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Date: 03/09/2020

Dear Sir or Madam,

Partial Review of the Fylde Local Plan to 2032

Thank you for consulting the Council on the above planning document. I provide the following comments and hope they are of assistance. It should be noted that given the Council's response to the Covid-19 epidemic some departments have not been able to review or comment on the consultation documents.

Education

Section 14 of the Education Act 1996 dictates that Lancashire County Council's statutory obligation is to ensure that every child living in Lancashire is able to access a mainstream school place in Lancashire. The School Place Provision Strategy provides the context and policy for school place provision and schools capital strategy in Lancashire. Over the coming years, Lancashire County Council and local authority partners will need to address a range of issues around school organisation in order to maintain a coherent system that is fit for purpose, stable, and delivering the best possible outcomes for children and young people.

Pressure for additional school places can be created by an increase in the birth rate, new housing developments, greater inward migration and parental choice of one school over another. If local schools are unable to meet the demand of a new development there is the potential to have an adverse impact on the infrastructure of its local community, with children having to travel greater distances to access a school place.

The School Planning Team produces an Education Contribution Methodology document which outlines the Lancashire County Council methodology for assessing the likely impact of new housing developments on school places, where necessary mitigating the impact, by securing education contributions from developers.

The Department of Education has produced new guidance updated November 2019

Non-statutory guidance for local authorities planning for education to support housing growth and seeking associated developer contributions, November 2019.

This guidance and its purpose enables the local authority with the education responsibility to evidence the need and demand of school places new housing development will have on community infrastructure, including education

The evidence supplied through the planning process will identify the impact, and set out the mechanisms for securing developer contributions required to mitigate their impact.

The guidance promotes good practice on pupil yield evidence, engagement with local planning authorities and the delivery of expanded or new schools with funding from housing development.

Further information and details regarding the new guidance can be found by using the link <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>

In order to assess the impact of a development the School Planning Team consider demand for places against the capacity of primary schools within 2 miles and secondary schools within 3 miles. These distances are in line with DfE travel to school guidance and Lancashire County Councils Home to School Transport Policy.

Planning obligations will be sought for education places where Lancashire primary schools within 2 miles and/or Lancashire secondary schools within 3 miles of the development are:

- Already over-subscribed,
- Projected to become over-subscribed within 5 years, or
- A development results in demand for a school site to be provided.

Please be aware the Education Contribution Methodology document only seeks to achieve contributions for primary and secondary age pupils. Although Early Years and Specialist Education Needs and Disabilities (SEND) may share the same sites and facilities with mainstream pupils the mechanisms for claiming contributions are dealt with separately.

Please note The Place Provision Strategy and Education Contribution Methodology document are currently under review from The School Planning Team.

Alongside the mainstream education reviews the SEND Provision Strategy is currently going through the review process. Elected members are expected to receive a report August 2020, however with the Covid 19 pandemic there may be some disruption to the timescale for all of the above reviews.

Response to the consultation

The changes to National Planning Policy Framework NPPF 2019 has resulted in an early review of the councils adopted Local Plan. The amendments suggest potential changes to the overall delivery of new housing across the district, plus the potential requirement to meet the unmet housing need of Wyre Borough Council. It is unclear at this point if Wyre Borough Council through a review of their adopted Local Plan will meet the unmet need across their own district. We will work closely with Wyre Borough Council when they advise a review of their adopted plan will take place and provide detailed information.

The School Planning Team work closely with all Lancashire District Councils providing advice and guidance regarding the impact new housing has on the provision of mainstream education. To enable us to forecast the five year position we rely on the district to provide information of their five year housing land supply annually. This information is used alongside national statistics such as the birth rate to forecast the likely need for additional school places within a specific planning area. This level of information is presented at district liaison meetings with Fylde planning officers and elected members as part of the duty to cooperate between the District Councils and upper tier County Council. This information is intended to assist planning officers to plan where housing growth will be and the infrastructure required.

The partial review information provides headline figures of new housing, however it does not provide detail of the specific planning areas and where any potential unmet Wyre housing will be delivered. At a point in time it would be appreciated if detailed information could be provided by Fylde the changes in housing delivery and the specific planning areas. The School Planning Team in return will advise which specific planning areas require further review and investment of additional pupil places. This level of detail can be applied to the districts Infrastructure Delivery Plan documents advising residents of the level of all infrastructure to meet the demand of new housing.

To accompany the partial review the council has engaged with a number of professional bodies to provide expert reports, this includes ECONOMIC VIABILITY ASSESSMENT REVIEW undertaken by Keppie Massie.

The following has been extracted from the Keppie Massie report

5.2 A revised NPPF was published in July 2018 (NPPF18) and a further version with minor changes was published in February 2019 (NPPF19). NPPF19 states that:

“Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as the need for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the delivery of the plan.” (para 34).

Developer contributions to mitigate the impact new housing on all areas of infrastructure, including education is crucial to ensure the right number of school places are available at the right time. With the level of basic need funding from the government to cover the county reducing, the need for developer contributions is vital to ensure places are available and the development is successful and meets the needs of its residents and surrounding community.

The contribution will be determined by the Education Contribution Methodology Document, the expectation will be on Fylde Borough Council to secure the required financial contributions from developers as part of the application process.

If Fylde BC consider there to be viability issues with the required education contributions, The School Planning Team request the earliest opportunity to discuss the matter further with Fylde BC Planning Officers. Following discussions, if there is not a satisfactory conclusion Lancashire County Council would be minded to submit an objection to the planning application as we would not consider the application to be sustainable.

It is noted from the consultation document SDPR07 Draft Statement of Common Ground has been produced between the District Councils of Fylde, Wyre, Blackpool and Lancashire County Council. As mentioned previously the School Planning Team has engaged with the council through the liaison meetings to update and discuss development across the planning area. However there has been a number of differing opinions and the approach of need, and funding required to deliver education places across the district. We hope these issues will be addressed within the review and the new Government guidance.

The School Planning Team has demonstrated a commitment to working with the districts at all levels to ensure information is shared at the appropriate time, and provide commentary on housing development an impact on education either face to face or through consultation response direct using the Lancashire County Council One Council response process

The School Planning Team would like to thank Fylde Borough Council for the opportunity to respond to the Local Plan Review and look forward to working with and receiving further information in the near future, and continued collaborative working.

Yours Faithfully,

A handwritten signature in black ink, appearing to read 'MH', with a long horizontal stroke extending to the right.

Marcus Hudson
Head of Planning

