

From: [REDACTED]
To: [Local Dev. Framework](#)
Subject: ESFA representation
Date: 12 February 2018 17:41:37
Attachments: [image001.jpg](#)
[Local Plan Reg 19 letter Craven LP ESFA Final12.02.2018.pdf](#)

Dear Sir/Madam,

Please find attached a copy of the Education and Skills Funding Agency's comments on the Craven Local Plan consultation. Should you have any queries concerning this response please do not hesitate to contact me.

Yours faithfully,

[REDACTED]

[REDACTED]

Forward Planning Manager (North), Free Schools Capital
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Our Ref: ESFA/Craven Publication Draft Local Plan/February 2018

12th February 2018

Dear Sir/Madam,

Re: Craven Publication Draft Local Plan

Consultation under Regulation 19 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 submitted comments to the Craven Local Plan Consultation (Reg 18), in July 2017, in which we made a number of comments and suggestions in relation to the education sections of the Local Plan, which we felt would help support the development of a sound Local Plan.

Comments on the Local Plan / Site Allocations DPD

3. As you will be aware, the primary focus at this stage of the Local Plan's preparation is on the soundness of the plan, with regard to it being positively prepared, justified, effective and consistent with national policy. The following detailed comments set out the ESFA's view of the plan's soundness in respect of education provision.
4. Given the requirement for all Local Plans to be **consistent** with national policy, the ESFA also welcomes the explicit reference in paragraph 8.53 to the importance placed within the NPPF on the need to ensure that a sufficient choice of school places is available to meet the needs of existing and new communities. Amending Policy INF1 Planning Obligations to include support for the allocation of land for the expansion of existing schools, and/or the provision of new schools, would further demonstrate that the plan has been '**positively prepared**' based on a strategy which seeks to meet objectively assessed infrastructure requirements.
5. It would be helpful if Policy INF6 Education Provision were amended to include links to the relevant documents used by NYCC to assess need and demand for

additional school places. Whilst we have no doubt around the quality of assessment undertaken by NYCC this would help to demonstrate more clearly that the approach to the planning and delivery of education infrastructure is **justified** based on proportionate evidence.

6. In light of **Draft Policy SP5: Strategy for Skipton**, 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.

Evidence Base

7. It would be useful if a Planning for Schools topic/background paper could be produced 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

8. 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 you do not currently have a CIL charging schedule in place and that S106 Agreements will be used to secure the infrastructure necessary to new support new development sites within Craven. The ESFA supports the Council's approach to ensure developer contributions address the impacts arising from growth.
9. The ESFA has requested modifications to the Local Plan to ensure that sufficient developer contributions are sought in all cases. In the opinion of the ESFA, the Local Plan does not demonstrate effectiveness in delivering education infrastructure, because Draft Policy INF6: Education Provision fails to give sufficient guidance regarding the funding mechanism that will be used to provide additional school places. The ESFA considers this to be an issue of soundness which can be rectified by ensuring that the infrastructure policies and supporting text include the following:
 - Free transfer of land to the Council and construction costs to be met by the development, including trigger points for delivery, on sites which include a school.
 - Clear references to the funding mechanism to be applied, whether Section 106 or CIL, and cross-references to the relevant evidence that justifies this approach.

Conclusion

10. Finally, I hope the above comments are helpful in finalising Craven's Local Plan, with specific regard to the provision of land for new schools.

11. Please notify the ESFA when the Local Plan is submitted for examination, the Inspector's report is published and the Local Plan is adopted.
12. Please do not hesitate to contact me if you have any queries regarding this response. The ESFA looks forward to continuing to work with Craven District Council to develop a sound Local Plan which will aid in the delivery of new schools.

Yours faithfully,

 **MRTPI**
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