

Town and Country Planning Act 1990 Section 78 Appeal

by

Boningale Developments Limited

Against

**The non-determination of a planning application by
Shropshire Council for development at LAND AT
PATSHULL ROAD, ALBRIGHTON, SHROPSHIRE**

PINS Reference: 6007402

Shropshire Council Planning Reference: 24/02108/OUT

**Education Proof of Evidence of Kerrie Norman
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**Prepared on behalf of Boningale Developments
Limited**

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Ref: ALBST-FCL-GEN-FS-RP-X-002
Date: August 2026
Status: S5
Revision: P03

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1.0 INTRODUCTION AND SCOPE OF EVIDENCE

Introduction

- 1.1 My name is Kerrie Jayne Norman, and I am a Director of Flinders Chase, which is a specialist education and sport, construction project management and transport & highways consultancy. I am the Director for Capital Projects and responsible for all education and sport capital projects, education and sport assessments, education and sport strategies, estates strategies, and funding bid commissions for schemes throughout England and Wales.
- 1.2 I hold a Bachelor of Engineering with First Class Honours in Civil Engineering and a Master of Laws in International Business Law. I am currently switching professional institutions from the Institution of Civil Engineering (ICE) to the Royal Institution of Chartered Surveyors (RICS).
- 1.3 I have over 20 years' experience specialising in the delivery of education and sport capital projects, programme management and policy, as well as leading the delivery of major infrastructure schemes. My experience includes the direct delivery of over 50 major education capital projects and aligned sport and leisure schemes in roles of Project Director, Lead Technical Advisor and Lead Client Representative and programme management responsibility for national education capital programmes.
- 1.4 I was the Project Manager for the Building Schools for the Future programme for Liverpool City Council from 2005 to 2007 responsible for supporting school reorganisation, developing estates strategies and implementing full or partial rebuilds of nine secondary and SEN schools. From 2007 to 2012 I was a Programme Director at the Department for Education in London responsible for leading the £1.6 billion Primary Capital Programme, which involved overseeing the delivery of over 1,600 projects, and for Phase 1 of the £200 million University Technical Colleges programme. I was joint Programme Director for the £2.1 billion Sponsored Academies Programme and national ICT Capital Policy Lead for all academies. In 2010-11 I was seconded to a small specialist team, led by Sebastian James, for the independent

review of the £21 billion education capital programme. I was the workstream lead for Design and Procurement within the independent review team.

- 1.5 I established Flinders Chase in 2012 after leaving the UK Government and I lead a specialist team of 14 staff providing advice and delivery services to local authorities, developers, multi-academy trusts, sixth form colleges, further education colleges and universities on the development of education/leisure capital schemes, residential-led mixed-use schemes and major infrastructure projects.
- 1.6 These commissions span a wide geographic area from Hertfordshire to Lancashire and involve the review of education demand, pupil place planning, school organisation strategies, scoping education infrastructure and direct delivery of new schools. My specialist team provides advice to local authorities and developers on Section 106 planning obligations and planning appeals, including the preparation of expert witness evidence for public inquiries. My team also prepares technical briefings with guidance on the type and scale of facilities for residential-led masterplans, together with recommendations for education infrastructure which are realistic, sustainable and meet the obligations of CIL Regulations (Reg.122).
- 1.7 I am currently leading consultancy commissions for local authorities to develop the evidence base and infrastructure delivery plans for education to support their new Local Plans. I am leading a joint commission with three local authorities in Leicestershire that includes the preparation of an education demand model of all allocated and speculative housing sites over the plan period. The additional demand from new housing is then added to school-level birth and migration-led pupil forecasts to identify the scale, location and timing of new education infrastructure across the county. This will be used to guide planning obligations and the drafting of Section 106 Agreements across each local authority and ensure compliance with Regulation 122(2) of the CIL Regulations 2010.
- 1.8 I have senior experience in Central Government developing policy, experience leading the delivery of large-scale capital programmes, as well as delivery experience in the private sector. I have experience at multiple planning appeals and inquiries in the United Kingdom.

Background and Scope

1.9 This Proof of Evidence has been prepared in support of an appeal by Boningale Developments Limited ("the Appellant") against the non-determination of planning application 24/02108/OUT at Land at Patshull Road, Albrighton by Shropshire Council ("the Council").

1.10 The description of development is as follows:

"OUTLINE APPLICATION TO INCLUDE ACCESS FOR A MIXED-USE DEVELOPMENT COMPRISING UP TO 800 NO DWELLINGS, A CARE HOME OF UP TO 80 UNITS, A SECONDARY SCHOOL AND LOCAL CENTRE WITH ASSOCIATED ACCESS, INFRASTRUCTURE, LANDSCAPING AND DRAINAGE".

1.11 This is referred to as the 'Proposed Development' throughout my evidence.

1.12 I was instructed by the Appellant to review the evidence in relation to secondary age education provision and the justification for the reservation of a Secondary School site.

1.13 I understand that planning obligations relating to education have been agreed to be paid for via CIL, and this is confirmed in the Education Statement of Common Ground (CD 4.4).

1.14 I understand that SEND Transport is the subject of clauses within the Section 106 Agreement and that only the pupil yield methodology for the SEND pupil yield is not yet being agreed between the parties.

1.15 This Proof of Evidence examines the compliance of the pupil yield methodology with Regulation 122(2) of the CIL Regulations 2010 insofar as it affects the SEND transport contribution in the Section 106 Agreement.

1.16 I understand that the main area of disagreement between the Appellant and the Council in relation to education matters is the justification of a secondary school site, the ability of Idsall School to be able to accommodate pupils generated by the

Proposed Development and the planning weight to be attributed to the Secondary School site.

- 1.17 The purpose of my evidence is not to dispute that the Proposed Development will generate additional pupils or that additional pupil places need to be constructed to mitigate the effects of the Proposed Development.
- 1.18 Following the submission of the appeal for the Proposed Development, the Council resolved that, had it determined the application, planning permission would have been refused for two reasons. Neither of these reasons related to education or other community infrastructure.
- 1.19 I am satisfied that I can give evidence in support of the proposed development. The evidence that I have prepared and will provide for this appeal represents my true and professional opinions.

Methodology

- 1.20 In preparing this Proof, I have considered published demographic information, school capacity data, local authority policy documents and housebuilding activity (pre-planning, with consent and completed). I have also reviewed the Council's education consultation responses, the information prepared by the Appellant and the Council with their Statements of Case, relevant national and local planning policy, education legislation and guidance and publicly accessible information on recent and current planning applications for new housing, together with evidence considered in relevant planning appeals.
- 1.21 I have assessed the statutory obligations of the Council with regard to the provision of education for children and young people from age 4 to 19 and for young people with SEND up to age 25.
- 1.22 These responsibilities are assessed in the context of the responsibility of the Council to maintain an up-to-date evidence base that underpins future development and demonstrate deliverable infrastructure requirements.

1.23 My conclusions are based upon my assessment of the available evidence, demographic trends, school capacity, forecast pupil demand, likely levels of housebuilding activity and infrastructure requirements.

Structure of Evidence

1.24 My evidence considers the relevant national and local planning policy framework before examining the main issue of the justification for making provision for secondary school land.

1.25 My evidence assesses whether the provision of land for secondary education provision is necessary and whether it aligns with statutory and policy requirements.

1.26 I then set out a range of options for how the Council could utilise the school land to enable them to fulfil their statutory functions with necessary infrastructure in the future.

1.27 I examine the methodology applied by the Council in terms of SEND Education pupil yield, insofar as it affects the SEND Transport contribution in the Section 106 Agreement and whether this pupil yield methodology is compliant with Regulation 122(2) of the CIL Regulations 2010.

1.28 Finally, I summarise my conclusions on the necessity of the school land.

2.0 PLANNING POLICY CONTEXT

- 2.1 I will refer to national and local planning policy documentation that is relevant to education provision. This includes statutory requirements, adopted planning policy, emerging planning policy and non-statutory guidance relating to pupil place planning, education contributions and the physical requirements for the development of new school places.
- 2.2 This review cites relevant policy and paragraph numbers with direct reference to any matters relevant to the Proposed Development, but without repeating general details of the development and policy reviews covered by other Proofs of Evidence.

Legislative Framework

- 2.3 Section 14 (1) of the Education Act 1996 places a statutory requirement on local authorities to ensure sufficient school places are available in their area (known as the “sufficiency duty”).
- 2.4 Section 14 (3A) places a duty on local authorities to exercise their sufficiency duty with a view to securing diversity in the provision of school and increasing opportunities for parental choice.
- 2.5 Section 14 (6B) places responsibilities on local authorities to have regard to the need for securing that special education provision is made for pupils who have Special Educational Needs or Disabilities (SEND).
- 2.6 The Children and Families Act 2014 places a series of duties on local authorities in relation to children and young people who have special educational needs. Sections 27 (1) and (2) place statutory responsibilities on local authorities to ensure that education for children and young people with SEND is sufficient and to keep this under review.

- 2.7 Section 508A of the Education Act 1996 (as amended) places a duty on local authorities to promote sustainable travel and transport for learners of compulsory school age. In planning school provision, local authorities must have regard to the accessibility of schools, ensuring that the location and capacity of education infrastructure support sustainable travel patterns and reduces the need for unnecessary journeys.
- 2.8 Section 508B of the Education Act 1996 (as amended) places duties on local authorities to make travel arrangements for eligible children free of charge. Eligible children are those that live beyond statutory walking distances, those without a safe walking route and children with SEND or mobility difficulties.
- 2.9 The Town and Country Planning (Local Planning) (England) Regulations 2026 set out the detailed procedural requirements for local authorities in preparing local plans. Regulation 23 (5) sets out the scope of the proposed local plan and evidence required.
- 2.10 For education infrastructure, this means that education demand should be assessed for the whole of the plan period to identify the scope of education infrastructure likely to be required.

National Planning Policy Framework (NPPF)

- 2.11 The overarching purpose set out in the NPPF for the planning system is for it to contribute to the achievement of sustainable development, as articulated in paragraphs 8 to 11. This includes the provision of supporting infrastructure that can achieve the economic, social and environmental objectives of sustainable development.
- 2.12 Paragraph 100 sets out that it is important that a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities.

- 2.13 Local authorities should give **great weight** (my emphasis) to the need to create, expand or alter early years, schools and post-16 facilities through the preparation of plans and decisions on applications.
- 2.14 Local authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.

Securing Developer Contributions for Education – Department for Education (CD 18.1)

- 2.15 In 2019 the Department for Education (DfE) published a non-statutory guidance note for the first time called “Securing Developer Contributions for Education”. This guidance was updated in August 2023.
- 2.16 Paragraph 7 emphasises the importance of ensuring that the impacts of the development are adequately mitigated. This should consider education needs arising from the development and the capacity of existing schools serving the development (accounting for pupil migration across local authority boundaries).
- 2.17 Paragraph 74 highlights the need for local authorities to assess whether there will be enough capacity at the time the development is built and the need materialises. This should take into account other developments yet to be built.
- 2.18 An aligned guidance note, published by the Department for Education highlights that primary pupil yield does not tend to peak until six years after a development’s completion¹. Consequently, it will be around ten years post-completion before secondary pupil yield peaks.
- 2.19 Several sections of this guidance advise local authorities of the preference for new school places arising from housing development to be created in sustainable locations, accessible via active travel or public transport².

¹ Para 17, Estimating Pupil Yield from Housing Development, Department for Education, Aug 2023

² Para 46, Securing Developer Contributions for Education, Department for Education, Aug 2023

- 2.20 Paragraph 48 highlights that local authorities should carry out high level assessments of whether schools can expand and identify site options for new schools.
- 2.21 Paragraphs 53 and 54 highlight that local authorities are advised to ensure that sufficient land is secured and safeguarded for education and to consider 'futureproofing'.

3.0 SECONDARY EDUCATION DEMAND

Mainstream Pupil Yield

- 3.1 Shropshire Council does not appear to have a current, published SPD with up-to-date pupil yield factors. The Council has provided a consultee response (**CD 17.1**) with an estimated pupil yield for early years, primary, secondary, post-16 and SEND. This allows the factors that they have applied to be derived.
- 3.2 The Department for Education published a Pupil Yield Dashboard in 2023 and recommends that local authorities use the dashboard for estimating pupil yield from housing development, unless they have alternative, robust local evidence.
- 3.3 Local authorities are advised to ensure that pupil yield factors are refreshed every five years, using evidence from housing developments completed locally.
- 3.4 I note that the Council has changed their approach to calculating pupil yield for the Proposed Development since the planning decision was issued. In the Post-CMC Clarification Note issued by the Council dated 12/06/2026, the Council highlights an increase in their calculated pupil yield for secondary school pupils from 99 to 112.
- 3.5 The new approach of the Council in applying the DfE Pupil Yield Dashboard figures in place of their local pupil yield factors is accepted.

Impact of Other Development

- 3.6 It is critical that the impact of other housing development is considered when planning education infrastructure requirements. This ensures that local authorities are able to effectively discharge their statutory sufficiency duties in relation to school places (mainstream and SEND). It is also critical in facilitating sustainable development across geographic areas and for complying with Sections 508A and 508B of the Education Act 1996 with regards to school travel.

- 3.7 Planning policy requires local authorities to prepare an evidence base to support the implementation of local planning policy.
- 3.8 I am currently leading commissions with local authorities in preparing Education Strategies and Delivery Plans to support new Local Plans. This includes the development of Education Demand Models to assess likely additional pupil yield from allocated and speculative sites. This is then added to the birth and migration-led demographic forecasts for existing schools.
- 3.9 There is no publicly available information that indicates the Council have undertaken a similar education demand modelling exercise to develop the evidence base for the Local Plan that was previously submitted for examination.
- 3.10 No information has been submitted by the Council to show that any of the proposed site allocations, recently approved speculative development or pending applications for housing in this area of the borough have been modelled for their effects on education infrastructure.
- 3.11 If this exercise has not been undertaken by the Council, there is a significant risk that education infrastructure will be deficient, and they will not be able to secure suitable sites to discharge their responsibilities.
- 3.12 In the absence of pupil modelling for other developments within the zone of influence of Idsall School (the only secondary school in this part of the borough), we have modelled scenarios for pupil demand using publicly available information on planning applications and previously identified site allocations. The sites are listed in Appendix A.
- 3.13 A plan is provided in Appendix B with the statutory travel distances for secondary age pupils, the locations of existing secondary schools and the locations of potential housing development sites.
- 3.14 Table 1 below sets out the potential additional secondary and post-16 pupil yield for medium level and high development level scenarios of additional housing development within the zone of influence of Idsall School and the Proposed

Development site. The high development scenario includes all sites listed within Appendix A. The medium level scenario omits any applications on speculative sites that have been withdrawn but retains the site allocations from the withdrawn Local Plan.

Development Scenario	Number of Dwellings	Secondary Yield Factor	Secondary Yield	Post-16 Factor	Post-16 Yield	Total 11 to 18 Yield
Other devts (high)	2097	0.14	293.58	0.05	104.85	398.43
Other devts (medium)	2023		283.22		101.15	384.37
Land at Patshull Rd	800		112		40	152.00
High devt level additional cumulative demand (11 to 18)			550.43			
Medium devt level additional cumulative demand (11 to 18)			536.37			

Table 1: 11 to 18 Pupil Yield from Additional Housing Developments

- 3.15 There is a substantial level of additional housing planned in this part of Shropshire, which will undoubtedly affect the level of secondary school places that need to be commissioned. Further speculative developments may come forward and generate additional pupil yield.
- 3.16 Cumulatively the Proposed Development combined with other new housing likely to be developed in the area (as shown in Table 1) could generate demand for up to 550 additional places for 11 to 18 year olds.
- 3.17 The principle of additional school places needing to be constructed is clearly supported by the Council, as they have requested full contributions for all phases of education for this development. The Council is requesting similar mitigation from other planning applications in the area.
- 3.18 I find that the evidence on the level of known housing development shows a new school site will be required to facilitate a sustainable solution for organising 11 to 16 and post-16 provision in the east of the borough.

4.0 SECONDARY EDUCATION CAPACITY

Existing Capacity

- 4.1 There is no existing secondary school within three miles of Albrighton or the Proposed Development site.
- 4.2 Idsall School is the nearest secondary school in Shropshire, and it is approximately six miles from the Proposed Development site. Appendix B contains a map with the relevant locations.
- 4.3 Idsall School has a non-standard Published Admission Number for Year 7 of 216 pupils, which is just over seven forms of entry, and operates a sixth form.
- 4.4 There are discrepancies in the net capacity data with the Get Information About Schools (GIAS) database setting out a net capacity of 1,080 pupils and 1,172 pupils on roll. The Council has indicated a net capacity of 1,300 pupils in their Statement of Case³ (CD 3.2) and it has not been confirmed why this is different from the academy's self-reported data.
- 4.5 The most likely explanation is that the net capacity on GIAS is incorrect and omits the capacity associated with the school-based sixth form.
- 4.6 The data submitted by the Council for the 2025 School Capacity Return shows rising demand for Year 7 places in the Shifnall pupil planning area (which includes Idsall School) and a high point in 2030-31. This is without the effects of most of the additional housing likely to be developed from known applications and sites.
- 4.7 The most recent comments from the Council suggesting that Idsall School has capacity to accommodate secondary pupil yield are not supported by their pupil forecasts.

³ Paragraph 3.2, Statement of Case, Shropshire Council

- 4.8 The school leadership has recently publicly commented on other proposed housing schemes in Shifnall to say that Idsall School is oversubscribed and that they cannot absorb any additional secondary place demand⁴ and this is included in Appendix C.
- 4.9 As an academy, it is not within the Council's control to compel Idsall School to expand or to accept additional admissions above their PAN.
- 4.10 Table 2 uses the Council's figures for the net capacity of the Idsall School buildings and applies a 3% operational surplus to allow for in-year transfers and migration. The forecast number on roll is replicated from the Council's pupil forecasts for Idsall School. The cumulative pupil yield for 11 to 18 year olds is then applied to identify the deficit in pupil places.

Idsall School 11 to 18 Net Capacity	Capacity with 3% Operational Surplus	Council Forecasted Number on Roll	Residual Deficit with Housing Yield
1300	1261	1172	-461.43

Table 2: Idsall School Capacity and Development Impact

⁴ CD18-4 Giddings, A. (2026). Protest against plans for 500 homes. *BBC News*. [online] 16 July. Available at: <https://www.bbc.co.uk/news/articles/cn5nrq9yneqo> [Accessed 10 Aug. 2026].

Admission Patterns and Cross Border Movement

- 4.11 The admissions policy for Idsall School includes oversubscription criteria, which are applied if the school receives more applications for Year 7 than their PAN of 216. The oversubscription criteria prioritise applicants with EHCPs, looked after children, children living in the catchment, children of staff at the school, children with a sibling at the school and then straight-line distance.
- 4.12 The Council has indicated that Idsall School has a significant proportion of pupils who reside in neighbouring boroughs (e.g. Telford & Wrekin and Staffordshire)⁵. This is to be expected for a secondary school in a borough with rural characteristics, and which is near to the administrative border of other boroughs.
- 4.13 National guidance deals with this scenario by emphasising the need for local authorities with cross-border movement to cooperate with respect to pupil place planning. Paragraphs 83 and 84 of **CD 18.1** state that close collaboration is required.
- 4.14 It also explains that local authorities can invest in pupil places in adjoining local authority areas if they believe that the investment will improve quality and that solutions should be considered that benefit pupils on both sides of the border.
- 4.15 My view is that it is contrary to paragraph 100 of the NPPF and the national guidance set out by the DfE to use logical cross-border movement in a rural area as a means to suggest there is no need to expand secondary school places.
- 4.16 The first sentence of paragraph 100 is critical in stating that it is important that a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities.
- 4.17 The areas of Albrighton, Shifnal and eastern Shropshire are notable for the absence of any variation in the choice of secondary school places. There is only one secondary school in the administrative borough of Shropshire, Idsall School, and it is a non-faith, co-educational academy. A large-scale expansion of Idsall School, even if supported

⁵ Para 3.2, Statement of Case, Shropshire Council

by the Academy Trust, and if physically possible, would not provide any further choice of school and post-16 places.

- 4.18 The planned growth in new housing will give rise to a substantial number of additional secondary school and post-16 pupils. The Council's strategy in dismissing the need for Secondary School Land at the Proposed Development means that they are relying on the Academy Trust at Idsall School agreeing to expand by up to four forms of entry.
- 4.19 The Academy Trust has not indicated that they would be willing to expand. Even if they did agree to expand and secured such approval from the Secretary of State for Education, an expansion project of that scale would require significant building on land currently classed as playing fields. This triggers a series of other tests in terms of mitigations for playing field loss and may not be achievable.
- 4.20 The current Head Teacher has publicly indicated that she is not in favour of her school expanding and that the school was oversubscribed⁶. This directly contradicts the view of the Council in stating that their evaluation of current enrolment data, projected housing yields and regional demographics shows that existing secondary school infrastructure (Idsall School) has sufficient capacity to accommodate future growth⁷.
- 4.21 Paragraph 100 echoes the sufficiency duties of local authorities that are enshrined in Section 14 (1) of the Education Act 1996. Local authorities must ensure that there are enough early years, school and post-16 places.
- 4.22 Without agreement from the Academy Trust to expand by the scale needed to accommodate housing growth from allocated and speculative sites or a credible technical solution for achieving this on the Idsall School site, the Council's position that the Secondary School Land at the Proposed Development is not needed does not align with the requirements of Paragraph 100 in ensuring sufficient places.

⁶ CD18-4 Giddings, A. (2026). Protest against plans for 500 homes. *BBC News*. [online] 16 July. Available at: <https://www.bbc.co.uk/news/articles/cn5nrq9yneqo> [Accessed 10 Aug. 2026].

⁷ CD 1.25, Paragraph 3.1, Post-CMC Clarification Note, Shropshire Council, 12 June 2026

- 4.23 In turning to the issue of cross-border movement, the Council has stated that 32% of the current student body of Idsall School resides in Telford and Wrekin⁸. A Freedom of Information request has been made to access the underlying data, but this has not been provided at the time of writing this Proof of Evidence.
- 4.24 The Council's view appears to be that as catchment demand in Shropshire from new housing increases, these pupils in Telford and Wrekin would no longer be able to gain places at Idsall School.
- 4.25 The oversubscription criteria does prioritise children within the catchment area before applying criteria relating to children of staff, children attending feeder primary schools and then distance. However, Department for Education guidance emphasises the importance of local authorities collaborating over cross border movement and commissioning additional places that respond to need.
- 4.26 The effect of creating capacity by denying places to children who would attend Idsall School as it is close to their homes, albeit just over the administrative border, would potentially cause additional home to school transport and sufficiency issues for the neighbouring borough.
- 4.27 In considering all available data, my view is that Idsall School currently has limited available capacity to accommodate additional pupils from the Proposed Development and the most recent Council forecasts predict demand for Year 7 to be rising.
- 4.28 Additionally, Idsall School does not appear to have a realistic prospect of expanding on the current site to accommodate all likely housing within three miles of the school or in the east of the borough.
- 4.29 The nearest secondary school in neighbouring Telford and Wrekin is Holy Trinity Academy in Priorslee. The school is currently operating well over the stated net capacity of their buildings, so could not accommodate additional pupils without significant expansion and the capital funding to do so.

⁸ CD 1.25, Paragraph 3.2, Post-CMC Clarification Note, Shropshire Council, 12 June 2026

4.30 In considering the available information on the patterns of pupil movement in the secondary phase and limited capacity of Idsall School and Holy Trinity Academy to accommodate growth, my conclusion is that the provision of a Secondary School Site at the Proposed Development is necessary for the Council to enable the Council to develop a viable solution for secondary school place demand.

5.0 SCHOOL TRANSPORT

- 5.1 Secondary age pupils who are not offered a place at a mainstream secondary school within three miles safe walking distance of their home are entitled to free home to school transport.
- 5.2 All secondary school pupils who live in Albrighton will be eligible for free home to school transport, as Idsall School is the nearest secondary school in Shropshire and is six miles away.
- 5.3 The costs of providing school transport are rising with the Council reporting a total spend on all types of home to school transport of over £21 million per year across the borough⁹.
- 5.4 Home to school transport costs for children in Shropshire with SEND are very high at over £17 million per year and have driven Council budget overspends.
- 5.5 The provision of a school site for the development of secondary phase provision in Albrighton will significantly improve sustainable transport options for future residents of the Proposed Development, the existing community in Albrighton and other planned housing in this part of the borough.
- 5.6 National guidance emphasises the importance of providing schools within new settlements that allow for sustainable access and strike a balance between place-making objectives, education needs and parental preference.
- 5.7 My view is that the safeguarded site for new secondary provision within the Proposed Development will facilitate sustainable development and provide for a range of options that meet the objectives of the Council.
- 5.8 The Appellant has committed to providing a serviced secondary school site of a size that can accommodate a wide range of options for secondary education provision.

⁹ CD18-5, Appendix 1, Section 1.2, Budget Line RSA021, Financial Outturn 2024-25, Shropshire Council, June 2026 (Audit Committee)

- 5.9 It is agreed that the Proposed Development will not generate enough pupils to justify a new standalone mainstream secondary school, however no single development would generate demand for a secondary school on its own.
- 5.10 Secondary school sites are reserved within new residential-led developments to accommodate demand from cumulative planned housing development and to ensure Councils have viable options to continue to meet their statutory duties to provide sufficient school places. This does not compel the Council to develop a standalone secondary school on the site but gives them a deliverable option to do so.
- 5.11 The development of mainstream and/or SEND secondary phase provision on the Secondary School Site at any point in the future would reduce home to school transport costs for the Council.
- 5.12 My view is that there is no benefit to the Council or residents in the borough in the Council rejecting the offer of a Secondary School Site at the Proposed Development. It simply limits their options for future education provision in the borough and their ability to continue to meet their statutory obligations for sufficiency.

6.0 SEND EDUCATION

- 6.1 There is no state-funded specialist SEND school in this part of the borough. The nearest state-funded SEND school in Shropshire, the Severndale Specialist Academy, is over 19 miles away.
- 6.2 The Council recognises the need to construct additional SEND places to meet rising demand and to meet the additional demand that could be generated by the Proposed Development.
- 6.3 The most recently published SEND and Alternative Provision Strategy for Shropshire¹⁰ recognises the challenges with pupils accessing specialist provision that meets their needs.
- 6.4 Additionally, the Education White Paper¹¹ sets out proposals for major reforms for specialist SEND provision. The proposals are designed to strengthen specialist SEND school provision and to create Inclusion Bases within or adjacent to mainstream schools.
- 6.5 The provision of a safeguarded secondary school site will provide essential flexibility for the Council to develop a SEND facilities strategy that can deliver the proposals in the White Paper.
- 6.6 Options available to the Council could include the development of a new SEND specialist facility or the remodelling of Idsall School to enable construction of an Inclusion Base with a new secondary school in Albrighton relocating some Year 7 to Year 11 capacity closer to the homes of pupils.

¹⁰ Shropshire SEND and Alternative Provision (AP) Strategy 2024-2029, Shropshire Council

¹¹ Every child achieving and thriving (HTML version) - GOV.UK. (2026). [online] *Www.gov.uk*. Available at: <https://www.gov.uk/government/publications/every-child-achieving-and-thriving/every-child-achieving-and-thriving-html-version> [Accessed 10 Aug. 2026].

7.0 MERITS OF A SECONDARY SCHOOL SITE

- 7.1 In my experience, it is exceptionally rare for a serviced secondary school site to be offered by a housing developer. It is difficult for local authorities and for Central Government to assemble and acquire suitable sites for secondary schools.
- 7.2 I have led the delivery of over forty new secondary schools across England and managed capital programmes that included the delivery of hundreds of new and replacement secondary schools and academies. The physical size of the school sites required is significant and schemes must be planned at least five years in advance of need.
- 7.3 I am currently leading commissions that are scoping education infrastructure for New Towns and Garden Villages across England. I agree that it is challenging to develop standalone new secondary schools that are financially viable without high levels of new housing being developed.
- 7.4 The education infrastructure solutions to facilitate ongoing incremental housing growth include more flexible arrangements for long term provision. This can include expansion of post-16 provision on one site and balancing the size of Year 7 to Year 11 provision between two secondary phase sites. The safeguarded secondary school site provides the ability for these options to be progressed and delivered.
- 7.5 Other innovative solutions that could deliver the objectives of the Council and create a high-quality, sustainable community could involve the creation of new SEND specialist school capacity or a combination of an Inclusion Base with mainstream secondary provision.
- 7.6 The most recently published Shropshire Infrastructure Funding Statement set out that at the end of 2025, the Council retained CIL receipts totalling £33.7 million. This amount is likely to grow substantially, as the pace of new development increases.
- 7.7 The Council has a range of options for funding the delivery of new secondary and SEND provision. They can access CIL monies, in addition to Basic Need Funding provided by the DfE (allocations are based on the need for new places).

- 7.8 The Council also has access to High Needs Capital Funding for the construction of new SEND schools and inclusion bases. This is a devolved funding allocation and the Council in Shropshire has received approximately £13.7m from 2021 to 2027 to construct additional high needs places.
- 7.9 The evidence of need and forecasted demand supports the conclusion that a secondary school site within the Proposed Development is required. It meets with all policy objectives for sustainable development and provides a valuable asset for the Council to develop an infrastructure solution for secondary provision.
- 7.10 If the Council rejects the serviced Secondary School Site and it is not reserved within the Proposed Development, it is unlikely that an alternative new serviced site will be able to be assembled by the Council in a suitable location.
- 7.11 In these circumstances, the Council would be solely reliant in the Academy Trust that runs Idsall School, The Marches Academy Trust, agreeing to large-scale expansion. It would also commit the Council to long-term increases in home to school transport costs.
- 7.12 My view is that this is a high-risk approach in terms of the Council complying with their statutory sufficiency duty and promoting sustainable development.
- 7.13 Travel distances would get longer and pupils who travel shorter distances but live over the border in Telford and Wrekin may also have to travel longer distances if they are no longer able to gain places at Idsall School.
- 7.14 If the Council refuses to accept the Secondary School Land offered this may mean that the Council is unable to meet their sufficiency duty in the future and/or has to acquire a new school site at considerable expense to the public purse.

8.0 SUMMARY AND CONCLUSIONS

- 8.1 There is agreement between the Appellant and the Council that the Proposed Development will generate additional demand for school places.
- 8.2 There is agreement between the Appellant and the Council on the scale of education contributions required to fund additional places that mitigate the effects of the Proposed Development.
- 8.3 There is disagreement on secondary school capacity that is forecast to be available for the Proposed Development. Based on the available evidence, I do not believe that the effects of likely additional housing development have been considered when assessing the education infrastructure requirements for this part of the borough.
- 8.4 Idsall School is the nearest secondary school to the Proposed Development and is over six miles away. My view is that the available data shows that the school will have limited to no capacity to be able to accommodate additional demand from the Proposed Development or for large-scale expansion.
- 8.5 Housing developments in the area could generate around 550 additional pupils aged 11 to 18 that would be seeking places at Idsall School. Whilst there is likely to be a small amount of available places when demand materialises from these developments, I do not consider it realistic for this level of additional demand to be met on the Idsall School site.
- 8.6 My view is that any cross-border movement of pupils is not materially relevant to whether additional secondary place capacity is required, given the rurality of the area and the location of the existing school site. National guidance promotes collaborative solutions between neighbouring boroughs with respect to school place planning and new housing.
- 8.7 The secondary school site within the Proposed Development is a highly significant and valuable asset for the Council to be able to develop innovative solutions for mainstream and SEND provision. This will significantly contribute to creating sustainable communities and high-quality placemaking objectives, as well as enabling

the Council to fulfil their sufficiency duty and potentially reduce home to school transport costs.

- 8.8 The Council has access to a range of capital funding sources including CIL receipts, Basic Need Funding and their High Needs Provision Capital Allocation. These sources can be used to deliver an education infrastructure solution on the Secondary School Land that will meet the needs of existing and future communities, improve sustainable transport options and meet their sufficiency duties.