

Our Ref: DfE/Solihull Local Plan Draft Submission Plan/October 2020

14 December 2020

Dear Sir/Madam,

Re: Solihull Local Plan – Draft Submission Plan

Consultation under Regulation 19 of Town and Country Planning (Local Planning) (England) Regulations 2012

Submission of the Department for Education (DfE)

1. We welcome the opportunity to contribute to the development of planning policy at the local level.
2. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and DfE is the delivery body for many of these, rather than local education authorities. However, local education authorities still retain the statutory responsibility to ensure sufficient school places, including those at sixth form, and have a key role in securing contributions from development to new education infrastructure. In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. We have published guidance on education provision in garden communities and securing developer contributions for education, at <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>. You will also be aware of the corresponding additions to Planning Practice Guidance on planning obligations, viability and safe and healthy communities.
3. We would like to offer the following comments in response to the above consultation document.

Soundness

4. 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 DfE's view of the plan's soundness in respect of education provision.
5. The department makes the following comments on **Policy BC1 – Barratt's Farm, Balsall Common** :

- We welcome the fact that this policy highlights the need for a new two form entry primary school and the need for a financial contribution towards the provision of additional secondary school places. The policy could be made clearer by indicating how the primary school will be funded, in addition to reference made to funding in paragraph 531 of the supporting text. The developer(s) should meet the cost of providing places in accordance with the pupil yield generated by the development, and we recommend that this includes provision of a suitable site as well as the funds needed to build the school. This would help to make **Policy BC1 Barratt's Farm** consistent with **Policy BL3 – Whitlock's End Farm** and **Policy KN2 – South of Knowle**, which both state that developer contributions will be sought for the provision of a new primary school.
 - The Barratt's Farm Masterplan (January 2019) indicates the broad location for the primary school, it would also be helpful if Policy BC1 could indicate the number of hectares of land that will be safeguarded for the school, to help ensure the new school meets the DfE's requirements as set out in [Building Bulletin 103](#). Identifying and safeguarding a site for the proposed school is essential bearing in mind the land assembly issues highlighted in paragraph 541 of the local plan. In addition, the policy should include information on the key trigger points for the delivery of the primary school and the provision of funding for secondary school places. These amendments to the plan would help to improve the soundness of the plan.
6. The changes suggested to the above-mentioned policy will help to ensure that the delivery requirements are clear and that the plan is positively prepared and 'effective'.

Evidence base

- 7 We welcome the reference made with the Solihull Infrastructure Delivery Plan (2020) (page 77) to the DfE's Education Contributions Guidance. Bearing in mind the high number of both primary and secondary age pupils from outside the borough that attend Solihull schools, there will be a need to ensure close working with neighbouring local authorities to ensure this guidance is implemented effectively.
8. It would be useful if a Planning for Schools topic/background paper could be produced, expanding on the evidence in the Council's Infrastructure Delivery Plan (2020) and the School Organisation Plan (2018/19), 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 that the approach to the planning and delivery of education infrastructure is justified based on proportionate evidence.
9. Given the significant cross-boundary movement of school pupils between Solihull borough and adjoining areas, DfE recommends that the Council covers this matter and the outcomes of cooperation to address it as part of its Statement of Common Ground.¹

¹ NPPF paragraph 27; and the PPG on Plan-Making - <https://www.gov.uk/guidance/plan-making#maintaining-effective-cooperation>

Conclusion

10. Finally, I hope the above comments are helpful in finalising Solihull's Local Plan, with specific regard to the provision of land and developer contributions for new schools.
11. DfE is currently supporting the delivery of new free schools within Solihull, and we wish to continue working closely with Solihull in the process of site selection and the delivery of new schools. Please notify the department 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. DfE looks forward to continuing to work with Solihull to develop a sound Local Plan which will aid in the delivery of new schools.

Yours faithfully,

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