

SUPPLEMENTARY PLANNING DOCUMENT

Education Contributions from Residential Developments



Report of Consultation

May 2026

Contents

1.0	Introduction and Purpose of the Report of Consultation	2
2.0	Persons/bodies/groups consulted	3
3.0	Ways in which consultation was undertaken	3
4.0	Representations	3
5.0	Additional Notes	4
	Appendix 1: Summary of Comments Received and Officer Responses	5
	Department for Education (DfE).....	5
	Resident.....	9
	Historic England (Rowan Stansfield).....	10
	National Highways (Donna Holmes)	10
	Natural England (Sharon Jenkins).....	10

1.0 Introduction and Purpose of the Report of Consultation

- 1.1 A Supplementary Planning Document (SPD) is a document which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues. SPDs are capable of being a material consideration in planning decisions but are not part of the statutory development plan.
- 1.2 The purpose of this SPD is to provide clear and up-to-date guidance on how Nottingham City Council will secure appropriate education provision arising from new residential development. It explains how Policy IN4 (Developer Contributions) of the Local Plan Part 2, together with relevant Core Strategy policies relating to community facilities, should be applied in practice. This includes setting out how the need for additional school places is assessed, the type and scale of education infrastructure required, and the circumstances in which financial contributions will be sought to support new or expanded educational facilities.
- 1.3 A review of the SPD is necessary because the previous guidance had become outdated, with the benchmarking report referred to in the guidance no longer providing a realistic estimate of build costs. The proposed revision is thus focused and limited. The main change is an update to the per-pupil cost figures, bringing them in line with the latest Department for Education (DfE) evidence on the cost of providing school places. These updated costs ensure contribution estimates reflect actual local build costs and future demand and can be indexed appropriately in coming years. In addition, the SPD includes updated supporting text to reflect the latest national guidance, updated pupil yield assumptions and small wording adjustments in earlier sections. No wider policy changes are proposed.
- 1.4 This Report of Consultation (RofC) provides a transparent record of the engagement process undertaken during the development of the revised SPD, demonstrating how the Council has fulfilled its legal obligations and how feedback from the community and stakeholders has informed the final guidance. It summarises the comments received during the consultation period and sets out the City Council's responses, including any recommended changes to the SPD where necessary. While it does not attempt to capture every point made nor address issues outside the scope of the consultation it explains the main changes made in response to consultation feedback and, where no changes have been made, the reasons for this.

2.0 Persons/bodies/groups consulted

- 2.1 Consultation has been undertaken with statutory bodies, local businesses, citizens, agents and developers, wider interest groups and stakeholders, local councillors, and Nottingham City Council officers. Emails/letters providing details of the consultation were sent to all contacts on the Local Plan database of consultees.

3.0 Ways in which consultation was undertaken

- 3.1 Consultation was undertaken in line with the City Council's [Statement of Community Involvement](#) (SCI). The SPD was available to view and download from the City Council's web site alongside an online response form. Copies of the SPD were also available at both Loxley House and Central Library. Emails and letters were sent to interested parties as set out in section 2. The consultation was also advertised on the Nottingham City's [Engage Nottingham Hub](#).
- 3.2 Comments on the draft SPD were invited between **3 to 31 March 2026**, complying with the [four week requirement](#) set out in the Town and Country Planning (Local Planning) (England) Regulations 2012.

4.0 Representations

- 4.1 A total of five representations were received, with three representations simply being correspondence from statutory consultees indicating no comment. Two substantive comments were received: one from the Department for Education and one from a resident. Appendix 1 sets out a summary of the comments made, the City Council's responses to them.
- 4.2 The substantive comments raised included issues relating to SEND, Early Years provision (0-4 years) and post-16 provision (16-19), and capacity assessments.
- 4.3 In response to these comments, the proposed changes to the SPD include clearer processes for deferring or revisiting capacity assessments (new paragraphs 6.10–6.12), strengthened guidance on post-16 provision including updated pupil yield assumptions and a new costed entry in the education phase table (paragraphs 8.8, 8.10, 8.11 and Appendix 1 in the SPD), clarification in paragraph 6.7 that contributions for Early Years (0–4) may be sought where capacity is insufficient, and the addition of a new paragraph 8.19 confirming that SEND provision should follow Building Bulletin 104 where practical. These changes will strengthen the approach taken to handling planning obligations relating to education and are sufficiently within the scope of existing policy to justify their inclusion.

5.0 Additional Notes

- 4.4 The consultation on this SPD took place at a time when SPDs are being phased out, with any new SPD required to be adopted by 30 June 2026 under [The Levelling-up and Regeneration Act 2023 \(Commencement No. 11 and Saving and Transitional Provisions\) Regulations 2026](#). This tight deadline has limited the scope for making extensive changes. As a result, some matters that need more detailed development, particularly those relating to SEND provision, are being deferred to the next local plan review.
- 4.5 To support an efficient and timely analysis of consultation responses, the Council has made use of Artificial Intelligence (AI) tools to help organise and summarise the comments received in this report. These tools were used solely to improve efficiency and reduce administrative processing time. All original comments were read and reviewed by Council officers, and all AI generated summaries were subsequently checked, verified, and where necessary amended by officers to ensure accuracy, impartiality, and full alignment with the representations submitted.

Appendix 1: Summary of Comments Received and Officer Responses

Summary of comments	City Council response	Proposed Changes
Department for Education (DfE)		
<p>The department welcomes the reference in paragraph 7.1 to the need for S106 to <i>'provide funding for construction and, where required land'</i> to meet the need for additional capacity arising from new developments. We also welcome the documents commitment to use the latest regional scorecard costs plus a 10% uplift when calculating the cost of mainstream places, this accords with our guidance and Planning Practice Guidance.</p>	<p>Given that this is the core amendment to the SPD, this comment is welcomed as it confirms that the proposed changes set out in the SPD aligns with the approach recommended by the DfE.</p>	None.
<p>It would be helpful if this guidance document or future iterations of it could be amended to address the following points:</p> <ul style="list-style-type: none"> - <i>Cross-Border Capacity Assessments</i> – include more information on how cross-border flows of pupils between Nottingham CC and neighbouring authorities will be assessed and considered when assessing the need generated by new housing developments. 	<p>Cross border movement with the neighbouring Nottinghamshire County Council is already factored into our pupil forecasting methodology. When we consider a claim for developer contributions, we assess the additional pupil yield anticipated from new housing, against the forecasted demand for places and existing capacity. Therefore, cross-border flow of pupils is already accounted for. We track the net loss of city pupils to Notts County schools. For secondary cohorts, this has reduced from 11.5% (2013) to 7.5% (2025). For primary cohorts, the net loss of pupils has stayed more stable over the last 6 years but noting a slight increase of 1% to just under 5%.</p> <p>For these reasons, it is not considered necessary to amend the SPD to cover this issue.</p>	None.
<ul style="list-style-type: none"> - <i>Deferring Capacity Assessments</i> – DfE requests the addition of more detail on the process that Nottingham City Council will use for deferring or revisiting capacity assessments. 	<p>Noted and agreed. Further clarity and the draft wording for these new paragraphs were discussed with DfE and agreed upon – see proposed changes.</p>	<p>New paragraphs 6.10-6.12:</p> <p>Deferred or Revisited Capacity Assessments</p>

		<p>6.1 Where a capacity assessment cannot reasonably be completed at the point of determining an application the City Council may defer or revisit the assessment to ensure it reflects the most up to date pupil forecasts and school capacity position.</p> <p>6.2 A revised assessment may be undertaken at key stages including:</p> <ul style="list-style-type: none"> • prior to signing the S106 agreement (if negotiations are prolonged), • prior to commencement of development, • at the start of each phase (for multi-phase schemes), • or where updated local evidence indicates material changes in forecast demand or available capacity. <p>6.3 Reassessments will use the latest Council pupil forecasts, school capacity data, and the most recent cost per place benchmarks. Contributions will be adjusted accordingly, ensuring obligations remain necessary, directly related to the development, and fairly and reasonably related in scale and kind.</p>
<p>- <i>SEND</i>: The cost of providing a SEND place is typically four times higher than the cost of providing a standard mainstream place and it would be helpful if this were reflected in the document.</p>	<p>It is recognised that a full future review of the methodology for claiming developer contributions in relation to pupils with SEND is required. Although the pupil charge would be higher if changed to revised approaches currently being discussed by DfE, it could limit our ability to claim</p>	<p>None.</p>

	<p>for SEND contribution in developments of less than 100 houses. As such, these changes might result in loss in SEND contributions, not an increase. Given this, this issue requires considerable additional work and testing to ensure that the proposed changes result in contributions that reflect true need and demand.</p> <p>This investigation will coincide with the review of the Local Plan later in 2026, but which won't be implemented until 2029/30. This will include accounting for the higher cost of providing a SEND place, which as noted, is typically around four times higher than the cost of providing a standard mainstream place. A review of recent local projects to deliver additional SEND capacity will be considered to inform this. A future review will also look to provide flexibility for the LA to claim for SEND places in isolation, in those circumstances where it may not be justifiable to claim for mainstream places.</p> <p>However, the scale of this task is beyond what is achievable in the timeframe available to amend this SPD (see 5.1), and this cannot be addressed currently.</p>	
<p>SEND should meet the space standards set out in Building Bulletin 104, and it would be helpful if the document referenced BB104.</p>	<p>Noted and agreed. Document has been amended to reflect this.</p>	<p>New paragraph 8.18: For SEND facilities, where practical and appropriate, the guidelines set out in Building Bulletin 104 or successor documents will be followed.</p>
<p>The SPD would be strengthened by the addition of a clearer methodology around how developer contributions will be sought to meet the need for post sixteen places.</p>	<p>Noted and agreed. The existing SPD has wording to this effect; however, we agree that the wording around methodology is limited and should be strengthened. To this end several proposed revisions have been made to ensure that the document provides a clearer stance on this.</p> <p>Noting that the original wording related to both Early Years and Post 16 education, we have</p>	<p>Proposed additional sentence to this paragraph underlined below:</p> <p>6.7 The Council may therefore require a contribution for Early Years provision (0-4 years) and post-16 provision (16-19) if a proposed development will result in insufficient capacity. <u>The quantum of places generated by a new development for Early Years provision will be</u></p>

amended both aspects, with most of the edits relating to the latter.

assessed on a case-by-case basis, where deemed necessary by the Council. ...

Amendment to table after paragraph 8.8 – new bottom row (underlined)

Education phase	Places generated per 100 dwellings	Cost per place – 2026 SPD update ¹
Primary	21	£ 23,169
Secondary	15	£ 31,867
<u>Post-16</u>	<u>3</u>	

New paragraphs 8.11:

8.11 Local Authorities are now advised by the DfE to include the additional demand for Post-16 places (16-18) within their pupil yield data and to seek contributions accordingly. Using the formula set out, it is assumed that for every 100 dwellings, there will be approximately 3 pupils generated per school year group. Although there are technically two additional year groups in the sixth form, the average post-16 staying-on rate in Nottingham is around 50%. As a result, the number of extra places required is effectively equivalent to just one additional year group.

Resident

The respondent welcomed the inclusion of an uplift for SEND costs but felt the percentages appear low based on their local experience of city schools. They question

These comments are noted and appreciated. There is a specific context to these consultations, namely this is a targeted policy update that is being made under a tight and inflexible deadline

None.

<p>whether the figures only reflect formally diagnosed needs and suggested that early years and primary settings may require higher uplifts, as identification often begins at these stages. They also highlight that schools are already under significant pressure supporting SEND families and that rising pupil numbers will compound these challenges.</p>	<p>(end of June 2026) to address an urgent policy issue (see 5.1). We are aware of the need to review the approach to SEND contributions – see earlier response on this issue raised by DfE. However, given the complexity of SEND costs, these issues will be addressed in a further policy review exercise undertaken as part of the next local plan consultations. This will ensure that there is sufficient time to appropriately explore the best response to addressing this.</p>	
Historic England (Rowan Stansfield)		
Do not have any comments to raise.	Noted	None
National Highways (Donna Holmes)		
Do not have any comments to raise.	Noted	None
Natural England (Sharon Jenkins)		
Do not have any comments to raise.	Noted	None