

London Borough of Southwark Response

Examination of the New Southwark Plan

Inspectors' Matters, Issues and Questions

Matter 4 - Education and the best start in life

Issue 1

Whether the Plan has been positively prepared and whether it is justified, effective, consistent with national policy and in general conformity with the London Plan in relation to education and the best start in life.

Relevant Policies – SP3, P26

Policy SP3 – Best Start in Life

Question 4.1

Taking each criterion in turn, are they justified and supported by evidence?

1. The evidence for SP3 Best start in Life is set out in document SP301 - Southwark Primary and Secondary School Place Planning Strategy Update (2017) and document SP302 - Southwark Pupil Place Planning (2019).
2. Strategic policies are borough wide policies which set out the council's regeneration strategy to work with local people to improve neighbourhoods and create new opportunities for the future. They are also used to set the context for our detailed planning policies and to make planning decisions.
3. The National Planning Policy Framework (NPPF) sets out in paragraph 20 (C) of that:

“strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for community infrastructure (such as health, education and cultural infrastructure)”.
4. SP3 Best Start in Life therefore sets out the regeneration strategy to improve the lives of children and young people in Southwark.
5. SP3 Best Start in Life criterion one sets out that a Best Start in Life for all young people will be achieved through:

“Offer our young people and families, including those who are more vulnerable or have special educational needs, the right support at the right time”

6. This criterion is justified because there is an anticipated and identified need to provide education facilities for those who are more vulnerable and have specialist needs. The report Southwark Pupil Place Planning (document SP302) sets out major efforts to expand and enhance Southwark’s Special Educational Needs or Disabilities provision. Including the delivery of a new Special School.

7. SP3 Best Start in Life criterion two sets out that a Best Start in Life for all young people will be achieved through:

“Delivery more childcare, school places and double the number of Southwark Scholarships;”

8. The report Southwark Pupil Place Planning (document SP302) set out that in 2016-2019 Southwark did not receive any basic needs funding as there is sufficient space within our schools presently to accommodate pupils. LB Southwark does not expect any Basic Needs funding for primary schools for the foreseeable future. This policy is therefore justified and supported by evidence in ensuring that the identified need continues to be met and that additional resources are used to support facilities for those with specialist needs.

9. Southwark Scholarships Initiative started in 2011 and has since helped 99 young people pursue higher education on the Southwark Scholarship Scheme. The scholarship award covers the full cost of tuition fees for their chosen university course.

10. SP3 Best Start in Life criterion three sets out that a Best Start in Life for all young people will be achieved through:

“Delivering a top-quality children’s playground in every local area;”

11. The Southwark Playing Pitch Strategy (20126) (document SP603) responds to an identified need in Southwark for more and improved quality play spaces and sports pitches for local residents. This criterion sets out the commitment to delivery playscape is which is reflected in the Council’s wider regeneration strategy. The Evidence Base for the NSP, as set out in the IIA (document EIP72) and IIA appendices (EIP72A). There is an identified need for play space and green space as set out in the IIA and appendices.

12. There is an identified need in Southwark to address inequality, especially for children and young people, particularly in relation to health and education. The

criterion in this policy set out how regeneration in Southwark will seek to address this.

13. The criteria four to seven are interventions made in the Council-wide regeneration strategy. Planning policy and financial contributions supports the delivery of this strategy in partnership with the wider Council.
14. The Pupil Place Planning Report for 2020 (document EIP167) sets out the pupil planning strategy for Southwark. LB Southwark currently has sufficient pupil places to meet existing demand in both primary and secondary phases of education in Southwark.
15. With regard to primary school place provision, the report (document EIP167) sets out that the GLA projections anticipate that primary reception demand overall will continue to decline until September 2023. It is anticipated from these projections that demand will increase thereafter, and unless action is taken exceed capacity from September 2028 onwards. The 2019 report (document SP302) stated that the demand for primary reception place was projected to exceed supply in September 2030, as a result of the release of 2018/19 housing figures accrued from development at Canada Water and Old Kent Road primary reception place is now expected to exceed supply in September 2028, which is two years earlier.
16. With regard to secondary school place provision, the report (document EIP167) sets out that LB Southwark is anticipating secondary school place demand will remain steady and increase slowly from 2029 onwards. It is not anticipated that borough wide secondary capacity will be exceeded by demand at present. Currently, the number of applicants is decreasing. The 2019 report (document SP302) set out that secondary school roll projections would not exceed supply between now and September 2032. Now it is not expected that secondary year 7 supply to be exceeded by demand in the next 12 years. It is not expected that secondary year 7 supply will be exceeded by demand until September 2034.
17. In response, a review of Place Planning is underway by LB Southwark to plan for increased demand, as set out in paragraphs 7 to 10 of the 2020 Pupil Place Planning Report (document EIP167).
18. The Infrastructure Background Paper (document SP201) sets out the justification and evidence for the planning and delivery of school places in paragraphs 3.17 to 3.43.

Question 4.2

Is the policy necessary for soundness?

1. Yes, strategic policy SP3 Best Start in Life is necessary for soundness.
2. Strategic policies are borough wide policies which set out the council's regeneration strategy to work with local people to improve neighbourhoods and create new opportunities for the future. They are also used to set the context for our detailed planning policies and to make planning decisions.
3. SP3 Best Start in Life sets out the regeneration strategy in relation to children and young people to ensure that all Southwark residents have the best start in life. This encompasses the provision of access to education, sports and recreation, leisure open space, play space access to family support, libraries and early education. SP3 Best Start in Life sets out a strategy to ensure that families can choose to live in Southwark. SP3 Best Start in Life puts young people at the heart of the plan.
4. It is necessary to take into account the needs of young people and their educational opportunities, and meet the need for the provision of services and education for young people through the avenues available in planning, for example financial contributions for school places and design of schools.
5. This policy is positively prepared, effective, justified and compliant with national policy.

Policy P26 – Education Places

Question 4.3

Is the policy overall justified, effective and consistent with national policy?

1. Yes, policy P26 Education Places enables the delivery of the Council's agreed strategy for the provision of state funded school places in the borough. P26 Education Places is justified and supported by evidence.
2. Policy P26 Education Places is justified because the strategy to deliver school places in Southwark will meet the need for school places in Southwark, as set out in Southwark Pupil Place Planning (document SP302).
3. Policy P26 Education Places is effective because it is deliverable over the plan period. The evidence base demonstrates working on cross-boundary strategic matters internally within the Council to ensure that the need for school places is

met for current and future pupils. The Southwark Pupil Place Planning (document SP302) demonstrates where steps have been taken to expand existing schools and open new schools to meet demand, and predict where there may be potential for shortfall and plans to address it.

4. The evidence for P26 Education places is set out in document SP301 - Southwark Primary and Secondary School Place Planning Strategy Update (2017) and document SP302 - Southwark Pupil Place Planning (2019).
5. The National Planning Policy Framework (2019) sets out in paragraph 94 (a) that:

“it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. They should give great weight to the needs to create, expand and alter schools, and paragraph 94 (b) sets out that they should work with school promoters, delivery partners and statutory bodies.”

6. The Publication London Plan (2010) in Policy S3 Childcare and Education facilities in paragraph A that development plans should:

“to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice.”

7. Policy P26 Education Places is policy compliant with national and regional policy as it ensures that school places are delivered on the basis of population projections generated from population and migration data and the location of new development. This is undertaken in consultation with the GLA and Department of Education as set out in Evidence Base (document SP301).

Question 4.4

Taking each criterion in turn, are they justified and supported by evidence?

1. P26 Education places is justified and supported by evidence.
2. The evidence for P26 Education places is set out in document SP301 - Southwark Primary and Secondary School Place Planning Strategy Update (2017) and document SP302 - Southwark Pupil Place Planning (2019).
3. The Evidence Base document Southwark Primary and Secondary School Place Planning Strategy Update (document SP301) sets out in Appendix D a detailed strategy for the methodology for the approach to Primary and Secondary School Place Planning in Southwark based on a number of factors including GLA population projections, the location of new housing developments and other

population and demographic. This allows LB Southwark to plan to meet the demand for school places in the borough to aim to ensure that all children and young people are able to access education in their local area.

4. The Evidence Base document Southwark Pupil Place Planning (document SP302) provides an update the proposed increase of primary and secondary school planning and future plans based on more up to date population projections provided by the GLA.
5. The Pupil Place Planning Report for 2020 (document EIP167) sets out the pupil planning strategy for Southwark. LB Southwark currently has sufficient pupil places to meet existing demand in both primary and secondary phases of education in Southwark.
6. With regard to primary school place provision, the report (document EIP167) sets out that the GLA projections anticipate that primary reception demand overall will continue to decline until September 2023. It is anticipated from these projections that demand will increase thereafter, and unless action is taken exceed capacity from September 2028 onwards. The 2019 report (document SP302) stated that the demand for primary reception place was projected to exceed supply in September 2030, as a result of the release of 2018/19 housing figures accrued from development at Canada Water and Old Kent Road primary reception place is now expected to exceed supply in September 2028, which is two years earlier.
7. With regard to secondary school place provision, the report (document EIP167) sets out that LB Southwark is anticipating secondary school place demand will remain steady and increase slowly from 2029 onwards. It is not anticipated that borough wide secondary capacity will be exceeded by demand at present. Currently, the number of applicants is decreasing. The 2019 report (document SP302) set out that secondary school roll projections would not exceed supply between now and September 2032. Now it is not expected that secondary year 7 supply to be exceeded by demand in the next 12 years. It is not expected that secondary year 7 supply will be exceeded by demand until September 2034.
8. In response, a review of Place Planning is underway by LB Southwark to plan for increased demand, as set out in paragraphs 7 to 10 of the 2020 Pupil Place Planning Report (document EIP167).
9. Policy P26 Education Places criterion one sets out that a Best Start in Life for all young people will be achieved through:

“Development of educational facilities will be permitted where proposals provide pre-school, school, higher and further education places to meet identified needs

and where there are sports, arts, leisure, cultural or community facilities that are shared with local residents and all members of the community”

10. The IIA (document EIP72) sets out that the preferred Option B for the NSP will deliver benefits by securing growth in school places in paragraph 6.62. The wider council strategy to deliver improved education facilities that planning plays a role in is set out in documents listed under Education on page 52 of the IIA appendices (document EIP782A). This approach to the delivery of Education Places is therefore justified and supported by evidence.

11. Policy P26 Education Places criterion two sets out that a Best Start in Life for all young people will be achieved through:

“Development should not lead to the loss of existing educational facilities unless there is re-provision in an area if identified need or they are surplus to requirements as demonstrated by pupil or student projections”

12. The Evidence Base Southwark Pupil Place Planning (document SP302) sets out a strategy for surplus places to ensure that the current and future projected needs are met. For 2016 to 2019 there are enough Pupil Places in Southwark for residents, and this is foreseen to remain the case.

13. Policy P26 Education Places criterion three sets out that a Best Start in Life for all young people will be achieved through:

“Where additional school places for new residents are needed, new school places must be provided”

14. The Evidence Base Southwark Pupil Place Planning (document SP302) sets out how population projections and proposed new development inform the methodology that sets out whether the need for pupil places in the borough will be met. Where a shortfall has occurred previously, the report details how this predicted shortfall has been addressed and the need met.

15. There is an identified need for school places in Southwark, which is met by the pupil place planning by LB Southwark, as set out in Southwark Pupil Place Planning (document SP302).

16. Policy P26 Education Places criterion four sets out that a Best Start in Life for all young people will be achieved through:

“Development of school places must provide sufficient floor space for teaching, halls, dining, physical education, staff and administration activities, storage,

toilets and personal care, kitchen facilities, circulation, plant and any non-school or support functions such as special needs facilities. Schools must receive adequate daylight and sunlight, provide high quality and support safe, healthy travel by pupils”

17. This approach is justified to ensure that new education facilities are of high-quality design and are suited to the needs of pupils. The Evidence Base 2017 Primary and Secondary School Pupil Planning (document SP301) sets out the need for investment in schools to ensure we meet the demand for places as substantial regeneration occurs. This approach to the delivery of Education Places is therefore justified and supported by evidence. The Pupil Place Planning Report for 2020 (document EIP167) sets out an update to the 2017 and 2019 reports and sets out that Southwark continues to, where necessary, expand and enhance our Special Educational Needs and Disability (SEND) provision.
18. The Infrastructure Background Paper (document SP201) sets out the justification and evidence for the planning and delivery of school places in paragraphs 3.17 to 3.43. The background to policy P26 Education Places is set out in paragraphs 3.34 to 3.47.

Question 4. 5

How will any financial contributions towards additional school places be calculated? Is the policy sufficiently clear in this regard?

1. Financial contributions towards additional school places are secured through the Community Infrastructure Levy.
2. The Community Infrastructure Levy has replaced Section 106 Financial contributions for school places as the way in which development contributes towards providing the new infrastructure to support new development. This was enacted in Part 11 Community Infrastructure Levy by the 2008 Planning Act.
3. The above is set out in the Section 106 and Supplementary Planning Document (document EIP49). This is on page 4 and 5.
4. This policy is therefore sufficiently clear in setting out financial contributions towards school places.
5. This is compliant with national policy. The National Planning Policy Framework (NPPF) sets out in paragraph 34 that “Plans should set out the contributions expected from development...This should include ... other infrastructure (such as that needed for education)”. Policy P26 Education places is compliant with

national guidance because it sets out the contributions expected from development to fund new school places to support new development.

Question 4.6

Is the policy sufficiently clear where land transfer may be required to support the delivery of new education places?

1. This is not an issue at present that needs to be addressed in the Development Plan.
2. It is demonstrated in our evidence base (document SP301) that provisions have been made to consider land allocation and the potential for new sites to address potential shortfall in school places.
3. In the Implementation Policies chapter of the NSP, IP2 details what S106 legal agreements, Southwark Community Infrastructure Levy (CIL) and Mayoral CIL are and what they are used for. Furthermore, we have a Section 106 and CIL SPD (2015) within an Addendum (2017) that set out the council's approach to both Section 106 legal agreements and the Community Infrastructure Levy (CIL). Both of these are tools to secure investment in the borough and around development sites which is designed to offset any impact that a development will have. It is not necessary to repeat this information within the New Southwark Plan.