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www.gov.uk/esfa

Our Ref: ESFA/Warrington Local Plan Preferred Options 2017

12th September 2017

Dear Sir/Madam,

**Re: Warrington Borough Council Local Plan Preferred Development Option
Consultation July 2017**

**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, brings 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 borough; the Warrington Borough Local Plan Preferred Option (2017) confirms the annual housing target of 1,113 homes per annum over the 20m year Plan period. 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. 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 Warrington Borough 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.

- Warrington Borough 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. The ESFA note your Statement of Community Involvement was published in 2014. 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 (including, where necessary and justified, on Green Belt/MOL), 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 Warrington 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 Warrington 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.

Preferred Development Option

Paragraph 5.22 highlights the need for a new primary school to be provided as part of the Peel Hall site. Paragraph 5.23 highlights the fact that there will be a

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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

deficiency in primary school places within the central area of the main Warrington urban area. The document also acknowledges within paragraph 5.8 (page 31) the need for new and expanded primary schools, which is welcomed by the ESFA. We would therefore encourage the Council to go further and to allocate sites for new schools alongside/within the planned housing growth sites, to help with school place planning.

We support the recognition given within the Warrington Garden Suburb (page 40) section of the document for the need to provide four new primary schools, to meet the planned housing growth within this new suburb. To assist in their delivery, it would be helpful if figure 7 (page 41) highlighted the preferred locations for the new primary schools.

Site Allocations

9. The next version of the Local Plan should seek to identify specific sites which can deliver the school places needed to support growth, based on the latest evidence of identified need and demand in the Infrastructure Delivery Plan (2014). The site allocations and/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.
10. 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 recommends 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.
11. The ESFA would like to be included as early as possible in discussions on potential site allocations, as there are pipeline school projects in Warrington borough which may be appropriate for specific designation. We would welcome the opportunity to meet with the council in the near future to discuss these projects.

Forward Funding

12. In light of identified preferred option of developing a Warrington Garden Suburb, emerging ESFA proposals for forward funding schools as part of large residential developments may be of interest to the Council. We would be happy to meet to discuss this opportunity at an appropriate time.

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

It would be useful if a Planning for Schools topic/background paper could be produced, expanding on the evidence in the Council's Infrastructure Delivery Plan, setting out clearly how the forecast housing growth at allocated sites 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 more clearly 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 relevant to this stage of your emerging Plan.

Developer Contributions and CIL

- 13. 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 note that Warrington borough have produced a Planning Obligations SPD (2014) which reflects local priorities, and that the Council will introduce CIL guidance in parallel with the emerging Local Plan to ensure appropriate rates are levied and the right infrastructure is secured across the borough. The ESFA support the Council's approach to ensure developer contributions address the impacts arising from growth.
- 14. The ESFA would be particularly interested in responding to any update to the Infrastructure Delivery Plan or review of infrastructure requirements, which will also inform the emerging CIL. As such, please add the ESFA to the database for future CIL consultations.

Conclusion

- 15. Finally, I hope the above comments are helpful in shaping Warrington's Local Plan, 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.
- 16. Please do not hesitate to contact me if you have any queries regarding this response. The ESFA looks forward to continuing to work with Warrington borough to aid in the preparation of a sound Local Plan.

Yours faithfully,

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