

## 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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**Our Ref: ESFA/Neighbourhood Plan/Paignton 2017**

15/12/17

Dear Sir/Madam,

**Re: Paignton 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 Torquay and Brixham Peninsula Neighbourhood Plans; those representations may also be relevant to the Paignton 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, including its supporting evidence of housing need and demand, was subject to examination in 2015 and found sound.

5. The Local Plan sets a strategic target of 4,290 homes to be built in the Paignton area by 2030. Paragraph 3.14 of the Paignton Neighbourhood Plan claims there is no requirement for the Neighbourhood Plan to allocate land, in view of low housing starts and completions against the Local Plan trajectory, and rising numbers of homes vacant for more than 6 months. The Neighbourhood Plan interprets this as an over-supply of housing. The ESFA is concerned that there is no evidence of a comprehensive review of the area's OAN to support this position.
6. Therefore, at present, the Neighbourhood Plan is not considered to be in conformity with the Local Plan, because the sole reliance on windfall developments will undermine Torbay Borough Council's ability to plan strategically for infrastructure. Plan-led housing development through site allocations allows for strategic planning and delivery of new schools, for which there is an identified need in Paignton. Indeed, this need has arisen quicker than was anticipated in 2014 when the Local Plan was examined. The Department for Education has approved two free schools in Paignton and is actively seeking sites to deliver the schools.
7. A robust search for sites has been carried out in response to this identified need for delivery of a primary school in Paignton. As the Local Plan has entrusted site allocations to Neighbourhood Plans, the Paignton Neighbourhood Plan should plan for education provision over the plan period, identifying available and suitable land in the catchment areas where school places are needed. These may be standalone sites or part of housing developments, but the Neighbourhood Plan should assess the needs and opportunities for education provision alongside other forms of infrastructure, and safeguard land accordingly.
8. Due to a shortage of suitable and available sites, the ESFA (and its agents) are considering potential solutions for sites which may be undersized in relation to the standard (BB103). A flexible and creative approach may need to be employed in this case, for instance by looking at the potential for detached playing fields or sports facilities, and possibilities for offsite parking, travel plans and multi storey buildings. All efforts will be made to ensure that children's educational experience is not compromised, but the need to deliver additional school places is pressing and must be addressed.
9. The ESFA would be happy to meet with the Neighbourhood Forum to discuss pipeline school projects in Paignton and potential site allocations that could be incorporated through a modification, or modifications, to the plan.

## **Conclusion**

10. Finally, I hope the above comments are helpful in finalising the Paignton Neighbourhood Plan, with specific regard to the provision of land for new 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.
11. Please notify the ESFA when the Neighbourhood Plan is submitted for examination, the Inspector's report is published and the plan is adopted/made. The ESFA may wish to present evidence at the examination hearings, depending on the outcomes of any discussions or modifications put forward.

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 the Paignton Neighbourhood Forum.

Yours faithfully,



**Liz Pickering MRTPI**  
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