

## neighbourhood plans

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**From:** PICKERING, Liz [REDACTED]  
**Sent:** 15 December 2017 09:58  
**To:** neighbourhood plans  
**Subject:** Neighbourhood Plan consultation responses  
**Attachments:** Torbay Paignton NP Reg 16 ESFA response.pdf; Torbay Brixham Peninsula NP Reg 16 ESFA response.pdf; Torbay Torquay NP Reg 16 ESFA response.pdf

Good morning,

Please find attached 3 consultation responses in relation to Neighbourhood Plan consultations for Brixham Peninsula, Torquay and Paignton, submitted on behalf of the Education and Skills Funding Agency.

I'd be grateful if you could send an acknowledgement of receipt.

Kind regards,

### **Liz Pickering MRTPI**

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Education & Skills Funding Agency

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Education & Skills  
Funding Agency



**Our Ref: ESFA/Neighbourhood Plan/Brixham 2017**

15/12/17

Dear Sir/Madam,

**Re: Brixham Peninsula Neighbourhood Plan**

**Consultation under Regulation 16 of The Neighbourhood Planning (General) 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. The ESFA has also commented on the Paignton and Torquay Neighbourhood Plans; those representations may also be relevant to the Brixham Peninsula Neighbourhood Plan where there are cross-boundary issues to be considered.

**Comments on the Neighbourhood Plan Approach to Education**

4. The ESFA notes that the adopted Torbay Local Plan (2012-2030) outlines strategic delivery areas and a policy framework for neighbourhood plans, which are then expected to allocate sites to meet the objectively assessed needs (OAN) and infrastructure requirements identified in the Local Plan. The Local Plan proposes 660 homes in the Brixham Peninsula over the plan period. The ESFA welcomes the Neighbourhood Plan's housing allocations set out in Policy BH3, the delivery of which will facilitate strategic planning for schools.
5. The ESFA welcomes the detailed consideration of education in the Neighbourhood Plan and supports Policies L1, L2 and L3. However, while the ESFA supports the requirement in Policy L2 for accessible education provision

that is responsive to changing demand, a minor modification is recommended to include secondary education.

6. The EDFA disagrees with the sentiments in paragraphs 9.3.3 and 9.7.3, which make the case for over-provision of school places “as prediction of the exact numbers of incoming families is impossible.” Torbay Borough Council is required to predict school place requirements as accurately as possible through an annual school capacity survey, which is the basis of capital funding allocations granted to local authorities by the Department for Education. Surplus school places are carefully managed to ensure that schools do not become unviable through insufficient numbers of pupils (generating per-pupil revenue funding) compared to the numbers of teachers and the size of the school to be maintained. Serious over-estimation of education need can lead to the closure of schools, and it is essential that forecasts of need are based on evidence-based pupil yield calculations and a degree of certainty over anticipated population and housing growth.
7. Torbay Borough Council’s pupil yield assumptions rightly take account of the demographic profile in the area, both in the existing population and resulting from in-migration. The ESFA recommends the removal of text in the Neighbourhood Plan that advocates over-provision of school places, focusing instead on matching defined need with school provision (in accordance with Policy L2) based on appropriate evidence to allow the provision of high quality education.

### **Conclusion**

8. Finally, I hope the above comments are helpful in finalising the Brixham Peninsula Neighbourhood Plan, with specific regard to planning for schools. Please advise the ESFA of any proposed changes to the emerging policies, supporting text, site allocations and/or evidence base arising from these comments.
9. Please notify the ESFA when the Neighbourhood Plan is submitted for examination, the Inspector’s report is published and the plan is adopted/made. At present, the ESFA does not intend to attend the examination.
10. Please do not hesitate to contact me if you have any queries regarding this response. The ESFA looks forward to continuing to work with the Brixham Peninsula Neighbourhood Forum.

Yours faithfully,



**Liz Pickering MRTPI**  
Forward Planning Manager

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