



Shamus Giles
Flood & Development Management
Cumberland Council
Parkhouse Building
Baron Way
Carlisle
CA6 4SJ

18th February 2024

Dear Shamus,

PLANNING APPLICATION FUL/2022/0159

This letter is written notwithstanding my position that this development is outside the local plan, and should not be approved on that basis. It is an attempt by the developer to subvert the planning rules that exist to ensure that local residents are adequately consulted, and development is sustainable.

Firstly, I am glad that the council recognises the requirement for a signalled crossing on the A597 for safe passage to Beckstone School, and the need to upgrade the Scaw Road junction. I would argue that these improvements are necessary not just in order to make this development sustainable, but are required now – but that is outwith the scope of this letter.

Recognising you also have some concerns as the LLFA, this letter is primarily about the requested education contributions.

In 2021 I wrote to Gavin Murray on a similar proposal in High Harrington, about the serious flaws that existed then in the council's modelling, and the assessment of contributions required to make that development sustainable. A copy of that letter is enclosed with this one, and all of my requests for information remain outstanding. I would ask that your department action my outstanding requests and keep me updated.

Unfortunately, despite me making similar representations time and time again, I see that similar flaws have been repeated in your response to this current application, which pre-dated my own response by just a number of days.

Faith Schools and the University Technical College

As I made clear in my earlier letter, I'm concerned at the proselytisation in which the council seems actively engaged – particularly in Harrington. I am a staunch defender of faith schools of all types but the council would simply not countenance only opening places in Islamic or Jewish schools, for example. School choice includes the inalienable right of a parent to choose a school close to their community that is not of religious character.

In St Mary's published school admissions policy, non-Catholic local children feature at **ninth** in the **nine** ordered admission criteria.

While the link to the St Joseph's school admissions policy is broken, at the time of writing in 2021, non-Catholic pupils featured at **eleventh** on an ordered list of **eleven** admittance criteria.



These schools are already conferred an advantage by virtue of the fact that the council must provide subsidised transport to school for Catholic children living more than two miles away, but who choose to attend the schools by virtue of their religious character. This is not an option available to non-Catholics.

Places in the Energy Coast University Technical college should not be counted in your calculations as it cannot take the full age range for secondary pupils, and places **must** be provided in years 7,8 and 9 elsewhere. Your flawed modelling seeks to deprive the closest catchment secondary school, which has a significant projected place deficit, of the funding required to provide those places and make any new development sustainable.

Pupil Yield Data

Again, the council has relied on ONS pupil yield data, which is flawed in the context of West Cumbria – particularly for Harrington, Seaton and Stainburn. We have significant data on pupil yield over many years, which should be used to properly inform the requirements for sustainable development.

You state that the pupil yield for the ongoing development 2014/0429 has not been included in the assessment, which would represent a serious omission with no justification. The yield could be spread across the 3 catchment schools, or in order to be more accurate you could survey the three schools for the number of children in each who live on the new development, much of which has been inhabited now for some years.

I note that you have failed to provide the pupil yield/application table to which you refer in your letter. Please provide that to me and the planning department for publication at the earliest opportunity.

Education Contributions

As it stands, you are requesting a primary contribution for just 22 of the expected 26 primary pupils, already using flawed calculations. You have chosen to use the standard contribution rather than the actual cost of development, an option that is readily available to you. The sum requested therefore is £398,244, but it would seem to me that you do not have a plan to provide those spaces, for that number of children, at Beckstone – the catchment school.

When this happened in a previous application, with the sum expected to go to providing places in Beckstone School, the council soon realised that site abnormalities meant that the project required a significantly enhanced capital contribution. The funding was then reallocated to providing places at St Marys while leaving a deficit in Beckstone. I refer you back to my earlier comments on proselytisation.

On secondary contributions you have asked for £0, despite the council's own projections showing that Workington Academy, as the catchment secondary, is expected to breach its capacity by nearly 200 pupils in the coming years. They would argue that those figures are an under-representation of the true expected pupil numbers.

I ask that you revisit both of these requests, and would be happy to facilitate site visits to any of the schools, which I expect they would welcome.

It is disappointing that this challenge should have to come from me, when it should be coming from Cumberland Councillors elected to the ward and in the case of development sustainability, should be coming from council officers.



I am copying this letter to the ward councillors on Cumberland Council and Workington Town Council; to the Portfolio Holder for Cumberland Policy and Regulatory Services; and to the Portfolio Holder for Lifelong Learning and Development, who I hope has responsibility for schools under the responsibility listed as '*Access to Education*' - incredibly the word '*school*' doesn't appear in the list of responsibilities of **any** portfolio holder, so I can understand how education appears to be a secondary consideration to those of us on the outside.

I am also copying to Beckstone School and Workington Academy, who will be at the sharp end of this and other applications where the assessment of the sustainability of any development has not been properly considered in the context of education. Finally, I will copy to the planning department for publication against the application.

Yours sincerely

Mark Jenkinson MP