
Project:	Land South of Patshull Road, Albrighton	Appeal Ref:	6007402
Title:	Education Response to Rep from Mr Patel	Document Ref:	
Originator:	Kerrie Norman	Date:	18/09/2026

1.0 Background

- 1.1 A Proof of Evidence in relation to education matters for the above development was submitted to the Inquiry, in line with the requirements for planning appeals.
- 1.2 Upon opening of the inquiry, a written statement has been submitted by Mr. Pank Patel, as a local resident. The statement focusses on matters of secondary education in the context of the evidence submitted to the inquiry and his view on the viability of a new secondary school.
- 1.3 I will respond to the substantive matters raised in Mr. Patel's written statement in this document.

2.0 Experience and Professional Standing

- 2.1 Mr. Patel states that he has viewed the Flinders Chase website and finds no evidence of "student pupil place planning".
- 2.2 He makes no reference to Section 1 of my Proof of Evidence which sets out my experience and qualifications in detail, nor to my experience that is publicly accessible via LinkedIn.
- 2.3 Section 1.0 of my Proof of Evidence is self-explanatory and factual in terms of the range of experience I have in pupil place planning, school organisation, estates strategies and the establishment of new schools over a 20 -year period. This includes major roles within a Local Authority (Liverpool City Council), UK Government (DfE), a leading Multi-Academy Trust (Ark Schools) and the private sector.
- 2.4 Paragraph 1.7 of my Proof of Evidence sets out some of the current commissions that I lead in developing Education Strategies and Delivery Plans for local authorities. This includes education demand modelling and school organisation for all early years, primary, secondary and post-16 in the Districts of Harborough and Oadby & Wigston in Leicestershire.

- 2.5 My Proof of Evidence also sets out my experience in establishing new schools and in roles within the Department for Education, a MAT, an advisor to an Academy Trust and in a consultancy/advisory role.
- 2.6 In understand from Mr Patel’s statement that his experience is in Senior Leadership for individual secondary schools and leadership development. He was also the Regional Schools Commissioner for the West Midlands for a two-year period, where his responsibilities would have included oversight of academies and input to the commissioning process for new Free Schools (academies).
- 2.7 I am satisfied that my experience in pupil place planning, education demand modelling and the establishment of new schools is extensive and enables me to fulfil the role of expert witness for this appeal.

3.0 New School Size

- 3.1 Mr. Patel refers to the DfE guidance note “Opening New Schools – Statutory Guidance for Proposers and Decision Makers” and states a view that he believes that this is the most important document, and it has been ignored. In his view this puts into question the validity of my Proof of Evidence.
- 3.2 Opening New Schools – statutory guidance for proposers and decision makers is new guidance published by the Department for Education in September 2026. It supersedes several previous guidance documents on the Free School Presumption process.
- 3.3 The document is clear that it is the responsibility of local authorities and proposers that they act in accordance with the relevant legislation and have regard to statutory guidance when seeking to open a new school. Section 2.0 of my Proof of Evidence already covers the legislative basis for establishing and operating schools and academies.
- 3.4 It is important to note that there is no statutory minimum size of school and nothing in legislation that affects the size of school.
- 3.5 The relevant section Mr Patel is referring to in the guidance note is on page 41, where it states:

*“Decision-makers should not make blanket assumptions that schools should be of a certain size to be good schools, although the viability and cost-effectiveness of a proposal is an important factor for consideration. The Department’s **expectations** on certain school sizes are as follows:*

Mainstream Primary: Minimum 2 forms of entry (420 capacity)

Mainstream Secondary (no sixth form): Minimum 4 forms of entry (600 capacity)”

- 3.6 These sizes are simply expectations and are not statutory requirements. The DfE frequently approves new schools that are below these sizes if they are shown to be viable. As Mr Patel will know from his experience in the role of RSC, it is for the Secretary of State for Education to decide whether to sign a Funding Agreement for a new Academy on the basis of evidence that they are provided with on viability, quality, demand and need.
- 3.7 The same guidance at page 44 references the need for financial viability to be demonstrated by identifying the Minimum Viable Number (MVN) of pupils for the school to be financially viable. This number can be very low and in my experience Funding Agreements have been signed for new secondary academies with as low as 38 pupils in the admission year. The Council and the successful operator would be required to prepare the Financial Plan to support a new school.
- 3.8 I strongly disagree with Mr Patel’s view that “a viable secondary school would require at least 1,000 pupils across the 11 to 16 age range”. If this were true, then up to half of all existing secondary schools and academies in England would be unviable.
- 3.9 Additionally, 173 of the 207 new free schools with secondary provision up to 2022 (83% of the new schools) were approved with less than 1,000 pupils of capacity.
- 3.10 My experience in working with local authorities and major housebuilders in shaping education infrastructure to support new communities is that smaller, expandable schools is the most suitable and sustainable solution. This prevents over-reliance on one or two schools that become very large, even if they agree to continual expansion, and long travel distances for young people.
- 3.11 The options that the Council would have available for different permutations of viable education provision are already set out in my Proof of Evidence. These are only likely to be possible if the Secondary School Land is provided.

4.0 Demand and Growth

- 4.1 Section 3.0 of my Proof of Evidence already covers secondary place demand and the impact of other housing developments.
- 4.2 Additional detailed information on the housing sites, planning references and locations of the developments to Albrighton and to Idsall School are within the appendices of the Proof of Evidence. I do not recognise Mr Patel’s statement that the evidence does not state where the developments are.

- 4.3** My analysis is conservative, as it only assesses developments within statutory travel distances and not the wider area over which pupils may travel in non-urban settings.
- 4.4** The Council has recently provided data on the number of students currently attending Idsall School who reside in Albrighton. The current number in 2025-26 was 236 students and this has risen since 2022.
- 4.5** With the additional housing growth approved, on likely site allocations and known pending speculative sites, this will generate significant additional secondary place demand to support secondary provision on more than one site in this part of the borough. This could only be facilitated with an additional Secondary School site being made available.

5.0 Expansion of Idsall School

- 5.1** These matters are already covered in detail in my Proof of Evidence and Rebuttal to Ms Reynolds' Proof of Evidence.
- 5.2** There is no evidence presented that The Marches Academy Trust supports or agrees with any expansion to Idsall School. Indeed, the current Head Teacher has publicly opposed expansion.
- 5.3** Mr Patel provides a view that he believes Idsall has a very large campus and could easily accommodate the growth. He provides no evidence to support this view.
- 5.4** I have delivered over fifty major education capital projects of all types and sizes and overseen the delivery of more than 1,400 new builds and major remodels of schools.
- 5.5** Expansions of the scale required at Idsall School would undoubtedly require building on land classed as playing fields, which is afforded additional protections and would require re-provision. There is no evidence or assuredness that this would be approved, even if supported by the school and The Marches Learning Trust.
- 5.6** The provision of the Secondary School Land at the Proposed Development makes prudent provision for education and offers a deliverable solution. I see no additional evidence presented by Mr Patel or the Council that Idsall School can viably accommodate the additional demand and that a new school site is unnecessary.