty to the planning process (3) 	There can be a considerable amount of time between pre-application discussions and a planning application during which costs of providing necessary facilities may have increased. See the section in the Core Guidance on Implementation.
<u>Other</u>	
 Support (2) 	The Council notes the support for paragraph 2.1
 Policy OVS.3 does not refer to contributions towards education. The topic paper is therefore not supported by local plan policy, contrary to government advice. (4) 	Policy OVS2 seeks to ensure that the services made necessary by the development are provided. Education is one of the services likely to be impacted upon by new development.
 Object to a presumption in favour of a blanket contribution. Document should acknowledge that the normal responsibility for education provision rests with the local education authority programme of resources that takes into account the demands of new housing development identified through the local plan. Demands placed upon school capacities from housing quantum within the local plan period should be accommodated within the Council's education resource programme.(24) 	It is appropriate that contributions are made to address the impacts on schools that will be created by new development. This is fully consistent with Circular 1/97.
 The term "regional allowance" in paragraph 2.3 needs explaining (23) 	The regional allowance reflects the higher costs of building in West Berkshire compared to national building costs and are provided by the Department for Education and Skills.
 Replace "may " with "will" in paragraph 2.5 (23) 	May is correct word as adjustments may not always be required.
 Agree with paragraph 2.1. (23) 	Noted.