

Wrexham County Borough Council

Education Department Response to Flinders Chase

Education Issues Paper and Technical Note

Methodology

The standard methodology that is consistently applied when assessing the numbers of pupils generated from a development includes the two nearest English medium schools (primary and secondary), the nearest Welsh school (primary and secondary) and the nearest Faith school (primary and secondary).

The number of pupils generated by a proposed development will be rounded up or down to the nearest whole pupil, and will be assessed against the capacity of schools in the local area where the new housing development is proposed. The Council will take account of the number of pupils on the school roll (NOR) to assess whether any surplus capacity exists within the development area.

Net pupil places required above projected capacity are then calculated by offsetting a development's projected pupil yield against any existing school place surplus. The figures used to calculate the school numbers will be made available to developers as part of the justification for requesting a financial contribution.

The applicant's suggestion for all schools to be included in the assessment contravenes our current practice, which is applied consistently to all requests for developer contributions.

The applicant only references English medium pupil places. The authority must also plan for demand in Welsh medium education and faith education which needs to be taken into account when planning future education provision (further details below).

Demand for Welsh Medium Education

A key difference between the education system in England and Wales is that local authorities in Wales must give consideration to demand for Welsh medium education.

Cymraeg 2050 is the Welsh Government's strategy for the promotion and facilitation of the use of the Welsh language. It sets out a long-term approach to achieving a target of one million Welsh speakers by 2050. The aim of the strategy is to reach a position where the Welsh language is an integral part of all aspects of everyday life. Wrexham Council's Welsh in Education Strategic Plan (2022-2031) (WESP) and Welsh Language Promotion Strategy (2022-2027) directly support the Welsh Government's vision and will become the cornerstone of the Council's contribution towards meeting the target outlined in the Welsh Government's strategy.

Wrexham's Council Plan (2020-2023) includes the Welsh Language and Culture as a strategic planning principle. It recognises that Wales has two official languages, Welsh and English, and services and information should be equally available in both.

In order to support Welsh Government's strategy Cymraeg 2050 and objectives / targets in the Council's Welsh in Education Strategic Plan (WESP), the Council will use a percentage across all contributions towards Welsh-medium provision. This is necessary in order for Wrexham to meet its WESP and WG target of 23% of the cohort accessing Welsh Medium Education by 2030/31 and in the context of available data which identifies emerging requirements for Welsh medium education.

Ysgol Morgan Llwyd is currently only one pupil place below its PAN (192 compared with 193 in 2024). The authority expects this trend to continue due to the success of the Trochi provision which is likely to take Ysgol Morgan Llwyd to at or above PAN in the next 1-2 years. The Trochi provision provides a 'taster course' during the Summer term of Year 6 so that learners from English medium provisions can decide whether to transfer to a Welsh medium secondary school. This enables the Authority to attract many more pupils and families to consider Welsh medium education as an option.

Demand for Faith Education

15.2% of the cohort of primary aged pupils and 11% of secondary aged pupils (based on Reception to Year 11 for Primary and Secondary Schools from PLASC 2024) have opted for faith education in Wrexham. The latest School Admissions data shows that demand for faith education continues to grow, particularly in the secondary sector.

St. Joseph's Catholic and Anglican High School has been consistently above its Published Admission Number (PAN) for the past 4 years (2021: 144, 2022: 143, 2023: 150, 2024: 142). There have been an increasing number of appeals for places at the school in 2024 (circa 68). The school is currently above its PAN (142 compared with 137 in 2024). In addition, for the past 4 years the school has not had more than 10% surplus places. There has been significant growth at St. Joseph's over the last 4 years and we expect this trend to continue over the next 5 years, resulting in oversubscription at the school by over 10% and an increasing number of appeals.

Demand at other Secondary Schools in Wrexham

Ysgol Clywedog

Whilst Clywedog has been below PAN for 4 consecutive years, in 2021 and 2023, they were only just below PAN at 171 and 176 respectively. The school is currently below PAN (146 compared with 178 in 2024), however it is anticipated that the popularity of the school is likely to improve under a new Headship from 2024 onwards.

Rhosnesni

Rhosnesni is currently at its Pupil Admission Number (240 in 2024) and the school had more than 10% surplus places in 2021 and 2023.

Grango

Grango has been above PAN for 3 consecutive years during the period 2021–2023 (122, 121, 124). The school is currently at PAN (118 in 2024). The school has not had more than 10% surplus places in the last 4 years.

Bryn Alyn

Whilst Bryn Alyn has been below PAN for 4 consecutive years, the PAN has increased steadily during that period, from 124 in 2021 to 173 in 2024. The school is currently just below PAN (173 cf. 179 in 2024). The school has not had more than 10% surplus places in the last 4 years. There is also a significant housing development earmarked in the LDP for this area which will impact on pupil places in this school.

Measuring the Capacity of Schools

Welsh Government's Circular No. 021/2011 'Measuring the Capacity of Schools in Wales' describes the method of assessing the capacity of primary and secondary schools and deriving appropriate admission numbers from the capacity. The Council is required to set Pupil Admission Numbers (PAN) based on this methodology as part of its annual determination of admission arrangements for schools.

The Council holds up-to-date information relating to the capacities of each school, which is used to determine whether a surplus or deficit in available capacity exists. Where a development is likely to place pressure on the existing capacity of local schools, the Council will seek an agreed financial contribution towards the provision of additional school places or facilities.

It is necessary to retain some spare places to enable schools to cope with fluctuations in numbers of pupils in particular year groups. This allows for preference and demand volatility (e.g. year-on-year changes in the birth rate, parental choice etc.). The level of spare places needed to be retained at schools is unlikely to exceed 10%. Any school which has achieved 90% occupancy would be regarded as having no surplus capacity.

Although there are surplus places presently in some schools, there are other areas where there is an acute shortage of capacity. In some schools those surplus places may only be available in certain year groups so empty places in a school do not necessarily equate to there being sufficient capacity at that school.

The authority applies the recommended surplus in the Welsh Government's School Organisation Code. The application of applying 10% recommended surplus is prudent on two counts. Firstly, pupil population trends fluctuate. Secondly, Wrexham's School Admissions Policy works on a parental preference basis. The School Organisation Code states 'Some spare places are necessary to enable schools to cope with fluctuations in numbers of pupils'. A significant level of surplus provision is defined as '25% or more of a school's capacity (as defined in Circular 21/2021) and at least 30 unfilled places'. The application of 10% recommended surplus is therefore both fair and reasonable and is consistently applied in relation to all requests for developer contributions to reduce adverse impacts on, and risks to, Wrexham's educational infrastructure.

The School Organisation Code places onus on the local authority 'to manage excessive surplus places'. By applying a 10% deduction in capacity, the authority is exercising a reasonable level of caution in line with recommended guidance contained within the Code.

When seeking developer contributions, we comply with the 3 tests outlined below, as set out in CIL Regulations:

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

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Data

The Local Authority uses the latest available Pupil Level Annual School Census (PLASC) data and Admissions data to draw conclusions and recommendations in relation to school place planning. The applicant has used outdated My Local School Data 2022.

Nearest Distance

With regard to nearest distance, we give consideration to the two nearest English medium schools, the nearest Faith school and the nearest Welsh medium school in both primary and secondary sectors, in line with our admissions criteria of 'nearest suitable school'. We do not apply straight line distance as a criteria, as this would contravene the Welsh Government's School Admissions Code (2013), page 15, section 2.48 "Distance between home and school" which clearly states that reference to 'straight line' and 'how the crow flies' should not be used as a measure of distance. Nearest schools are assessed by safe walking routes rather than a straight line distance. For secondary schools, consideration is given to the safest walking distance of 3 miles of the development. For primary schools, consideration is given to the safest walking distance of 2 miles of the development. The authority uses walking distance to determine eligibility for transport. Nearest distance is used for school place planning in line with the Welsh Government's School Admissions Code.

Additional Learning Needs

The authority's 9-year capital investment plans include significant investment in specialist facilities for learners with Additional Learning Needs (ALN). All proposals must also consider how we plan for and can best meet the needs of all learners, including those with ALN.

Birth Rates and Fertility Rates

The authority recognises that across the UK birth rates and fertility rates have decreased, however the planning of pupil places is not solely dependent on these factors. It is not clear whether the Total Fertility Rate quoted by the applicant at paragraph 3.8 Education Issues Paper relates to England only or Wales only, or to both England and Wales.

A contribution towards the upgrading and/or extension of existing educational facilities will be sought by the Education Department, if the implementation of the development will result in the generation of additional primary or secondary pupil numbers in excess of existing or planned capacity at local schools. The Council will use the most recent school roll figures available.

It should be noted that empty places does not necessarily equate to there being sufficient capacity at that school. Investment may be needed to bring it up to the required standard to make it suitable for the number of pupils generated from the proposed development.

Local Demography

Since 2011, the population of Wrexham has remained broadly between 135,000-136,000 with fluctuations year on year in terms of increases and decreases. A presentation at a national Planning of School Places Meeting in May 2024 illustrated that demographic trends in Wales saw only two local authorities seeing an increase in population estimates, namely Newport and Wrexham.

The planning of school places and future education provision is a complex process, dependent on a number of contingencies and assumptions about population and pupil forecasting and local demographics, as well as planned housing developments. In certain areas of the city, demographic changes have been rapid, substantial and unpredictable. Shifting patterns give rise to a degree of uncertainty when planning education provision, and predicting future demand for school places continues to be challenging.

Department of Education Guidance

The Department for Education in England's guidance (Securing Developer Contributions for Education August 2023) referred to by the applicant is aimed at England only. The guidance is non-statutory, therefore:

- a) It is at the authority's discretion as to whether we follow the guidance.
- b) Equivalent guidance has not yet been published in Wales.

New Build Timescales

When planning long-term capital investment in the Education estate, the authority needs at least 3 years' notice. Our 9-year capital investment plan for Education cannot respond quickly to requirements. The public consultation, tender, business case and design and build process typically takes 3 years. We are therefore unable to slot in a new 420 pupil place school within short timescales.

Land Transfer

The gross site area needed for a 420 pupil place school is 17633 – 20050m² (Building Bulletin 99). The land transfer to WCBC must be triggered on first occupancy and a commitment from the developer that they will create an access road at the time of the land transfer.