

**Our Ref: DfE/Area Action Plan/October 2020**

5<sup>th</sup> October 2020

Dear Sir/Madam,

**Re: North East Cambridge Area Action Plan**

**Consultation under Regulation 18 of Town and Country Planning (Local Planning) (England) Regulations 2012**

**Submission of the Department for Education**

1. The Department for Education (DfE) welcomes the opportunity to contribute to the development of planning policy at the local level.
2. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and DfE is the delivery body for many of these, rather than local education authorities. However, local education authorities still retain the statutory responsibility to ensure sufficient school places, including those at sixth form, and have a key role in securing contributions from development to new education infrastructure. In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. We have published guidance on education provision in garden communities and securing developer contributions for education, at <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>. You will also be aware of the corresponding additions to Planning Practice Guidance on planning obligations, viability and safe and healthy communities.
3. We would like to offer the following comments in response to the above consultation document. These comments follow from our previously submitted representations (March 2019) to the AAP which are appended, and also our representations to the Greater Cambridge Plan (February 2020).

#### **General Comments**

4. DfE is looking to secure a site for the delivery of Cambridge Maths School through The Learning Alliance (a multi academy trust formed from merging Cambridgeshire Educational Trust into the Morris Education Trust) and has identified North East Cambridge as an ideal location for this, due to regional accessibility and wider economy and skills concentration. We look forward to working with Greater Cambridge Partnership (GCP) officers to achieve this and establish a high-performing educational establishment in the City. The

government has committed to having a 16-19 maths school in every region, 11 in total.

5. By virtue of their high entry requirements, maths schools are small schools (with up to 250 places but usually 200 or less), this helps foster a close-knit and nurturing learning community. This is part of a range of initiatives to improve maths provision, including the Level 3 Mathematics Support Programme, and additional funding via the Advanced Maths Premium to support providers to increase A level maths participation; maths schools will also complement the work of Maths Hubs. Maths schools are characterised by high-quality long-term involvement from a university with a strong mathematics department – in this case Cambridge University. We expect the associated university to be committed to and accountable for the success of the school through a formal link with school governance and provision of, for example, curriculum and outreach support.
6. Two maths schools are currently established: King's Maths School and Exeter Maths School (opened in partnership with King's College London and Exeter University respectively). Further maths schools in Cambridge, Durham, Imperial College London, Lancaster and Surrey are planned to open in two to three years, and Liverpool opened in September 2020. Ofsted found that the open maths schools (at King's and Exeter) both achieve high academic results, and provide an outstanding education, in 2017 inspections. In 2019 King's Maths School was top in the country for A level attainment, ahead of every other school including independent schools. 100% of King's students, and 93% of Exeter's students, achieved an A or A\* in A level mathematics. In 2019 King's had an A level maths progress score of 1.28 and Exeter 1.45, meaning that pupils in these schools achieved on average a grade higher than similar students nationally; this places both schools in the top 1% of schools for A level maths progress.
7. All maths schools must offer A levels in Maths and Further Maths. There is some flexibility beyond this – there will be at least a third subject option which must include physics and be limited to STEM subjects.
8. The staffing model will be a matter for the school, in line with its pupil numbers and funding. Typically, a school (when full) will have a headteacher and assistant head, plus administrator, directors of faculty/subject leaders/subject teachers, teaching assistants, people with specialisms such as SEND & EAL, and typically graduate assistants/learning mentors. Schools will typically employ 15-20 FTE staff.
9. Maths schools are expected to draw pupils from a wide area, with pupils travelling for up to an hour/30 miles or even further. Therefore accessibility to transport links is important not just for the young people attending the school but also because maths schools are required to provide specialist outreach support to schools within their region, complementing the work of maths hubs. Teachers at the school will be travelling out to surrounding schools to do this. Also, pupils and their teachers at those schools will wish to be able to reach the maths school to access CPD and other opportunities.
10. As demonstrated by the open schools the highly specialist nature of the provision at maths schools, where every student has to undertake A Levels in maths and further maths, means we expect that it will only attract typically one or two pupils each from other schools and pupils will travel further than usual to access maths schools.

11. DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure at section 6.3. DfE notes that the AAP includes site allocations pertaining to school delivery.
12. It is noted that paragraph 2.2 (3) 'Strategic Objectives North East Cambridge' will help meet the strategic needs of Cambridge and the sub-region. This wording is supported.
13. The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 94).
14. GCP should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development<sup>1</sup> (2011) which sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system.
15. Please note that there are two routes available for establishing a new school. Firstly, a local authority may seek proposals from new school proposers (academy trusts) to establish a free school, after which the Regional Schools Commissioner will select the successful trust. Under this 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and managing the build process. Secondly, school proposers can apply directly to DfE during an application round or 'wave' to set up a free school, or (for maths schools) through submitting a business case. The local authority is less involved in this route but may support groups in pre-opening and/or provide a site. Either of these routes can be used to deliver schools on land that has been provided as a developer contribution. DfE has published further general information on opening free schools<sup>2</sup> as well as specifically in relation to opening free schools in garden communities.<sup>3</sup>

## **Specific Comments**

### ***Social and Community Infrastructure – Policy 14***

#### ***Question 5 - Are we are planning for the right community facilities?***

16. We welcome the reference to new social infrastructure (including schools) to be required to meet the needs of existing and new communities.
17. However, as drafted, it is not considered that this policy is wholly compliant with the NPPF, as it provides policy support only where there is recognised 'local needs'. The NPPF, as set out above, gives weight to widening choice in education, which would include through the provision of specialist educational facilities.
18. We would therefore propose that the policy be extended as follows (additional wording in *italics underlined*):

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<sup>1</sup><https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>2</sup> <https://www.gov.uk/government/collections/opening-a-free-school>

<sup>3</sup> <https://www.gov.uk/government/publications/establishing-a-new-school-free-school-presumption>  
and <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>

Development proposals for new community, cultural and leisure facilities will be supported where it meets identified local needs. State funded education infrastructure which is capable of meeting wider regional needs will also be supported where this is deliverable and sustainable.

19. This will ensure that the policy is compliant with the NPPF and is positively prepared.

**Policy 10d: Station Approach**

20. Cambridge Maths School was approved as a Free School project in 2017 It will be operated by The Learning Alliance Trust and be a specialist 6<sup>th</sup> form of 200 pupils (opening with 100 initially).
21. LocatED is an Arms-Length Body to the Department for Education. It is responsible for buying and developing sites in England to help deliver much needed new school places for thousands of children.
22. LocatED was commissioned to identify and acquire a site within Cambridge to facilitate the school, of c.2,450 sq m. An extensive site search was undertaken originally in 2017 and a follow up search in 2018/20 which demonstrated the challenges of land availability and suitability.
23. The first site search identified eight potential sites of which only one was worthy of further consideration. This was the Cambridge North Brookgate site. The other sites were not suitable for a number of reasons; they were either not close enough to Cambridge or Cambridge North train station or they were discounted as they were too small for the requirement. LocatED carried out a new site search in May 2019 to see if any new sites had come to the market. In total this site search produced 16 potential sites. These were mostly vacant office buildings that LocatED thought may be able to accommodate the maths school. However, office agents in Cambridge confirmed that commercial landlords did not wish for a maths school to occupy their space This is because landlords were conscious that by letting part of an office to a school, it may act as a disincentive to other traditional office users who may have been interested in occupying the rest of the property. This is despite the age of the students. Furthermore, the location of the office units also played a part in some of these sites not being suitable.
24. In 2020, further to this review search (which identified 16 sites), a shortlist of four sites was drawn up. A high level discussion was then held in March 2020 between LocatED's Jacqueline Nixon and the Assistant Director of Planning at GCP (Sharon Brown) to discuss the four shortlisted sites. In relation to the discussion of those sites, as well as further due diligence, the site (Land to the east of Cowley Road, Cambridge CB4 0AE) was considered to be the most suitable. The site forms part of a consortium-led development known as Station Approach, owned by the Chesterton Partnership (Network Rail, DB Schenker and Brookgate).
25. LocatED and Brookgate have been working together in relation to the relevant landholding, to bring forward a mixed-use development. There is an agreement with LocatED and Brookgate as the landowner to bring forward Cambridge Maths School as part of the overall development, with a planning application anticipated for submission by December 2020.
26. There are no constraints or policy conflicts arising from the identified site.

## **Site Suitability**

27. The site is the most sustainably located of all of the sites appraised as part of the site search. This is due to its proximity to Cambridge North Station and busway interchange. Maths Schools are expected to have regional accessibility and therefore this is an optimum location for accessibility and sustainability. A full transport assessment will be undertaken and travel plan will be drawn up (having regard to the necessary policy requirements) to support the forthcoming planning application.
28. The proposed Maths School in land use terms is considered to be suitable for inclusion within a mixed-use residential/employment area. Indeed, the students who attend maths schools are high performing and studying a range of STEM subjects which are classroom based. The number of students is low and therefore it is unlikely that there will be any impact on amenity arising from the proposals.
29. The site has no heritage or ecological designations and is within Flood Zone 1. The layout and design will consider associated environmental constraints and propose mitigation measures where required.
30. The site may have former contamination issues which will be dealt with through detailed assessment provided at planning application stage.
31. The school is proposed to be built by Brookgate as part of the Cambridge North masterplan (location plan is appended) which would represent efficient land use and sustainable development, as well as enhancing mixed and balanced communities.
32. Therefore the allocation should include supportive wording which is sufficiently flexible for this use, as there are no alternative preferable sites. The development of a maths school at this site would assist in widening educational choice and attainment, and act as a high quality educational anchor for a mixed-use development within the AAP land in North East Cambridge. Policy wording should enable the delivery of specialist educational facilities in addition to schools meeting the needs of the wider demographic/population growth. This is required to ensure that the plan is compliant with the NPPF in widening choice.
33. The Learning Alliance trust has established links with Cambridge University and has also been in contact with the education authority at Cambridgeshire County Council, which has expressed support for the school (and a letter from CCC is appended setting this out in fuller detail).

## **Conclusion**

34. Finally, I hope the above comments are helpful in shaping the North East Cambridge AAP, with specific regard to the provision of land and a positive policy context for the proposed Cambridge Maths School. Please advise DfE of any proposed changes to the emerging policies, supporting text, site allocations and/or evidence base arising from these comments.
35. Please do not hesitate to contact me if you have any queries regarding this response. DfE looks forward to continuing to work with GCP to aid in the preparation of a sound AAP.

Yours faithfully,

**Phoebe Juggins MRTPI**  
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*Cc: Jacqueline Nixon, LocatED, Lead Planner  
Hazel Belchamber, Cambridgeshire County Council, Assistant Director: Education Capital  
& Place Planning  
Alison Wright, Bidwells (on behalf of Brookgate)*

*Enc: Site location plan for Cambridge North  
Letter from Assistant Director: Education Capital & Place Planning Cambridgeshire  
County Council  
Copy of previous 2019 representations*