



Our Ref: ESFA/Local Plan/North Dorset 2017

19/01/18

Dear Sir/Madam,

Re: North Dorset Local Plan Review

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

Submission of the Education and Skills Funding Agency

1. The Education and Skills Funding Agency (ESFA) welcomes the opportunity to contribute to the development of planning policy at the local level.
2. The ESFA launched on 1st April 2017, bringing together the existing responsibilities of the Education Funding Agency (EFA) and the Skills Funding Agency (SFA), to create a single funding agency accountable for funding education and training for children, young people and adults. The ESFA are accountable for £61 billion of funding a year for the education and training sector, including support for all state-provided education for 8 million children aged 3 to 16, and 1.6 million young people aged 16 to 19.
3. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and the ESFA is the delivery body for many of these, rather than local education authorities. As such, we aim to work closely with local authority education departments and planning authorities to meet the need and demand for new school places and new schools. In this capacity, we would like to offer the following comments in response to the proposals outlined in the above consultation document.

General Comments on the Local Plan Approach to New Schools

4. The ESFA notes that some growth in housing stock is expected in the district; the adopted Local Plan (2015) confirms the annual housing target of 285 homes, while the more recent Strategic Housing Market Assessment (2015) and draft national standardised methodology indicate an annual requirement of 330 and 366 respectively. This will place additional pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.
5. The ESFA welcomes reference within the plan to support the development of appropriate social and community infrastructure. In light of the requirement for all Local Plans to be consistent with national policy, you will have no doubt taken account of key national policies relating to the provision of new school places,

but it would be helpful if they were explicitly referenced or signposted within the document. In particular:

- 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 72).

- The ESFA supports the principle of North Dorset District Council safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.

- The Council 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*'¹ (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.

6. In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 156)², the ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add the ESFA to your list of relevant organisations with which you engage in preparation of the plan.
7. In this respect, the ESFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD)³. The DPD provides policy direction and establishes the Council's approach to providing primary and secondary school places and helps to identify sites which may be suitable for providing them, whether by extension to existing schools or on new sites. The DPD includes site allocations as well as policies to safeguard the sites and assist implementation and was adopted in May 2016 as part of the Local Plan. The DPD may provide useful guidance with respect to an evidence based approach to planning for new schools in the emerging North Dorset Local Plan, securing site allocations for schools as well as providing example policies to aid delivery through Development Management policies.
8. Ensuring there is an adequate supply of sites for schools is essential and will ensure that the Council can swiftly and flexibly respond to the existing and future need for school places to meet the needs of the borough over the plan period.

Site Allocations

9. At this early stage of the emerging Local Plan, site allocations have not yet been drafted, though it is noted that many site allocations are expected to be carried forward from the existing Local Plan. The next version of the Local Plan should seek to identify specific sites (existing or new) which can deliver the school

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf

² NPPF paragraph 180 specifies that this collaborative working should include infrastructure providers.

³ https://www.ealing.gov.uk/info/201164/local_plans/1961/planning_for_schools_dpd

places needed to support growth, based on the latest evidence of identified need and demand in the updated Infrastructure Development Plan (IDP). The IDP or other published evidence document should set out clearly how the forecast housing growth at proposed site allocations has been translated (via an evidence based pupil yield calculation) into an identified need for specific numbers of school places and new schools over the plan period. This would help to demonstrate that the approach to the planning and delivery of education infrastructure is justified based on proportionate evidence. If required, the ESFA can assist in providing good practice examples of such background documents.

10. The site allocations or associated safeguarding policies should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. For an example of the latter, see draft policy CC7 in Milton Keynes's Plan:MK Preferred Option draft from March 2017⁴.
11. While it is important to provide clarity and certainty to developers, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. The ESFA therefore recommend the Council consider highlighting in the next version of the Local Plan that:
 - specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that
 - requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.

Developer Contributions and CIL

12. One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. The ESFA notes that North Dorset District Council has postponed the adoption of CIL pending the national CIL review, though the draft Regulation 123 list includes education with the exception of education facilities directly related to a development. At present, the Council continues to rely on Section 106 Agreements. The ESFA supports the Council's approach to ensure developer contributions address the impacts arising from growth, providing the most effective funding mechanism will be employed to maximise contributions for education.
13. The ESFA would be particularly interested in responding to any update to the IDP or review of infrastructure requirements, which will inform not only the emerging Local Plan but also any CIL review and/or amendments to the Regulation 123 list. As such, please add the ESFA to the database for future CIL consultations.

⁴ <https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/plan-mk>

Conclusion

- 14. Finally, I hope the above comments are helpful in shaping the North Dorset Local Plan Review, with specific regard to the provision of land for new schools. Please advise the ESFA of any proposed changes to the emerging Local Plan policies, supporting text, site allocations and/or evidence base arising from these comments.
- 15. Please do not hesitate to contact me if you have any queries regarding this response. The ESFA looks forward to continuing to work with North Dorset District Council to aid in the preparation of a sound Local Plan.

Yours faithfully,



Liz Pickering MRTPI
Forward Planning Manager

