Dear Sir/Madam,

Please find attached a copy the Education and Skills Funding Agency’s response to the Rushcliffe Local Plan (Part 2) consultation. Please accept my apologies for missing the consultation deadline by a couple of days, I hope you will still be able to consider our response. I would be grateful if you could confirm if our response will be considered.

Yours faithfully,

John Pilgrim

John Pilgrim
Forward Planning Manager (North), Free Schools Capital
Education and Skills Funding Agency
Department for Education
Mobile:
Web: www.education.gov.uk
Our Ref: ESFA/Rushcliffe Borough Council Local Plan (Part 2) /June 2018

3rd July 2018

Dear Sir/Madam,

Re: Rushcliffe Borough Council Local Plan Part 2: Land and Planning Policies Publication Version

Consultation under Regulation 22 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.

The ESFA responded to the consultation to the Local Plan Part 2 that was held in October/November 2017. Further to our comments on the Reg 19 version of this document, please see below the ESFA’s comments on the latest iteration of the plan.

Comments on the Local Plan Part 2: Land and Planning Policies

2. 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.

3. The ESFA supports the Council’s allocation and safeguarding of land for schools as set out in the following policies:

   • ‘Policy 3 Housing Allocation – Land North of Remptstone Road, East Leake. The development will be subject to the following requirements: a) if required, a serviced site within the north of the allocation should be provided for a new primary school; b) appropriate financial contributions for new primary school…provision where necessary.’

   • ‘Policy 5.3 Housing Allocation – Land OFF Shelford Road, Radcliffe on Trent. The development will be subject to the following requirements: a) a serviced site(s) within the north of the allocation should be provided
for a new one form entry primary school and medical centre.’ Whilst the ESFA supports the allocation of land for the provision of a new school, our general preference is for new primary schools to be two form entry schools, as previous experience has shown these to be more viable in the long term.

- **Paragraph 3.13 Housing Allocations at Cotgrove** states that ‘...further improvements to local facilities (e.g. primary schools) will be necessary to enable more development to take place’. We noted that this was an issue within our response to the Regulation 19 consultation. We think the clarity of the Plan would be increased by indicating more clearly, how the additional demand for school places at Cotgrove will be met. This would ensure greater consistency with other policies within the Plan, for example, **Policy 3 Land North of Rempstone Road, East Leake**, which indicates where a new school will be provided to meet the additional demand generated by this housing allocation, and highlights the need for a financial contribution to meet additional need.

- Further to our comments, during the Reg 19 consultation, concerning the lack of detail regarding the locations for new schools, we welcome the additional detail provided with the latest version of the document (**Page 8 Local Plan Objectives**) which provides some welcome additional information in this regard.

- The **Infrastructure Delivery Plan** for the Local Plan Part 2 (May 2018) the level of provision that will provided to meet demand in Clifton South and that this additional provision will be funded by a combination of S106 and direct provision. It would also be helpful if the Plan could alongside the provision highlighted in the IDP safeguard specific areas of land for the provision of these new schools.

### Forward Loan Fund

4. In light of **Housing Allocation – Land North of Rempstone Road, East Leake** and **Housing Allocation – Land OFF Shelford Road, Radcliffe on Trent**, emerging ESFA proposals for forward funding schools as part of large residential developments may be relevant, for example if viability becomes an issue. The ESFA aims to be able to clarify forward funding options for schools in Autumn 2018. We would be happy to meet to discuss this opportunity further once the options have been finalised and if/when relevant. Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of schools where and when they are needed.

### Developer Contributions and CIL

5. 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 a CIL Draft Charging Schedule was consulted on in March 2017. We also recognise that the Council does not intend to use CIL to fully replace Section 106 planning obligations, but that ‘once CIL has been adopted all developments that commenced after the adoption date may be liable to pay the new levy.’. The
ESFA supports the Council’s approach to ensure developer contributions address the impacts arising from growth, and we welcome the inclusion of Primary School Provision within the Draft Regulation 123 List.

**Conclusion**

6. Finally, I hope the above comments are helpful in finalising Rushcliffe borough’s Local Plan, with specific regard to the provision of land for new schools.

7. Please notify the ESFA when the Local Plan is submitted for examination, the Inspector’s report is published and the Local Plan is adopted.

8. Please do not hesitate to contact me if you have any queries regarding this response. The ESFA looks forward to continuing to work with Rushcliffe borough to develop a sound Local Plan which will aid in the delivery of new schools.

Yours faithfully,

J Pilgrim

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