Hertfordshire County Council: 3231447OUT, Land East of the A10 Position Report

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1.0 Statement Summary

1.1 The Hertfordshire Pupil Yield Study (PYS) is the county council's longitudinal investigation into pupil yield generation across Hertfordshire. Results of the PYS are used to inform both the county council's approach to strategic education planning, and its Section 106 charging mechanism for education through the Hertfordshire Demographic Model (HDM).

1.2 On the 9th of August 2023, the Department for Education (DfE) published non-statutory guidance for local authorities to support requests for developer contributions, alongside several pupil product ratios (PPR) produced as part of a national investigation on pupil yield generation.

1.3 Both studies derive pupil yield figures by matching residential addresses to school census records, though variations in the duration of study and subsequent interpretation of data, contribute towards different results when projecting pupil yield from new developments.

1.4 Section 4.0 of this report provides a comparison of how the HDM has projected the yield which may arise from 3231447OUT, Land East of the A10 relative to the DfE PPRs. There are minor differences in yield projections, however these are not considered significant or detrimental.

1.5 Acknowledging that the DfE PPRs are structured for two-tier education systems only, the county council seeks further confirmation from EFM justifying their analytical approach to manipulating PPR yields. The county council questions whether assuming a uniform yield generation may be underestimating yield in EFMs analysis, compounded by the lack of peak yield data in the DfE's own dataset.

1.6 The county council maintains that the HDM, through the calibration of results against the PYS, has responded to the passage of time, with additional analytical capabilities allowing for the identification of long-term and temporary yield demand, which the county council then considers when determining contributions sought. It is not possible to identify long-term or short-term demand from the DfE PPRs as applied by EFM, and no further information has been provided on how EFM therefore propose charging for PPR yields.

1.7 The county council maintains its corporately agreed position to continue monitoring Hertfordshire pupil yields through the PYS, with the interpretation of results influencing the HDM as opposed to the using the DfE PPRs. This position is supported by the DfE who recommend that local education planning authorities develop their own datasets, and is stated explicitly in Paragraph 5 of the DfE's guidance on Estimating Pupil Yield from Housing Developments which reads:

> "The use of [Department for Education] data is voluntary and [local authorities] can continue to rely solely on local pupil yield evidence if this is considered appropriate, for instance due to the local authority holding more detailed and representative data over a longer period, or

[local authority] data showing significant recent deviation from historic trends."[1]

2.0 Hertfordshire Pupil Yield Study and Education Charging Mechanism

2.1 The Department for Education (DfE) recognise in their guidance on Estimating Pupil Yield from Housing Developments that "some local authorities […] already have substantial pupil yield data of their own"[2]. As the education planning authority for Hertfordshire, the county council has been conducting its own longitudinal investigation into the pupil yield arising from Hertfordshire developments since 2019 known as the Pupil Yield Study (PYS).

2.2 When determining the yield arising from studied developments, the PYS follows a comparable method to that which has been employed by the DfE, whereby pupil yield is identified through matching residential addresses to school census records.

2.3 However, subsequent differences in the study period of each investigation, as well as the way both group developments to monitor yield over time, with the PYS employing discrete completion-based cohorts in comparison to the total cumulative units used by the DfE, result in different yield projections.

2.4 Further information on the PYS is available online: PUPIL YIELD METHODOLOGY (hertfordshire.gov.uk)

2.5 Results from the PYS are used to inform both the county council's approach to strategic education planning and its Section 106 charging mechanism for education through the Hertfordshire Demographic Model (HDM), which has been in use since 2021 and the adoption of the county council's Guide to Developer Infrastructure Contributions.

2.6 The HDM is the county council's agreed method for calculating developer contributions for mainstream and SEND education services, with the model projecting the average school-aged populace likely to arise from a development.

2.7 For model inputs, developers are asked to provide as much information as possible regarding the proposed development, including development mix by type, tenure, and bed size as well as the trajectory of planned completions per annum.

2.8 Developed prior to the 2021 Census, the HDM uses customised output tables from the 2011 Census to provide baseline population data. Functions are then incorporated into the HDM to adjust projected yields in line with observed yields from the PYS. This allows for the consideration of changing demographic trends beyond the 2011 baseline, with the PYS study period

[1] Paragraph 5, Department for Education: Estimating Pupil Yield from Housing Developments (2023)
[2] Paragraph 24, Department for Education: Estimating Pupil Yield from Housing Developments (2023).

extending from 2002 to 2022 at present, an additional 11-years of monitoring beyond the census baseline.

2.9 Further information on the functionality of the HDM is available online through the county council's Guide to the Hertfordshire Demographic Model, including how results of the HDM are calibrated against findings of the PYS.

3.0 Use of the Hertfordshire Demographic for 3231447OUT, Land East of the A10

3.1 DfE guidance is clear that "where local authorities have robust local evidence of different pupil yields than those shown in DfE's data, these yields can be used instead of [DfE] pupil yield data"[3], and that "the use of [DfE] data is voluntary and [local authorities] can continue to rely solely on local pupil yield evidence if this is considered appropriate."[4]

3.2 Robustness is further defined by the DfE as:

> "[…] The department considers local evidence of different pupil yields to be robust if it is transparent, based on a representative sample of housing developments, clearly explained and well-reasoned. When pupil yield evidence has been tested and validated through a local plan or CIL Charging Schedule examination, planning appeal, or Judicial Review, it should be accepted without further challenge unless there has been a significant material change in circumstances since that time."[5]

3.3 The county council considers the PYS and its resultant applications to be an appropriate and robust source of pupil yield data for Hertfordshire, and that DfE guidance is clear in its support for localised evidence bases. To determine the contributions to be sought from 3231447OUT, Land East of the A10, the application was therefore modelled in HDM.

3.4 The proposed dwelling mix for 3231447OUT, Land East of the A10 as modelled in the HDM is shown in **Table 1** below.

[3] Paragraph 13, Department for Education: Estimating Pupil Yield from Housing Developments (2023).
[4] Paragraph 5, Department for Education: Estimating Pupil Yield from Housing Developments (2023)
[5] Paragraph 13, Department for Education: Estimating Pupil Yield from Housing Developments (2023).

Table 1: Dwelling mix by bed-size, type and tenure proposed for 3231447OUT, Land East of the A10.

Type	Tenure	Bed-Size	Units
Flat	Affordable	1	21
Flat	Market	1	7
House	Affordable	1	0
House	Market	1	0
Flat	Affordable	2	14
Flat	Market	2	15
House	Affordable	2	28
House	Market	2	40
Flat	Affordable	3	0
Flat	Market	3	0
House	Affordable	3	33
House	Market	3	134
Flat	Market	4	0
House	Affordable	4	9
House	Market	4	49

3.5 The county council anticipate that a development with these characteristics may yield on average:

- 127 pupils requiring a place in a First phase school.
- 97 pupils requiring a place in a Middle phase school; and
- 73 pupils requiring a place in an Upper phase school.

3.6 The HDM projected yield for all phases is shown in **Table 2** below.

Table 2: Anticipated pupil yield (rounded) of 3231447OUT, Land East of the A10, as projected by the HDM (V8.6).

Phase	HDM Projected Pupil Yield
First	127
Middle	97
Upper	73
Nursery	23
Post-16	29
SEND Primary (First)	2
SEND Secondary (Upper)	2

4.0 Department for Education Pupil Product Ratios.

4.1 Published in August 2023, the DfE provides Pupil Product Ratios (PPRs) for local planning authorities in England by unit type, tenure and bed-size, which may be used to estimate the pupil yield generated from new developments.

4.2 At present there is no confirmation from the DfE on whether they will be maintaining the dataset behind each PPR, and no new data has been published beyond the 2021/22 academic year. Instead, local education planning authorities are actively encouraged to "continue building on the DfE analysis by creating [their] own pupil yield data"[6], as well as to "supplement"[7] or "update [DfE pupil yield factors] over time[8]".

4.3 Covering a shorter period that the county council's PYS, the DfE study population includes developments that have ten or more dwellings, which were started and completed between 2008 and 2022, making 2021/22 the latest academic year for which PPRs are available for most phases.

4.4 The DfE also note that the "data time period [behind the PPRs of 2008 to 2022] is not long enough to show the peak"[9] for Secondary phase yields, and as such PPR for Secondary phases may be under representative of actual yield, further justifying why "[local education planning authorities are encouraged] to publish new equivalent pupil yield data".[10]

Pupil Product Ratios for Hertfordshire

4.5 3231447OUT, Land East of the A10 is located within an area where pupils generated by the development requiring mainstream education will enter a three-tier education system of First, Middle and Upper schools.

4.6 The DfE does not provide specific PPRs for First, Middle or Upper phases. As such, Primary PPRs have been used by EFM to represent First, and Secondary PPRs have been used to represent Upper.

4.7 PPRs used by the county council for purposes of comparison and rebuttal only are as outlined in **Table 3**. Where a PPR was not available for a specific bed-size, the PPRs used have been indicated, predominantly affecting units with four or more bedrooms, where a 'Number of Bedrooms 3+' or 'Number of Bedrooms 4+' PPR had to be used.

4.8 The county council also note that EFM did not identify Post-16 PPRs, stating 'Post-16 - not showing on web' in their analysis. The DfE Pupil Yield Dashboard, providing the public facing user-interface for DfE's data, states that users must 'Select 2020/21 or earlier for Post-16 Yields'. The PPRs for Post-16 presented in **Table 3**, are for the academic year 2020/21, representing the latest year where this information is available.

[6] Paragraph 24, Estimating Pupil Yield from Housing Development. Department for Education (2023)
[7] Paragraph 5, Estimating Pupil Yield from Housing Development. Department for Education (2023).
[8] Main Points, Estimating Pupil Yield from Housing Development. Department for Education (2023).
[9] Pupil Yield Data Dashboard: Technical Notes, Department for Education (2023)
[10] Paragraph 24, Estimating Pupil Yield from Housing Development. Department for Education (2023)

4.9 For Middle PPRs, the county council has taken an average of the PPRs for Primary and Secondary per unit type, tenure, and bed-size. This approach is different to that used by EFM when estimating Middle yield, which is discussed further in Section 5.0.

Table 3: Department for Education Pupil Product Ratios for Hertfordshire by phase and unit bed-size, type and tenure.

Type	Tenure	Bed-Size	Phase	PPR	Academic Year	Note
Flats	Affordable	1	First	0.036506	2021/22	
Flats	Affordable	2	First	0.267032	2021/22	
Flats	Affordable	3	First	0.378049	2021/22	
Flats	Affordable	4	First	0.378049	2021/22	PPR 3+
Houses	Affordable	1	First	0.076923	2021/22	
Houses	Affordable	2	First	0.579137	2021/22	
Houses	Affordable	3	First	0.652744	2021/22	
Houses	Affordable	4	First	0.652744	2021/22	PPR 3+
Flats	Market	1	First	0.025498	2021/22	
Flats	Market	2	First	0.114364	2021/22	
Flats	Market	3	First	0.20442	2021/22	
Flats	Market	4	First	0.085106	2021/22	PPR 4+
Houses	Market	1	First	0.166667	2021/22	
Houses	Market	2	First	0.271328	2021/22	
Houses	Market	3	First	0.36574	2021/22	
Houses	Market	4	First	0.393007	2021/22	PPR 4+
Flats	Affordable	1	Early Years	0.028651	2021/22	
Flats	Affordable	2	Early Years	0.099809	2021/22	
Houses	Affordable	1	Early Years	0.125847	2021/22	ALL (No 1 bed PPR)
Houses	Affordable	2	Early Years	0.170264	2021/22	
Flats	Affordable	3	Early Years	0.058824	2021/22	
Flats	Affordable	4	Early Years	0.058824	2021/22	PPR 3+
Houses	Affordable	3	Early Years	0.097461	2021/22	
Houses	Affordable	4	Early Years	0.097461	2021/22	PPR 3+
Flats	Market	1	Early Years	0.015671	2021/22	
Flats	Market	2	Early Years	0.04477	2021/22	
Houses	Market	1	Early Years	0.166667	2021/22	

Houses	Market	2	Early Years	0.071199	2021/22	
Flats	Market	3	Early Years	0.096154	2021/22	
Houses	Market	3	Early Years	0.091248	2021/22	
Houses	Market	4	Early Years	0.074825	2021/22	PPR 4+
Flats	Market	4	Early Years	0.021277	2021/22	PPR 4+
Flats	Affordable	1	Middle	0.024243	2021/22	
Flats	Market	1	Middle	0.01675	2021/22	
Houses	Market	1	Middle	0.166667	2021/22	
Houses	Affordable	1	Middle	0.076923	2021/22	
Flats	Affordable	2	Middle	0.171868	2021/22	
Flats	Market	2	Middle	0.080499	2021/22	
Houses	Market	2	Middle	0.168056	2021/22	
Houses	Affordable	2	Middle	0.386091	2021/22	
Flats	Affordable	3	Middle	0.317073	2021/22	
Flats	Market	3	Middle	0.186061	2021/22	
Houses	Market	3	Middle	0.262269	2021/22	
Houses	Affordable	3	Middle	0.587633	2021/22	
Flats	Market	4	Middle	0.074468	2021/22	
Houses	Market	4	Middle	0.316783	2021/22	
Houses	Affordable	4	Middle	0.587633	2021/22	
Flats	Affordable	4	Middle	0.317073	2021/22	
Flats	Affordable	1	Upper	0.011979	2021/22	
Flats	Market	1	Upper	0.008003	2021/22	
Houses	Market	1	Upper	0.166667	2021/22	
Houses	Affordable	1	Upper	0.076923	2021/22	
Flats	Affordable	2	Upper	0.076703	2021/22	
Flats	Market	2	Upper	0.046635	2021/22	
Houses	Market	2	Upper	0.064785	2021/22	
Houses	Affordable	2	Upper	0.193046	2021/22	
Flats	Affordable	3	Upper	0.256098	2021/22	
Flats	Market	3	Upper	0.167702	2021/22	

Houses	Market	3	Upper	0.158798	2021/22	
Houses	Affordable	3	Upper	0.522523	2021/22	
Flats	Market	4	Upper	0.06383	2021/22	PPR 4+
Houses	Market	4	Upper	0.240559	2021/22	PPR 4+
Houses	Affordable	4	Upper	0.522523	2021/22	PPR 3+
Flats	Affordable	4	Upper	0.256098	2021/22	PPR 3+
Flats	Affordable	1	Post-16	0.006207	2020/21	
Flats	Affordable	2	Post-16	0.023766	2020/21	
Houses	Affordable	1	Post-16	0.076923	2020/21	
Houses	Affordable	2	Post-16	0.040951	2020/21	
Flats	Affordable	3	Post-16	0.161765	2020/21	
Flats	Affordable	4	Post-16	0.161765	2020/21	PPR 3+
Houses	Affordable	3	Post-16	0.212522	2020/21	
Houses	Affordable	4	Post-16	0.212522	2020/21	PPR 3+
Flats	Market	1	Post-16	0.003667	2020/21	
Flats	Market	2	Post-16	0.013974	2020/21	
Houses	Market	1	Post-16	0.083333	2020/21	
Houses	Market	2	Post-16	0.014134	2020/21	
Flats	Market	3	Post-16	0.071429	2020/21	
Houses	Market	3	Post-16	0.035924	2020/21	
Houses	Market	4	Post-16	0.078041	2020/21	PPR 4+
Flats	Market	4	Post-16	0.042553	2020/21	PPR 4+
Flats	Affordable	1	SEND	0.013793	2021/22	
Flats	Affordable	2	SEND	0.006908	2021/22	
Flats	Affordable	3	SEND	0.006908	2021/22	PPR 2+
Flats	Affordable	4	SEND	0.006908	2021/22	PPR 2+
Flats	Market	1	SEND	0.006383	2021/22	
Flats	Market	2	SEND	0.004389	2021/22	
Flats	Market	3	SEND	0.036145	2021/22	
Flats	Market	4	SEND	0.042553	2021/22	PPR 4+
Houses	Affordable	1	SEND	0.076923	2021/22	

Houses	Affordable	2	SEND	0.021583	2021/22	
Houses	Affordable	3	SEND	0.04914	2021/22	
Houses	Affordable	4	SEND	0.04914	2021/22	PPR 3+
Houses	Market	1	SEND	0.083333	2021/22	
Houses	Market	2	SEND	0.003529	2021/22	
Houses	Market	3	SEND	0.009517	2021/22	
Houses	Market	4	SEND	0.012792	2021/22	PPR 4+

5.0 Application of Department for Education Pupil Product Ratios for 3231447OUT, Land East of A10.

5.1 Reiterating paragraph 3.3, the county council considers the PYS and its resultant applications to be an appropriate and robust source of pupil yield data for Hertfordshire, and that DFE guidance evidently supports the implementation of local data.

5.2 The county council does not use the DfE PPRs when projecting the anticipated yield which may be generated from a development or in its resultant approach to Section 106 charging. The county council's position on the application of the HDM is published in our Guide to Developer Infrastructure Contributions.

5.3 However, for this comparison and rebuttal, the county council has considered how the HDM and DfE PPR estimate yield for 3231447OUT, Land East of the A10 respectively.

Mainstream Education Yield

5.4 PPRs provided by the DfE are per academic year and are created by dividing the cumulative number of pupils by the cumulative number of completed properties, for each applicable unit type, tenure, and bed-size combination.

5.5 The county council has multiplied the number of units by bed-size, type and tenure proposed at 3231447OUT, Land East of the A10 (shown in **Table 1**), against the PPRs from **Table 3**.

5.6 For mainstream education and associated sub-phases, the yield projected by the HDM in comparison to the the multiplication of units against DfE PPRs is shown in **Table 4** below.

Table 4: Estimated DfE PPR Yield and Projected HDM Yield for mainstream education at 3231447OUT, Land East of the A10, rounded to the nearest whole number.

Phase	Estimated DfE Pupil Yield	Projected HDM Pupil Yield
First (Primary)	129	127
Nursery	30	23
Middle	97	97
Upper (Secondary)	65	73
Post-16	20	29
Total	**342**	**349**

5.7 It is recognised that estimated DfE yields shown in **Table 4** double count the final two years of Primary and first two years of Secondary yield which forms the Middle phase. Nevertheless, it should be recognised that the calibration of the HDM using PYS data has produced results which are not significantly different between approaches for multiple phases. The HDM projects a lower yield for nursery than the DfE PPRs, whilst marginally higher yields for Upper and Post-16 phases likely reflect the longer study period of the PYS,

monitoring education phases over more time, and that DfE data has not yet peaked.

5.8 By producing comparable yields, **Table 4** above shows how the calibration of the HDM using PYS data up, for which the latest data available covers yields generated up to 2022, allows for the HDM to consider demographic changes over time beyond the 2011 census baseline.

SEND Education

5.9 The county council seeks SEND contributions for Primary and Secondary provision only, equivalent to First and Upper within the context of 3231447OUT, Land East of the A10.

5.10 When multiplied against the number of units proposed by bed-size, type and tenure, the SEND yield projected using DfE PPRs (**Table 3**) is equivalent to 5 pupils per phase as outlined in **Table 5** below.

Table 5: Estimated DfE PPR Yield and Projected HDM Yield for SEND education at 3231447OUT, Land East of the A10, rounded to the nearest whole number.

Phase	Estimated DfE Pupil Yield	Projected HDM Pupil Yield
SEND Primary (First)	5	2
SEND Secondary (Upper)	5	2
Total	**10**	**4**

6.0 EFM Adjustment of Department for Education Pupil Product Ratios and Middle Estimates.

6.1 As noted, PPRs provided by the DfE are "[calculated by] dividing the number of pupils by the number of completed properties, for each applicable breakdown combination. Within these yield factors, a pupil is counted for every year that they live in a new build development."[11]. A sample of this principle is shown in **Table 6** below, displaying the DfE PPRs for Primary education in Hertfordshire for 3-bed market houses, identified as the most common unit type at 3231447OUT, Land East of the A10.

Table 6: Department for Education Pupil Product Ratio background data for Primary education for all units between 2019/20 and 2021/22.

Academic Year	Phase	Tenure	Type	Bed-size	No. of pupils	No. completed Units	Pupil Yield
2019/20	Primary	Market	Houses	3	1578	4562	0.345900921
2020/21	Primary	Market	Houses	3	1748	4927	0.354779785
2021/22	Primary	Market	Houses	3	1960	5359	0.365739877

6.2 To generate yields for both First and Upper education phases, EFM have divided the estimated yield resulting from the use of DfE PPRs for Primary and Secondary, by the number of year groups per two-tier system phase, multiplied by the number of year groups per three-tier system phase. For First yields, this process is shown in **Equation 1** below.

Equation 1: EFM PPR Yield Adjustments to create First education.

$$129.15 \div 7 = 18.45$$
$$18.45 \times 5 = 92.25$$

6.3 For Middle phase education, EFM have divided DfE yields from Primary and Secondary PPRs by the number of year groups per two-tier system phase as before, multiplied the result by the number of year groups per three-tier system phase, and added the two results together. This process is shown in **Equation 2** below.

Equation 2: EFM PPR yield adjustments to create Middle education.

$$\big((129.15 \div 7) \times 2\big) + ((65.09 \div 5) \times 2 = 62.94$$

6.4 Following this approach, EFM has estimated a rounded pupil yield of:

- 92 pupils requiring a place in a First phase school.
- 63 pupils requiring a place in a Middle phase school; and
- 39 pupils requiring a place in an Upper phase school.

6.5 However, as evidenced in **Table 6** above, though it may be seen that 212 additional pupils were observed from 432 new 3-bed market houses between

[11] Department for Education: Pupil Yield Data Dashboard Technical Notes. DfE, 2023.

2020/21 and 2021/22, it is not possible to tell the age distribution of those pupils and to which year group they were within.

6.6 Instead, it is only possible to tell the cumulative total yield, and whilst "housing development will generate pupils across all age groups [it is] not necessarily in numbers matching standard class sizes"[12], inferring that housing can generate disproportionate pupil yield and thus demand in certain year groups, with the DfE also recognising that "new housing tends to attract more young families […], yielding higher numbers of pupils particularly in the pre-school and primary age groups"[13].

6.7 As such, it may be inappropriate to assume that 3231447OUT, Land East of the A10 will generate pupil yield evenly across all year groups, particularly in the short-term. The DfE reference the use of "applying the relevant pupil yield factors proportionally"[14] in the context of Middle education, but no evidence has been provided by EFM or the DfE as to what proportional in the context of yield resulting from DfE PPRs is.

6.8 Dividing estimated DfE PPR yields by seven for Primary and by five for Secondary to generate a yield per year group, may erroneously mask that new developments can generate higher pupil yields within certain age groups, resulting in a subsequent underestimation of yield.

6.9 It is the county council's position that the onus must be placed on EFM to provide evidence that age-profile of yield generation for developments studied by the DfE for Hertfordshire, is such that it supports their uniform approach in manipulating DfE's PPRs.

[12] Paragraph 18, Estimating Pupil Yield from Housing Development. Department for Education, 2023.
[13] Paragraph 67, Securing Developer Contributions for Education. Department for Education, 2023.
[14] Footnote 10, Paragraph 15, Estimating Pupil Yield from Housing Development. Department for Education, 2023.

7.0 Short-term and Long-term demand

7.1 Guidance from the DfE refers to the use of temporary infrastructure as "appropriate in the case of short-term peaks that only briefly exceed the longer-term average pupil yield"[15], yet no exact reference is made as to how local authorities should determine what proportion of the yield projected from DfE PPRs is likely short-term versus more sustained long-term demand, with DfE's technical notes stating that each PPRs are "the [cumulative] number of pupils by the [cumulative] number of completed properties for each applicable breakdown combination"[16],masking temporal trends.

7.2 Therefore, alongside the absence of evidence that EFM have considered appropriate proportionality in their worked yields, following the assumption that yield generation is uniform across all age groups, it is also not possible to tell what proportion of yield resulting from DfE PPRs, engineered or otherwise, is anticipated to be only a temporary short-term demand, versus long-term continued demand.

Demand in the Hertfordshire Demographic Model

7.3 Within the HDM, the use of trajectory data and calibration of results against findings of the PYS, which longitudinally studies pupil yield within discrete completion-based cohorts, allows the county council to anticipate how pupil yield changes over time.

7.4 The county council's Guide to Developer Contributions is accompanied by Technical Appendix 3: Mainstream Education, which outlines that:

> "The Hertfordshire model allows the pupil yield projection to change with time, as children grow older and age into different school phases and, in the longer term, the development starts to conform to an age structure in line with mature housing stock in the wider community. The result is often a peak in demand in the medium term as, for example, pre-school children age into the primary phase. The county council seeks contributions which reflect this change over time and recognise that an element of 'temporary' provision may be needed to meet peaks in demand."[17]

7.5 **Table 7** below shows the permanent demand duration for First, Middle and Uppers schools at a period of 5, 4 and 3-years respectively, representing the lifetime of one cohort in each phase. Any projected yield which is anticipated to be required for less than the timeframes outlined in **Table 7** is identified as temporary demand.

[15] Paragraph 18, Estimating Pupil Yield from Housing Development, DfE 2023.
[16] DfE Pupil Yield Dashboard: Technical Notes. DfE 2023.
[17] Paragraph 2.3, Technical Appendix 3 – Education (Mainstream Schools), HCC, 2023.

Table 7: Permanent demand timeframes for First, Middle and Upper schools in the HDM, representing the lifetime of one cohort in each phase respectively.

Phase	Cohort Lifetime (Years)
First	5
Middle	4
Upper	3

8.0 Section 106 Contribution Requests

8.1 The county council is seeking contributions from 3231447OUT, Land East of the A10 towards:

- A new 2FE First school, including nursery provision.
- The expansion of a 1FE Middle school.
- The expansion of a 1FE Upper school, including post-16 provision

8.2 Guidance from the DfE advises that "the assumed cost of mainstream school places [should be based on] the relevant average regional costs published by the DfE school places scorecard."[18]

8.3 The DfE further support the adjustment of each scorecard cost to account for the higher expenses of achieving sustainability standards. The DfE school place scorecard costs for Hertfordshire including a 10% sustainability uplift are as shown in **Table 8** below.

8.4 As the DfE does not provide a figure for Middle school places directly, the county council and HDM uses average of First and Upper.

Table 8: DfE School place scorecard costs for Hertfordshire, including a 10% sustainability uplift (BCIS indexation 1Q2022).

Phase	**Type**	**Scorecards**
First	Expansion	£19,808
Middle	Expansion	£23,656
Upper	Expansion	£27,503
First	New School	£23,715
Middle	New School	£26,215
Upper	New School	£28,716

8.5 Within the HDM temporary per-place costs are as shown in **Table 9** below. It should be noted, that whilst the DfE school place scorecards do not provide a temporary new school cost, the county council has opted to apply the temporary expansion cost to better align and proportion Section 106 requests.

[18] Paragraph 32, Securing Developer Contributions for Education, DfE 2023.

Table 9: Temporary school place scorecard costs used in the HDM (BCIS indexation 1Q2022).

Phase	School Type	Temporary Costings
First	New School	£9,429
Middle	New School	£9,921
Upper	New School	£10,414
First	Expansion	£9,429
Middle	Expansion	£9,921
Upper	Expansion	£10,414

8.6 **Table 10** below shows the proportion of yield projected by the HDM which was anticipated to be permanent or temporary demand for all phases excluding SEND.

Table 10: Section 106 contributions from the HDM for 3231447OUT, Land East of the A10 showing split by education phase for projected permanent and temporary pupil yield demand, excluding SEND requests (BCIS indexation 1Q2022) .

Phase	**Demand**	**Project Type**	**Projected Yield**	**Scorecard Cost**	**S106 Sought**
First	Permanent	New School	114	£23,715	£2,703,938
First	Temporary	New School	13	£9,429	£123,415
Nursery	Permanent	New School	21	£23,715	£495,319
Nursery	Temporary	New School	2	£9,429	£22,608
Middle	Permanent	Expansion	90	£23,656	£2,133,675
Middle	Temporary	Expansion	7	£9,921	£67,099
Upper	Permanent	Expansion	70	£27,503	£1,928,512
Upper	Temporary	Expansion	3	£10,414	£29,504
Post-16	Permanent	Expansion	28	£27,503	£761,865
Post-16	Temporary	Expansion	1	£10,414	£11,656
Total					**£8,277,592**

8.7 Paragraph 37 of the DfE's guidance on Securing Developer Contributions for Education outlines that:

"Special schools require more space per pupil than mainstream schools, and this should be reflected in the assumed costs of provision. Many local authorities set the costs of special or alternative provision school places at four times the cost of mainstream places, consistent with the additional space requirements in Building Bulletin."[19]

8.8 For 3231447OUT, Land East of the A10, the county council charges for SEND places as equivalent to permanent new school places, costs are four times the cost of a mainstream place and include a 10% sustainability uplift.

[19] Paragraph 37, Securing Developer Contributions for Education, DfE 2023.

Table 11: Section 106 Contributions from the HDM for 3231447OUT, Land East of the A10 split by education phase for projected permanent and temporary pupil yield demand, incorporating SEND requests (BCIS indexation 1Q2022)

Phase	Demand	Project Type	Projected Yield	Scorecard Cost	S106 Sought
First	Permanent	New School	114	£23,715	£2,703,938
First	Temporary	New School	13	£9,429	£123,415
Nursery	Permanent	New School	21	£23,715	£495,319
Nursery	Temporary	New School	2	£9,429	£22,608
Middle	Permanent	Expansion	90	£23,656	£2,133,675
Middle	Temporary	Expansion	7	£9,921	£67,099
Upper	Permanent	Expansion	70	£27,503	£1,928,512
Upper	Temporary	Expansion	3	£10,414	£29,504
Post-16	Permanent	Expansion	28	£27,503	£761,865
Post-16	Temporary	Expansion	1	£10,414	£11,656
SEND Primary (First)	Permanent	New School	2	£94,860	£202,594
SEND Secondary (Upper)	Permanent	New School	2	£114,862	£224,131
Total					**£8,704,318**

8.9 In the absence of comparative costings from EFM for 3231447OUT, Land East of the A10, which would explain how altered PPR yields have been charged for, in the absence of evidence that the same yields have been altered proportionately as discussed in Section 5.0, and in the absence of evidence on whether EFM intend to ascertain short-term and long-term demand from modified PPR yields, and if so, how, it is the county council's position that the yields and costs provided in **Table 11** represents the only fully evidenced process of pupil yield projection and charging for 3231447OUT, Land East of the A10.

9.0 Conclusion

9.1 To conclude, Section 5.0 of this paper has presented HDM yields for 3231447OUT, Land East of the A10 relative to estimated yields from DfE PPRs. There are minor differences in yield projections, but these are not considered significant, noting that higher yields from the HDM may be explained by the lack of peak Secondary data in the DfE dataset, otherwise captured by the longer monitoring time frame of the PYS, and that for certain phases the HDM had lower projections.

9.2 It is the county council's position that these minor differences validate the use of PYS data to calibrate the HDM, and that by monitoring yields from 2002 to 2022 (at present), the HDM has responded to changing demographic trends beyond the use of Census 2011 data.

9.3 Furthermore, by distinguishing which proportion of the yield arising from the HDM is expected to be more short-term, creating a demand less than the cohort lifetime of each phase, the county council has been able to split its projected yield into permanent and temporary demand, with the later charged at a lower cost-per place rate, demonstrating a clear ability to consider the passage of time when projecting yield. This has also included applying a temporary cost for new-school places, not otherwise provided, or required directly by the DfE.

9.4 Calculated by dividing the total cumulative number of pupils observed by the total cumulative number of units by type, tenure and bed-size completed, the PPRs provided by the DfE do not distinguish between short and long-term place demand.

9.5 It is also not possible to determine how yield observed in the DfE's dataset is distributed by year group within a given phase. This is particularly relevant for 3231447OUT, Land East of the A10 where contributions are to be sought towards a three-tier education system, but bespoke First, Middle and Upper PPRs are not provided by DfE.

9.6 To alter primary and secondary PPR based yields into First, Upper and Middle results, EFM have assumed that DfE's observed yield is equally distributed across year groups. The county council does not think this is an appropriate approach, as it may result in the underestimation in yield, noting that DfE yields for Secondary, and therefore Upper and Post-16, are already likely to be underestimating yield as DfE's dataset hasn't reached peak. It is questioned what evidence EFM have or can provide to support their assumption that yield is generated uniformly within the DfE dataset or more widely.

9.7 The DfE are clear in their support for the use of local evidence bases, stating that the use of DfE data is voluntary:

> "The department's pupil yield data may be considered a starting point or baseline position, which local authorities can supplement or adjust according to local circumstances and evidence. However, the use of

the DfE data is voluntary and you can continue to rely solely on local pupil yield evidence if this is considered appropriate […]."[20]

9.8 The DfE's document Estimating Pupil Yield from Housing Development has the purpose of "[helping] local authorities develop long-term evidence of pupil yield"[21], alongside further active encouragement for local planning authorities to "[build] on the department's baseline data] and create their own evidence bases, noting:

"Within five years of its publication, the DfE data should be considered up to date. After this time (or sooner if preferred), we encourage you to publish new equivalent pupil yield data at local authority level"[22].

9.9 Having raised concerns about the passage of time in understanding pupil yield, EFM must concede that the latest academic year within which a DfE PPR is available for all phases applicable to 3231447OUT, Land East of the A10 is 2020/21, as Post-16 PPRs are not available for 2021/22. By DfE's own admission, these PPRs may only be considered up to date for a maximum of two further academic years and are already older than the latest yields used to calibrate the HDM, which are from the 2022/23 academic year.

9.10 It is heavily inferred that DfE themselves will not be maintaining the dataset behind their published PPRs, placing the responsibility on each local planning authority to have their own evidence moving forward.

9.11 It is considered that any concession on the use of DfE's PPRs at 3231447OUT, Land East of the A10 and the implications it would pose, may be seen as reverting to an alternative projection method for which the background data is clearly intended to be an optional baseline for local evidence bases, showcased by it's already static publication, with full results capped at 2020/21, ultimately necessitating an alternative approach to be implemented in the long-term.

9.12 The county council thus maintains its corporately agreed and published position to continue monitoring pupil yield in Hertfordshire through the PYS, incorporating observed trends with the HDM, facilitating a proportional and bespoke assessment of pupil yield generation and resultant Section 106 contributions for any development in question, including 3231447OUT, Land East of the A10.

[20] Paragraph 5, Estimating Pupil Yield from Housing Development. Department for Education (2023)
[21] Purpose: Estimating Pupil Yield from Housing Development. Department for Education (2023)
[22] Paragraph 24, Estimating Pupil Yield from Housing Development. Department for Education (2023)