

**EXAMINATION OF THE GREATER NORWICH LOCAL PLAN
STATEMENT ON BEHALF OF TERRA STRATEGIC – ID 24244
LAND OFF BAWBURGH LANE, COSTESSEY**

MATTER 5 – STRATEGIC INFRASTRUCTURE

This Statement is made on behalf of Terra Strategic in respect of Land off Bawburgh Lane, Costessey. Terra Strategic control the majority of the site, with the remainder controlled by Norwich City Council, who are supportive of the development proposal and have agreed for Terra Strategic to take the lead with promotion of the Site through the Local Plan process.

The site forms a contingency allocation within the draft GNLP Sites Document as part of Policy GNLP0581/2043. This contingency site allocation is identified on Submission Policies Map – South Norfolk for approximately 800 homes plus other infrastructure including a primary school and sixth form provision.

A Promotional Document is appended to our Matter 2 Statement, which sets out how the site responds to its context, and how it could be developed within the Plan period.

Also appended here is a signed Statement of Common Ground between Terra and the Education Authority, and an Education Impact & Mitigation Assessment, prepared on behalf of Terra.

ISSUE

Is Policy 4 Strategic Infrastructure justified and effective?

QUESTIONS

- 1) Policy 4 identifies a number of transport schemes and projects and says that they will be brought forward to support the aims of the Plan. Is Policy 4 an effective policy or a statement of a number of transport infrastructure schemes and projects which may be implemented? Should these schemes or projects (or some of them) be listed in supporting text rather than in the policy?**

1.1 We have no specific comments to make besides noting that Policy GNLP0581/2043 includes a requirement for safeguarding of land for a pedestrian footbridge over the A47 (although it is not reflected in the more strategic Policy 4). The land for the footbridge is outside of our site and so this will be delivered by a third party. This principle of removing this policy requirement has been agreed with the Partnership. Accordingly, the policy is not currently sound but can be made sound with the agreed Main Modification.

1.2 As set out in our Promotional Document, our proposals will facilitate links between the site, the bridge (if and when delivered), and the surrounding area.

2) The Partnership’s response to our Initial Questions states that the Western Link Road is not necessary for the delivery of any of the proposed allocations. Should it therefore be shown on the Key Diagram?

1.3 We have no specific comments to make.

3) To what extent are the allocations in the Plan and the level of growth and development proposed across the Plan area reliant upon the implementation of the other listed schemes? For example is the provision of the A140 Long Stratton by pass necessary for the delivery of planned growth in the Plan?

1.4 Our objection is in relation to school capacity. The Plan is currently internally inconsistent and unsound in respect of the provision of education infrastructure, specifically secondary school provision. Policy 4 states:

“School capacity will be increased to provide for growth by improvements to existing schools and the provision of new schools as required, including primary schools on strategic development sites and a new high school in the North East growth area as identified in appendix 1.”

1.5 It is therefore part of the Plan to increase *inter alia* secondary school provision, in order to facilitate the minimum level of housing growth. As noted in Policy GNLP0581/2043, one of the infrastructure requirements for our site is safeguarded land for a primary school and sixth form. Terra agree to this, as reflected in the appended Statement of Common Ground with the Education Authority.

- 1.6 Our Education Impact and Mitigation Assessment¹ explores the Plan’s education requirements. On the basis of the school forecast data provided by the Education Authority, Norfolk County Council (NCC) forecasts a surplus of primary school places at the point in time when dwellings on our site could be built and occupied², with **480 places** in 2026/27 and **466 places** in 2030/31. We appreciate that this may change, particularly given the current identification of the site as a contingency allocation, which may push back completions further into the Plan period. As such, we agree to provide land for a primary school as currently requested.
- 1.7 For secondary provision, it is common ground that there will be pressure for places at **Ormiston Victory Academy** (the closest school to the client site) at the time when dwellings on our site could be built and occupied, due to an increase from a **surplus of 61 places** in 2024/25 to a **deficit of 206 places** in 2026/27 and then be a **deficit of 160 places** by 2030/31.
- 1.8 On the basis of these NCC forecasts, the pressure for places at 4 of the 5 secondary schools in the Norwich South Secondary planning area (i.e. excluding The Hewett Academy) at the same time was due to be a **deficit of 525 places** in 2026/27 and a **deficit of 328 places** by 2030/31.
- 1.9 In terms of sixth form need, on the basis of ONS population projections, from a baseline date of mid-2021 the number of for 17 and 18 year-olds living in the Norwich, South Norfolk and Broadland District areas is predicted to increase every year until 2030. Between mid-2021 and mid-2030 a 26% increase can be expected. **The demand for sixth form places is therefore expected to increase significantly in the foreseeable future.**
- 1.10 There is an unanswerable need to increase the supply of secondary school places in the Plan period to meet the current and planned need for housing. It is a clear requirement of National policy to deliver adequate education infrastructure (see NPPF 16, 20, 22, 24-27, 31 and 35).
- 1.11 Pressure for secondary school places is a key consideration for supporting growth in the Plan going forward. In recent discussions with the Education Authority, it has become apparent that an additional factor which underpins the need for additional local secondary school places is the

¹ Education Impact & Mitigation Assessment, Land off Bawburgh Lane and New Road, Costessey (EHP, 21st December 2021)

² See estimated trajectory within the Education Impact and Mitigation Assessment

likely future change from the current pattern of pupil migration between relevant local secondary school areas. This has led to an increase in pressure for places at the Ormiston Victory Academy. It is agreed with the LEA that **further expansion of secondary education provision at Ormiston Victory Academy will not be feasible unless the existing sixth form provision at Ormiston Victory Academy is relocated to another local site**. This is the clear evidential basis for a new sixth form college on our site. No other site has been identified. It is agreed (see the SOCG with the LEA) that if land is allocated and made available to the LEA (which is also agreed), the Sixth Form could be relocated, allowing for an increase in secondary school capacity at the Academy site.

- 1.12 It is important to emphasise that the proposal by the Education Authority is to relocate sixth form education provision at Ormiston Victory Academy to help ensure that there will be sufficient local secondary school places to meet the needs of existing residential development sites (including commitments in the GNLP). In our view, the evidence base³ must be updated to reflect this, as well as the compelling evidence of a likely significant growth in demand for local sixth form places during the earlier stages of the GNLP Plan period.
- 1.13 There is no new secondary or sixth form provision identified in the Plan or its supporting evidence (including the Infrastructure Needs Report) which indicates an available site that could assist with the relocation of the sixth form from Ormiston Victory Academy. **On the basis of the agreed evidence, without our site, there will be insufficient secondary and sixth form places to meet the identified growth in the Plan.** This will undermine the Plan and its objective to deliver 'vibrant, healthy, inclusive and growing communities supported by the delivery of new homes, infrastructure'⁴, as set out in our response to Matter 1.
- 1.14 Our site is currently identified as a contingency allocation, and the way in which the policy is drafted raises significant concerns about when it will be delivered. There is no policy link between the delivery of the site and the need for increased secondary school capacity. In our view, this education point is so fundamental to the soundness of the Plan that we consider the site should be a full allocation. If allocated, the site can deliver the required land to facilitate the increased capacity of the Academy. In the absence of such a proposed change, the Plan is self-evidently unsound because it fails to deliver the required education infrastructure and is contrary to NPPF 16, 20, 22, 24-27, 31 and 35.

³ Greater Norwich Infrastructure Needs Report (December 2020), page 20

⁴ Greater Norwich Local Plan Pre-Submission Draft Strategy [A1], paragraph 125

- 1.15 The new sixth form will not get delivered without the housing on this site, which has been assessed as suitable, available and developable in its identification as a contingency allocation. A comprehensive development is required to ensure the education provision (including primary school) is part of a masterplanned approach with the ultimate goal of delivering sustainable development which can help deliver a number of the GNLP objectives.

Suggested change

- 1.16 The evidence base (the Infrastructure Delivery Plan) must be updated to reflect the need for the sixth form at Ormiston Victory Academy to be relocated to facilitate the delivery of secondary school places. As our site is the only known available site to accommodate this, Policy 4 is unsound without a Main Modification to reflect this (alongside changes to other policies to ensure it is deliverable within the early years of the Plan). Our suggested change is underlined below.

"...

The Greater Norwich local authorities and partners including utility companies will work together in relation to the timely delivery of improvements to infrastructure, including that set out in appendix 1 and to:

- **The energy supply network including increased capacity at primary substations at Cringleford, Peachman Way, Sprowston and Earlham Grid Local and/or innovative smart solutions to off-set the need for reinforcement;**
- **Water supply and sewerage network improvements including the wastewater network at Whitlingham water recycling centre, the Yare Valley sewer and elsewhere to protect water quality and designated habitats;**
- **health care infrastructure.**

School capacity will be increased to provide for growth by improvements to existing schools and the provision of new schools as required, including:

- **primary schools on strategic development sites**
- **a new high school in the North East growth area as identified in appendix 1;**
- **sixth form provision in Costessey to facilitate additional secondary school provision at Ormiston Victory Academy.**

...”

4) Are the listed transport projects compatible with the climate change policies of the Local Plan and with national policy?

1.17 We have no specific comments to make.

5) Has the cumulative impact of the proposed level of growth on infrastructure been adequately addressed, particularly in relation to available power and water resources? Have the cross-boundary implications for this been satisfactorily addressed?

1.18 We have no specific comments to make.

6) Will there be adequate wastewater capacity to accommodate the proposed level of growth? Could this consideration either delay or restrict the delivery of allocated sites?

1.19 We have no specific comments to make.



Education Statement of Common Ground Land off Bawburgh Lane and New Road, Costessey

Client: BSL Strategic Limited

Prepared By: Oliver Nicholson, Strategy Director

Document Date: 14th January 2022

Document Version: 1-3

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- 1.1. The emerging Greater Norwich Local Plan specifies that this proposed development at Land off Bawburgh Lane and New Road, Costessey has the Site References GNLP0581 and GNLP2043.
- 1.2. Policy GNLP0581/2043 of the emerging Greater Norwich Local Plan cites a need for land for a new primary school and a new sixth form college on this proposed development:

Policy GNLP0581/2043

Land off Bawburgh Lane, north of New Road, east of the A47 (approx. 62.42ha) is identified as a contingency site for an urban extension including housing, open and play space, a local centre and education facilities. This could accommodate in the region of 800 homes.

The site will become an allocation if there are three consecutive years in which Annual Monitoring Reports show that housing completions in Greater Norwich are more than 15% below annual targets in each year and where under-delivery is the result of site specific constraints (for example there are infrastructure or ownership constraints or significant abnormal costs have been identified) preventing the delivery of committed and allocated housing sites.

More homes may be accommodated on the site, subject to an acceptable design and layout, as well as infrastructure constraints.

The development will address the following specific matters:

1. Approximately 4 hectares of the site should be safeguarded for education to provide a new primary school and a sixth form college in agreement with the education authority;
2. Provision of a new local centre on site (approx. 0.3ha) to include a convenience foodstore and three smaller units with parking provision.
3. Provision of adequate landscaping and green infrastructure.
4. Provision of a sustainable drainage system (SUDs);
5. Mitigation to address utilities infrastructure crossing the site;
6. Provision for off-site improvements to the highway network to address the impact of the development on the Longwater Junction and on New Road to ensure that the site can be adequately accessed from the A47 and A1074 and the A47 and B1108;
7. Norfolk Minerals and Waste Core Strategy Policy CS16 applies as this site is underlain by safeguarded mineral resources;
8. Preparation of a masterplan to guide the development, submitted as part of the application for planning permission.

- 1.3. The proposal by Norfolk County Council ('NCC') is to relocate sixth form education provision at Ormiston Victory Academy to help ensure that there will be sufficient local secondary school places to meet the needs of existing residential development sites. These needs are demonstrated by the current NCC school forecasts which include the impact of consented residential development sites.
- 1.4. Discussions involving Oliver Nicholson of EHP Consultants (acting on behalf of BSL Strategic Limited) and Norfolk County Council (Jane Blackwell - Place Planning Manager and Paul Harker - Senior Place Planning Officer) were held on 30th September and 6th December 2021. These parties have also exchanged email correspondence during this period.

- 1.5. In an email on 17th November 2021 NCC summarised the basis of its proposal for a new sixth form college on this proposed development as follows:

“NCC has assessed that with any further housing in this area in addition to that already planned, there will be insufficient 11-16 places at Ormiston Victory Academy. There is not sufficient forecast demand to warrant a new high school so in order to make space at Ormiston Victory Academy for additional 11-16 places it seems a reasonable suggestion to move the 6th form to a new site. Initial discussions have been had with Ormiston Academy Trust and the school and they are willing to work with NCC on a proposal.”

- 1.6. Ormiston Victory Academy is the closest secondary school to this proposed development. On the basis of the current NCC secondary school forecasts the pressure for places at Ormiston Victory Academy is due to increase from a small surplus of 61 places in 2024/25 to a deficit of 206 places in 2026/27 and then be a deficit of 160 places by 2030/31.
- 1.7. During discussions with NCC it has become apparent that an additional factor which underpins a need for additional local secondary school places is the likely future change from the current pattern of pupil migration between relevant local secondary school areas.
- 1.8. Historically there has been a pattern of secondary school pupil migration from the Ormiston Victory Academy area to Taverham High School. The demand for places at Taverham High School will increase significantly in the near future due to the impact of local residential development within the Taverham High School area. As a direct result the pattern of local pupil migration will change with fewer children from the Ormiston Victory Academy area being able to gain a place at Taverham High School. This will in turn increase the pressure for places at Ormiston Victory Academy and the need for additional local secondary school places in the Ormiston Victory Academy area.
- 1.9. Further expansion of secondary education provision at Ormiston Victory Academy will not be feasible unless the existing sixth form provision at Ormiston Victory Academy is relocated to another local site, hence the basis for NCC to seek for land for a new sixth form college on this proposed development.
- 1.10. It is agreed that 2 hectares of land for sixth form education provision will be safeguarded for education purposes and transferred to the Education Authority at nil or nominal cost. The detail of this and precise location is to be agreed with the Education Authority. If the land is made available on this basis it would allow the sixth form to relocate to this proposed development (to be delivered by or on behalf of NCC) and for NCC or an education provider to facilitate delivery of the necessary secondary school provision at Ormiston Victory Academy.

The signatures below signify agreement between the respective parties:

A handwritten signature in blue ink, appearing to read 'Oliver Nicholson', written over a dotted line.

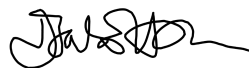
Date: 14/01/22

Name: Oliver Nicholson

(Strategy Director, EHP Consultants Ltd)

For and on behalf of

BSL Strategic Limited

A handwritten signature in blue ink, appearing to read 'Isabel Horner', written over a dotted line.

Date: 14/01/22

Name: Isabel Horner

(Sufficiency Delivery Manager, NCC)

For and on behalf of

Norfolk County Council



Education Impact & Mitigation Assessment[®]

Land off Bawburgh Lane and New Road, Costessey

Client: BSL Strategic Limited

Report By: Oliver Nicholson, Strategy Director

Document Date: 21st December 2021

Document Version: 1-1

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1. Introduction

1.1. Report Purpose & Scope

1.1.1. EHP Consultants has been asked to consider the proposed client development and other relevant developments for their likely impact on education places in the local area.

1.1.2. The purpose of this Assessment is to act as an initial point of reference for future discussions with the relevant local planning authority and local education authority regarding the requirement for education infrastructure to be included on the proposed development.

1.2. Intended Audience

1.2.1. This Education Impact & Mitigation Assessment is intended for the client team and may be shared with other parties.

1.3. Research Sources

1.3.1. The contents of this Education Impact & Mitigation Assessment are based on publicly available information, including data from central government and any relevant local planning authorities and any relevant local education authorities.

1.4. Research & Analysis

1.4.1. Research for this Education Impact & Mitigation Assessment was carried out between July and December 2021.

1.4.2. Research has been conducted regarding the current position within local schools, current local policy on developer contributions and an analysis of the most up to date forecasts regarding local education provision in the public domain.

1.4.3. Norfolk County Council ('NCC') produces school forecasts when assessing the impacts of residential development on school places.

1.4.4. Other related data information for use within this Education Impact & Mitigation Assessment was requested via the submission of Freedom of Information ('FOI') requests.

1.4.5. We also held meetings with the NCC education team in September and December 2021 to discuss the local education position and future school place planning.

1.4.6. Our commentary regarding the relevance of this data, related information and subsequent discussions with the NCC education team is set out within this Education Impact & Mitigation Assessment.

1.5. Community Infrastructure Levy Regulations

1.5.1. The Community Infrastructure Levy ('the levy') Regulations came into force in April 2010. The levy is intended to provide infrastructure to support the development of an area rather than to make individual planning applications acceptable in planning terms. As a result, there may still be some site specific impact mitigation requirements without which a development should not be granted planning permission.

1.5.2. However, in order to ensure that planning obligations and the levy can operate in a complementary way and the purposes of the two regimes are clarified, the regulations scale back the way planning obligations operate. Limitations are placed on the use of planning obligations in three respects.

1.5.3. The first of these, which is the relevant consideration in this matter, is putting the Government's policy tests on the use of planning obligations set out in Circular 5/05 Planning Obligations on a statutory basis for developments that are capable of being charged the levy.

1.5.4. The regulations place into law for the first time the Government's policy tests on the use of planning obligations. The statutory tests are intended to clarify the purpose of planning obligations in light of the levy and provide a stronger basis to dispute planning obligations policies, or practice, that breach these criteria. This seeks to reinforce the purpose of planning obligations in seeking only essential contributions to allow the granting of planning permission, rather than more general contributions that are better suited to use of the levy.

1.5.5. Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms. They must be:

- a) necessary to make the development acceptable in planning terms; and
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

1.5.6. The above tests are set out as statutory tests in [regulation 122](#) (as amended by the 2011 and 2019 Regulations) and as policy tests in the National Planning Policy Framework at [paragraph 57](#). These tests apply whether or not there is a levy charging schedule for the area.

1.5.7. From 1st September 2019 revised regulations came into force and these, amongst other things, introduced a requirement on CIL charging authorities to produce an annual statement regarding sums received both through CIL and planning obligations.

1.5.8. These regulations also removed the limit of pooling no more than 5 planning obligations towards one item of infrastructure, which had been a particular issue with regards to the provision of education infrastructure.

1.6. Department for Education Guidance on Planning Obligations

1.6.1. In April 2019 the Department for Education ('DfE') published a non-statutory guidance document titled "Securing Developer Contributions for Education". This guidance was updated by the DfE in November 2019.

1.6.2. This DfE document is non-statutory guidance for local authorities regarding seeking planning obligations towards education provision from residential development.

1.6.3. Whilst this DfE document is non-statutory, it is important to consider elements of this guidance as they would carry some weight in a planning context.

1.6.4. The purpose of the DfE guidance is underpinned by four principles, as set out below:

- Housing development should mitigate its impact on community infrastructure, including schools;
- Pupil yield factors should be based on up-to-date evidence from recent housing developments;
- Developer contributions towards new school places should provide both funding for construction and land where applicable, subject to viability assessment when strategic plans are prepared and using up-to-date cost information;
- The early delivery of new schools within strategic developments should be supported where it would not undermine the viability of the school, or of existing schools in the area.

[Source: DfE Securing Developer Contributions for Education (November 2019), at Appendix EHP01].

1.6.5. However, it should be noted that nothing within this non-statutory guidance supersedes the tests set out in section 1.5 above.

2. Setting the Context for Local School Place Planning

2.1. Norfolk County Council's Duty to Secure Sufficient School Places

2.1.1. The site lies within the primary and secondary designated catchment areas for schools for which the local education authority is Norfolk County Council ('NCC').

2.1.2. The Education Act 1996 (as amended) provides in section 14(1):

"A local education authority shall secure that sufficient schools for providing – (a) primary education and (b) secondary education ... are available for their area".

2.1.3. The Education Act does not state it is the duty of a local education authority to ensure that there are sufficient school places at the catchment area school for all children residing within that particular school's catchment area.

2.1.4. The Education Act simply states that the education authority must provide school education appropriate to the requirements of pupils for its area. In the case of NCC that is the area defined as the county of Norfolk.

2.1.5. This duty applies in relation to all the children in the local education authority area, whether they have lived there all their lives or have just moved into a new development.

2.1.6. The residential component of the proposed development will include family housing. Family housing often includes school age children who will seek to enrol in local schools. Those schools may or may not be sufficient to accommodate these children without the need for additional capacity to be provided.

2.2. School Organisation

2.2.1. The year of entry into primary schools is known as Year R, when children are typically 5 years of age. The year of entry into secondary schools is known as Year 7, when children are typically 11 years of age, with the exception of studio colleges or university technical colleges whose year of entry is Year 10 when children will be 14 years old.

2.2.2. Education is compulsory for children up until the age of 16, equivalent to Year 11; hence there are 5 year groups at secondary school. The sixth form year groups are known as Years 12 and 13 respectively. Not all secondary schools offer sixth form education.

2.2.3. All schools have a Published Admissions Number ('PAN') which indicates the number of pupils the school can take in each year group. If this number is then multiplied by the number of year groups at the school, this gives an indicative capacity of the numbers that the school can theoretically accept.

2.2.4. School capacity is often measured in terms of forms of entry ('FE'). A single class can typically accommodate up to 30 children. The Number on Roll ('NOR') is the number of children at a school.

2.2.5. Reception is the year of entry to primary school and is often referred to as "Year R". The subsequent year groups are often referred to as "Year 1" to "Year 6" respectively.

2.2.6. As primary schools have 7 year groups, a 2FE primary school would have capacity for 420 children [*calculation: 30 x 7 x 2 = 420*]; with 1FE of primary education provision equating to 210 primary school places.

2.2.7. Similarly, as secondary schools have 5 year groups, a 6FE secondary school would have capacity for 900 pupils aged 11-16 [*calculation: 30 x 5 x 6 = 900*]; with 1FE of secondary education provision equating to 150 secondary school places.

2.3. Walking Distance to School

2.3.1. Two miles is considered the maximum reasonable statutory walking distance to school for children aged 8 and under, and three miles for those over 8 years of age, as indicated by the Department for Education in its document “Home to school travel and transport guidance” [Appendix EHP02].

2.4. Patterns of Pupil Migration

2.4.1. There is likely to be movement of children between respective schools’ catchment areas, pseudo-catchment areas (based on furthest distances of places offered), designated areas, or priority areas. This movement of children due to parental preference and other factors is often referred to as “inflow” and “outflow”.

2.5. The Role of School Forecasts in School Place Planning

2.5.1. Each Local Education Authority (‘LEA’) is obliged to provide annual school forecasts to the DfE.

2.5.2. The DfE provides detailed guidance to LEAs to help ensure that school forecasts are as accurate as possible.

2.5.3. The DfE makes the following request with regards to how LEAs treat housing developments within their forecasts:

“Housing developments can have a big impact on the demand for places in individual planning areas, or across entire local authorities.

The pupil forecasts you submit in SCAP should only include expected pupil yields from housing developments that have a high probability of being delivered within the timeframe of the forecasts. In most cases such developments will have full planning permission. If you believe a development that does not have full planning permission will proceed and will yield pupils within the forecasts timeframe, we expect that development to be present in the relevant planning authority’s latest 5 year land supply. Wherever this is the case we may test the suitability of inclusion of such housing developments in SCAP forecasts by reviewing evidence on the site’s deliverability and assessing delivery against previous 5 year land supply plans in the relevant planning authority.”

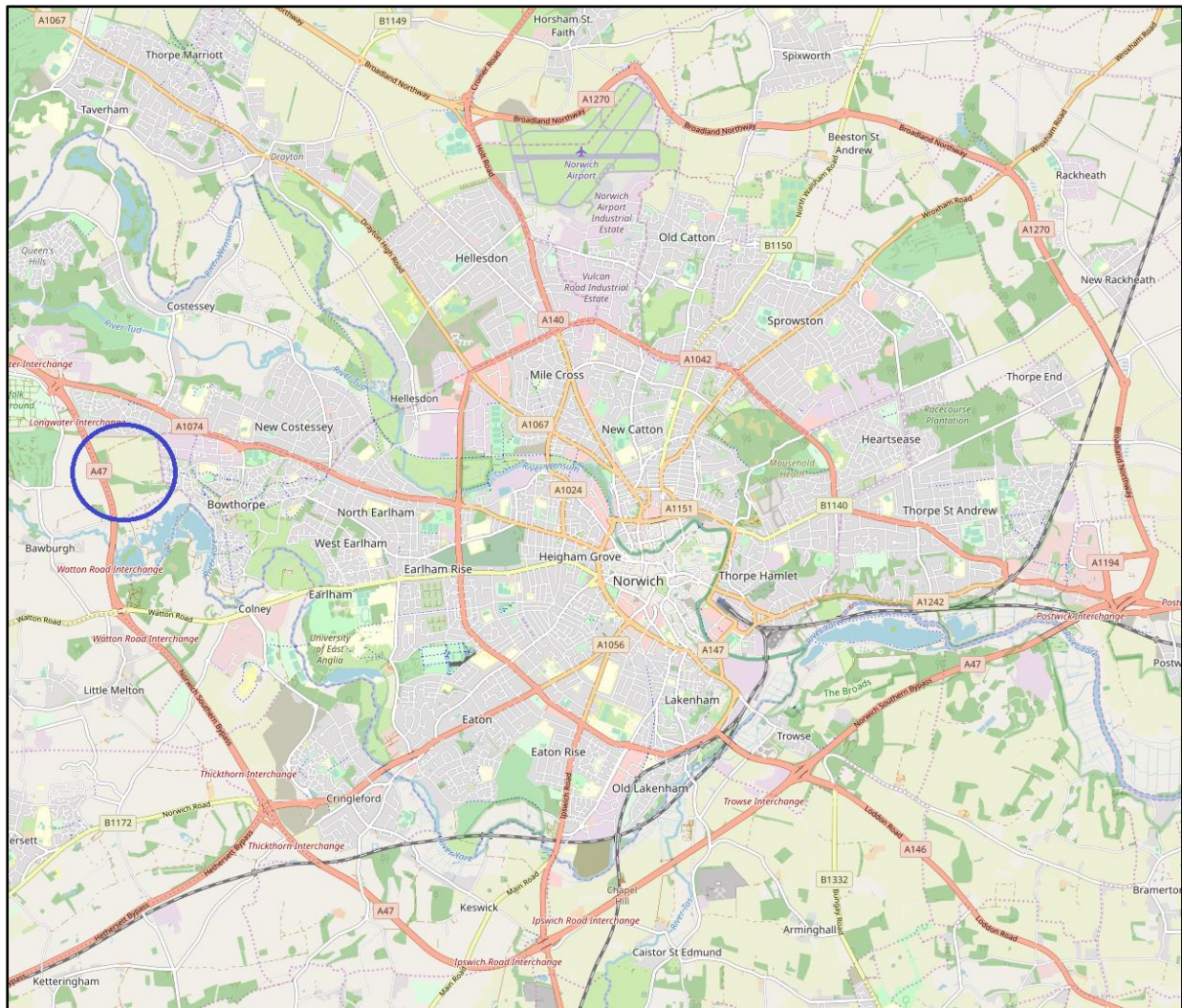
[Source: DfE - School Capacity Survey Forecast Guidance (April 2021), at Appendix EHP03]

3. The Proposed Development Site

3.1. Proposed Development Location

3.1.1. The proposed development site lies within the planning remit of South Norfolk Council ('SNC') and is adjacent to the boundary with the Norwich City Council area.

3.1.2. The approximate location of the proposed development in relation to the wider Norwich area is shown below:



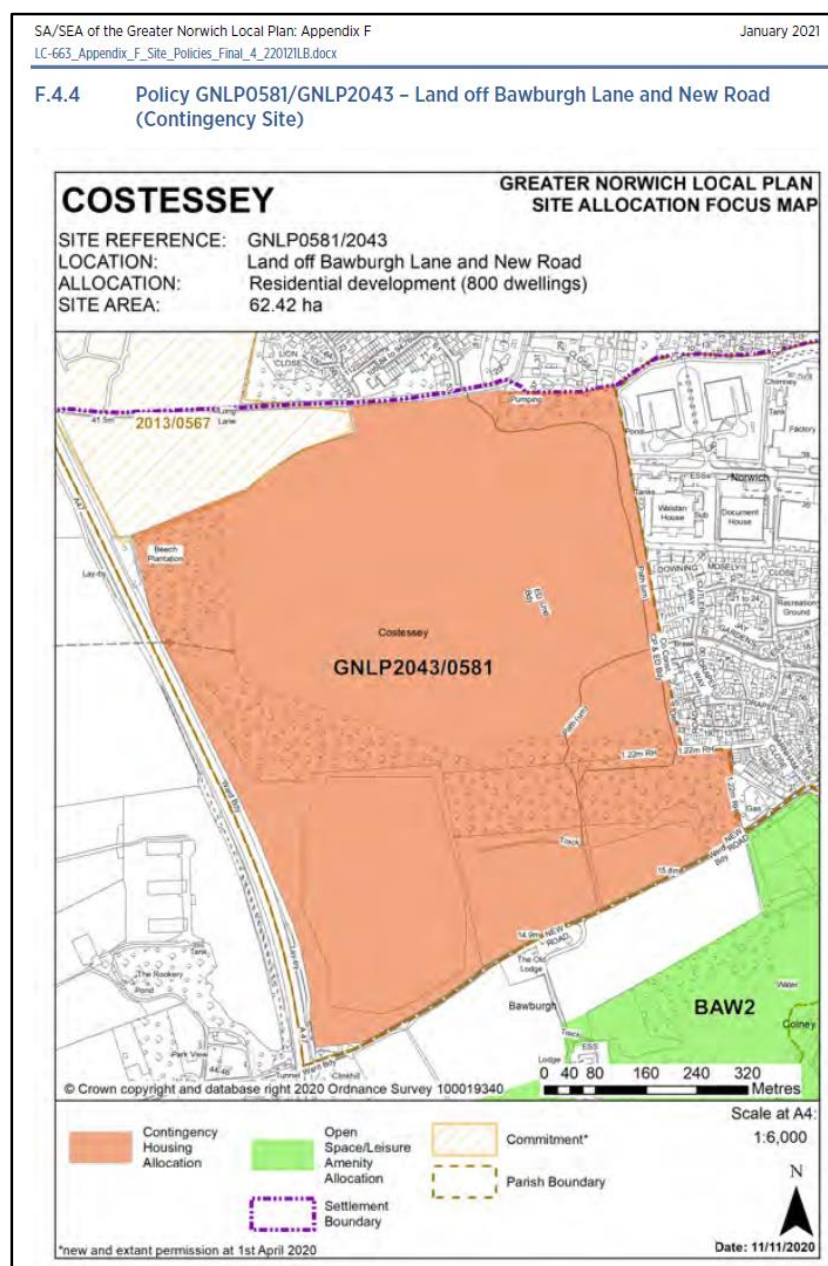
[Source: Site Location, at Appendix EHP04]

3.2. The Emerging Greater Norwich Local Plan

3.2.1. The Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan states as follows:

*“GNLP0581 Land off Bawburgh Lane and New Road
GNLP2043 North of New Road, east of A47 in Costessey and at Longwater
Sites GNLP0581 and GNLP2043 are considered together as a contingency site
for 800 dwellings should this prove to be required due to the low delivery of
sites. The site is well located on the edge of Norwich in close proximity to the
A47 Longwater Interchange and services and facilities.”*

3.2.2. The emerging Greater Norwich Local Plan map of the site is shown below:



3.3. Estimated Build Programme

3.3.1. We set out the following scenario below using a build-rate of 100 dwellings per annum and the client's estimated start date of early 2026:

Year >	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34
Proposed Development Site		100	100	100	100	100	100	100	100
Cumulative Total		100	200	300	400	500	600	700	800

[Source: Estimated build programme for the proposed development site based on current client estimates]

4. The Position at Local Schools

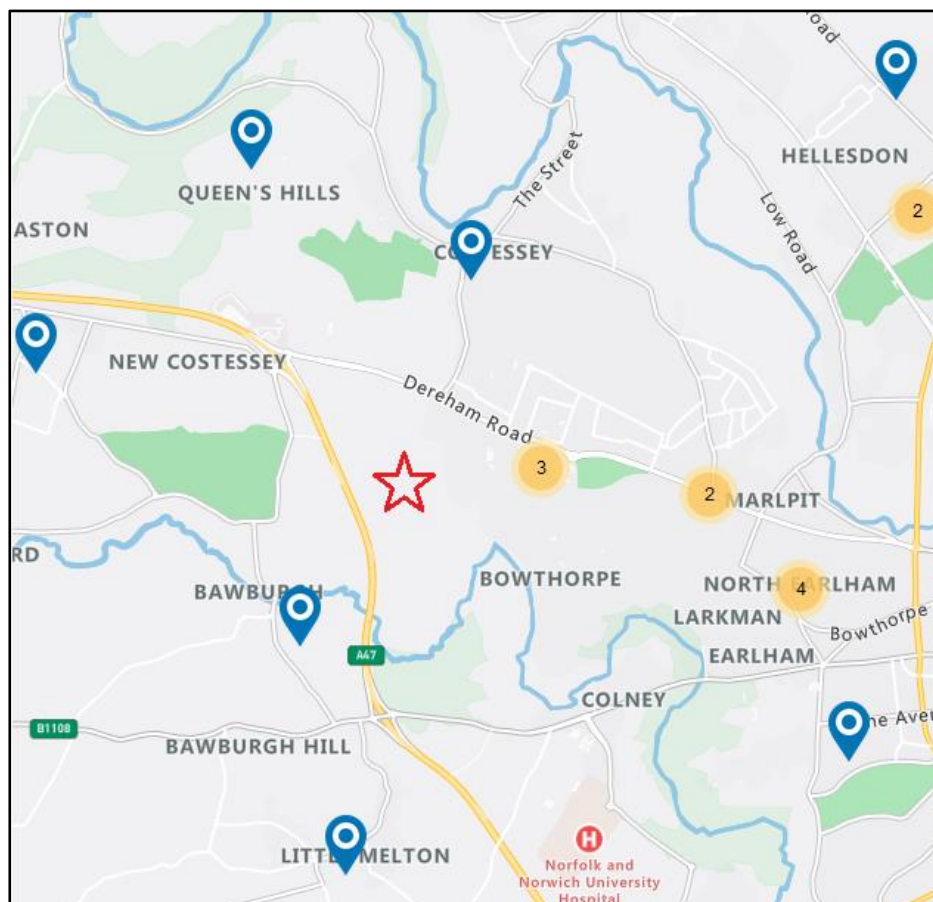
4.1. Local Primary School Locations

4.1.1. NCC would define 'Costessey and Bowthorpe Primary' as the relevant local primary school planning area for the proposed development based on the site location.

4.1.2. The Costessey and Bowthorpe Primary planning area contains the following 6 primary (including infant and junior) schools in alphabetical order:

- Chapel Break Infant School
- Clover Hill VA Infant and Nursery School
- Costessey Primary School
- St. Augustine's Catholic Primary School
- St. Michael's CE VA Junior School
- The Bawburgh School

4.1.3. The broad locations of the closest local primary schools are indicated below (any blue icons indicate single school locations, any numbered icons indicate multiple schools near the same location and the red star is an indication of the approximate location of the proposed development site):



Graphic: Primary school locations relative to the proposed development site.

[Source: DfE website]

4.2. Local Primary Schools – Forecast Status of Pupil Places

4.2.1. According to the latest available NCC school data, which was kindly provided by NCC in December 2021 following a request from EHP, the forecast position of pupil places for the 6 primary schools in the Costessey and Bowthorpe Primary planning area was due to be as shown in the Table below:

Primary School	School Capacity	NCC Forecast Children on Roll				NCC Forecast Surplus / Deficit Places			
		24/25	26/27	28/29	30/31	24/25	26/27	28/29	30/31
Chapel Break Infant School	180	166	148	152	153	14	32	28	27
Clover Hill VA Infant and Nursery School	180	149	143	144	144	31	37	36	36
Costessey Primary School	630	239	365	427	440	391	265	203	190
St. Augustine's Catholic Primary School	315	286	276	269	273	29	39	46	42
St. Michael's CE VA Junior School	480	391	398	363	337	89	82	117	143
The Bawburgh School	105	82	80	75	77	23	25	30	28
6 PRIMARY SCHOOLS	1,890	1,313	1,410	1,430	1,424	577	480	460	466

Table: Forecast position of pupil places for the 6 primary schools in the Costessey and Bowthorpe Primary planning area for selected academic years from 2024/25 to 2030/31, as provided by NCC.

[Source: School forecast data and capacity data at Appendix EHP05]

4.2.2. It is important to emphasise that the NCC primary school forecast data covers the full period from the academic year 2021/22 until the academic year 2031/32.

4.2.3. It is also important to emphasise that the NCC primary school forecast data includes the impact of any residential sites which were consented as planning applications at the time that these forecasts were prepared.

4.2.4. On the basis of these NCC forecasts for these 6 primary schools it is evident that there were a significant number of local primary school places forecast to be available in the relevant future.

4.2.5. On the basis of these NCC forecasts the surplus of places at the time when dwellings on the proposed development would be built and occupied was due to remain constant with **480 places** in 2026/27 and with **466 places** in 2030/31.

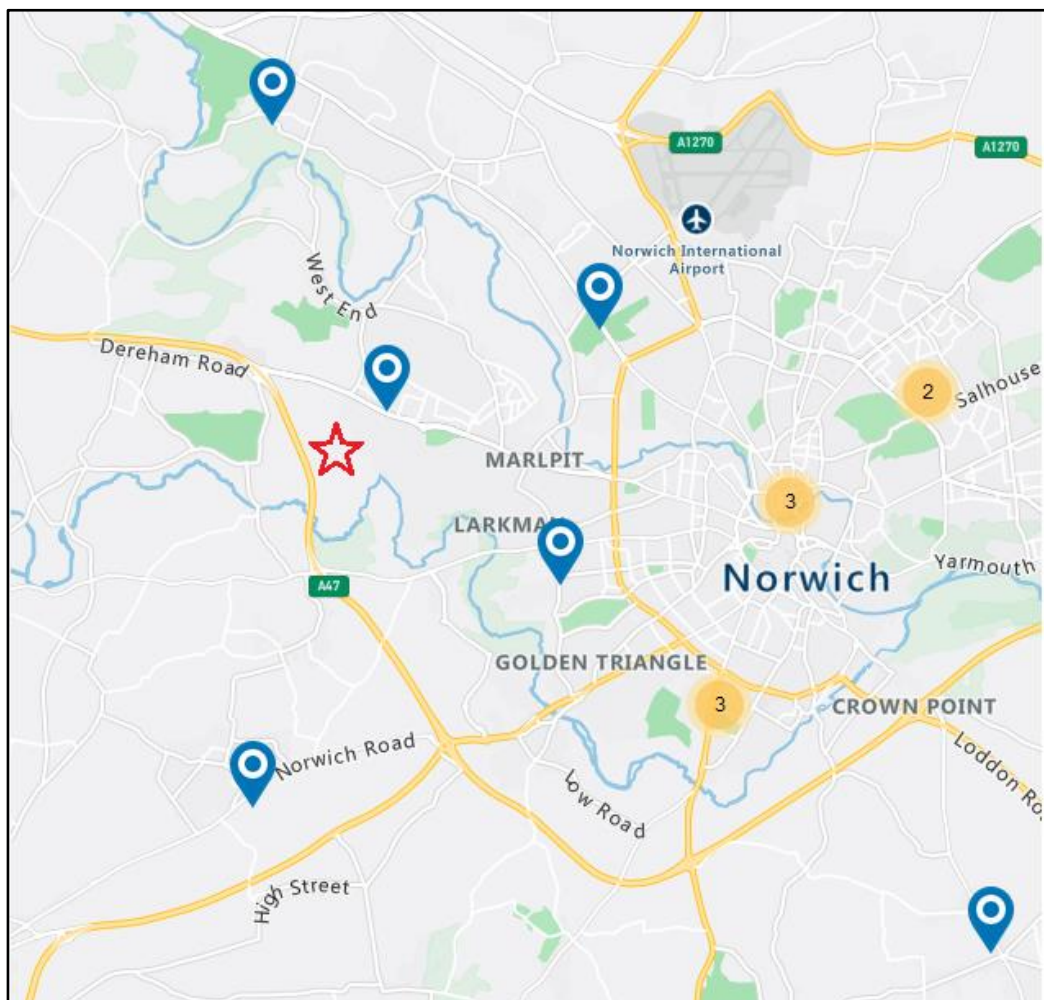
4.2.6. Further commentary regarding the demand for local primary school places and the wider implications for primary school place planning in the area is also set out later in this Assessment.

4.3. Local Secondary School Locations

4.3.1. NCC would define 'Norwich South Secondary' as the relevant local secondary school planning area and contains the following secondary schools (excluding the University Technical College, Norfolk):

- City Academy Norwich
- City of Norwich School
- Notre Dame High School, Norwich
- Ormiston Victory Academy
- The Hewett Academy, Norwich

4.3.2. The broad locations of the closest local secondary schools are indicated below (any blue icons indicate single school locations, any numbered icons indicate multiple schools near the same location and the red star is an indication of the approximate location of the proposed development site):



Graphic: Secondary school locations relative to the proposed development site.

[Source: DfE website]

4.4. Local Secondary Schools – Forecast Status of Pupil Places

4.4.1. According to the latest available NCC school data, which was kindly provided by NCC in December 2021 following a request from EHP, the forecast position of pupil places for the 5 secondary schools in the Norwich South Secondary planning area was due to be as shown in the Table below:

Secondary School (excluding sixth form)	School Capacity	NCC Forecast Children on Roll				NCC Forecast Surplus / Deficit Places			
		24/25	26/27	28/29	30/31	24/25	26/27	28/29	30/31
City Academy Norwich*	750	606	777	775	742	114	-27	-25	8
City of Norwich School	1,350	1,181	1,523	1,527	1,453	169	-173	-177	-103
Notre Dame High School, Norwich	1,050	920	1,169	1,159	1,123	130	-119	-109	-73
Ormiston Victory Academy	1,050	989	1,256	1,236	1,210	61	-206	-186	-160
The Hewett Academy, Norwich	750	323	336	338	321	427	414	412	429
5 SECONDARY SCHOOLS	4,800	4,019	5,061	5,035	4,849	901	-111	-85	101

Table: Forecast position of pupil places for the secondary school in the Norwich South Secondary planning area for selected academic years from 2024/25 to 2030/31, as provided by NCC. *This school will have a capacity of 720 until the academic year 2025/26 and a capacity of 750 thereafter; the calculations above reflect this position.

[Source: School forecast data and capacity data at Appendix EHP05]

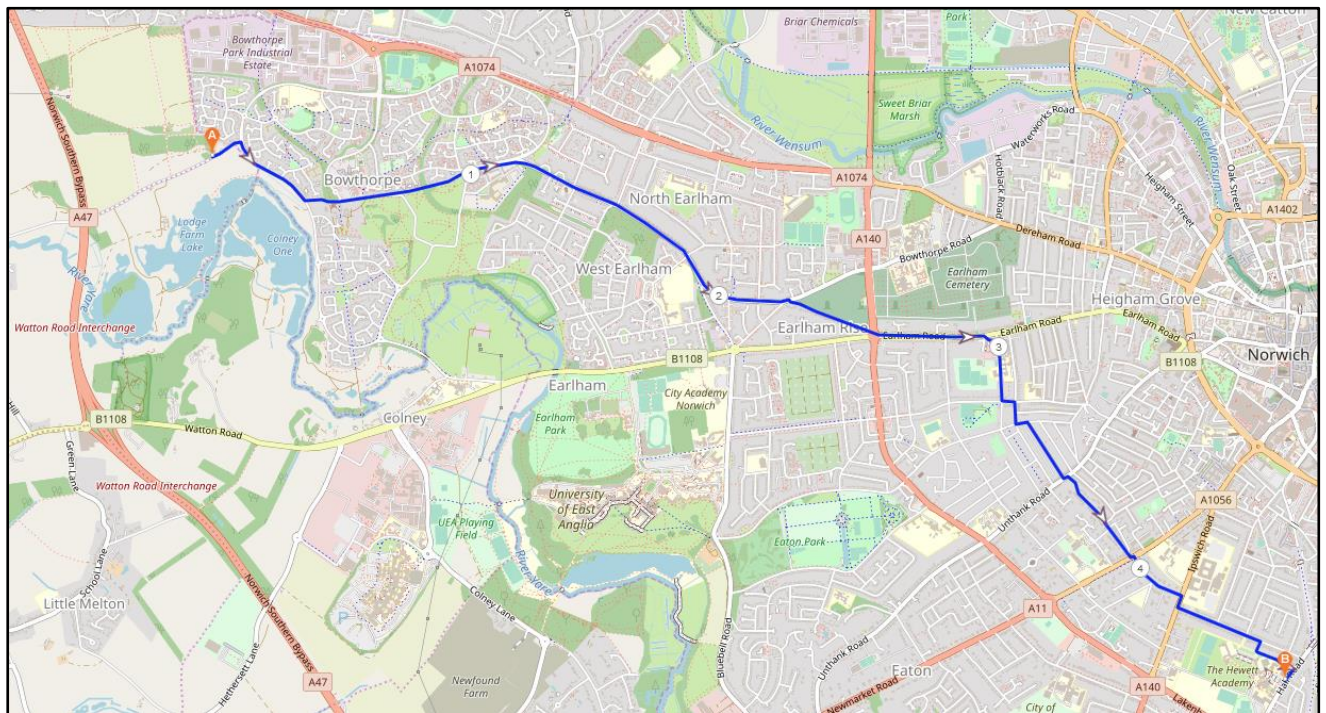
4.4.2. It is important to emphasise that the NCC secondary school forecast data covers the full period from the academic year 2021/22 until the academic year 2031/32.

4.4.3. It is also important to emphasise that the NCC secondary school forecast data includes the impact of any residential sites which were consented as planning applications at the time that these forecasts were prepared.

4.4.4. On the basis of these NCC forecasts the pressure for places at **Ormiston Victory Academy** (the closest school to the client site) at the time when dwellings on the proposed development would be built and occupied was due to increase from a **surplus of 61 places** in 2024/25 to a **deficit of 206 places** in 2026/27 and then be a **deficit of 160 places** by 2030/31.

4.4.5. Moreover, whilst there would appear to be a degree of surplus places at these collective 5 secondary schools by 3030/31, **this position is solely due to the significant number of surplus places that are forecast for the foreseeable future at The Hewett Academy.**

4.4.6. The Hewett Academy is 4.75 miles' walking distance from the easternmost corner of the proposed development site and hence significantly further than the maximum recommended walking distance of three miles for those over 8 years of age, as set out earlier in this Assessment:



Graphic: The Hewett Academy is 4.75 miles' walking distance from the proposed development site.

4.4.7. On the basis of these NCC forecasts the pressure for places at 4 of the 5 secondary schools in the Norwich South Secondary planning area (i.e. excluding The Hewett Academy) at the time when dwellings on the proposed development would be built and occupied was due to be a **deficit of 525 places** in 2026/27 and be a **deficit of 328 places** by 2030/31.

4.4.8. Further commentary regarding the demand for local secondary school places and the wider implications for secondary school place planning in the area is set out later in this Assessment.

4.5. Local Sixth Form Education – Status & Forecasting

4.5.1. The NCC Parents guide to admissions 2021 to 2022 states as follows:

“16-19 year olds

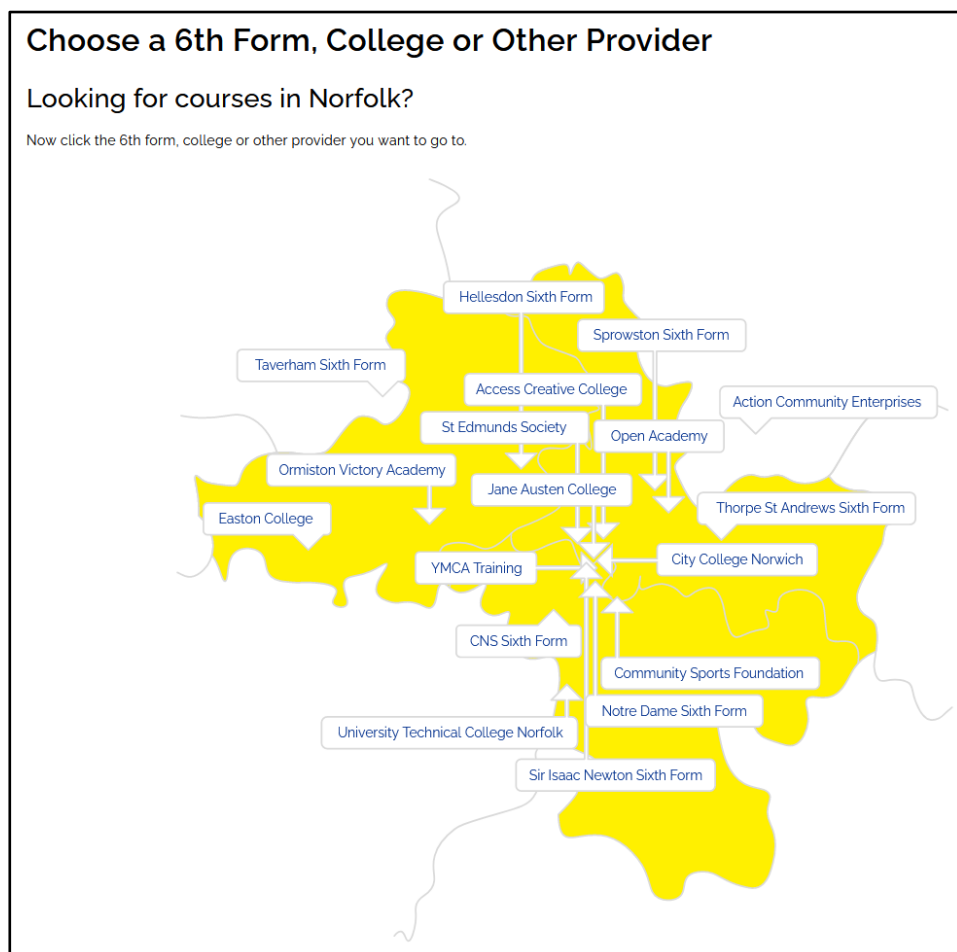
A pupil ceases to be of statutory school age on the last Friday of June of the school year (1 September – 31 August) in which he or she reaches his or her sixteenth birthday. However The Education and Skills Act 2008 means that all young people will be required by law to continue in education or training to the end of the academic year in which they turn 17 and until at least their 18th birthday.

There are sixth form colleges at Gorleston and North Walsham. Other colleges of further education offer a wide range of academic and vocational courses and some secondary schools offer sixth form provision.

Information on the choices available for 16-19 year old pupils and how to apply for places at sixth form centres, sixth form colleges and colleges of further or higher education can be found on the Help You Choose website at www.helpyouchoose.org”

[Source: NCC - Parents guide to admissions 2021 to 2022, at Appendix EHP06]

4.5.2. According to the website cited by NCC above, the following map shows the location of post-16 education providers in the wider Norwich area:



4.5.3. According to the latest available NCC school data, which EHP obtained via the submission of an FOI request [at Appendix EHP05], it is evident that NCC does not provide any additional sixth form forecasts over-and-above the annual data provided to the DfE covering year groups 12 and 13 (i.e. sixth form) in what is known as the SCAP, as referred to earlier in this Assessment in section 2.5.

4.5.4. The forecasts provided by NCC to the DfE for the NCC area, like for all other LEAs, are effectively 'static' sixth form forecasts as they assume that all available sixth form places will be taken up and hence do not show any potential increase in demand for sixth form places either as a result of underlying population growth or the impact of new housing.

4.5.5. However, it is possible to use other sources to discover the predicted underlying growth in the number of 17 and 18 year-olds in the local area and then use this as a basis to gauge the likely extent to which demand for sixth form places is likely to rise in the foreseeable future.

4.5.6. Naturally, such forecasts are not able to define whether children aged 17 and 18 are likely to seek a place at a local sixth form college or at one of the other potential establishments which offer post-16 education.

4.5.7. Nevertheless, it is still a valid exercise when seeking to discover the predicted number of 17 and 18 year-olds in the relevant local area as an indication of potential demand for sixth form places.

4.5.8. On 24th March 2020 the ONS published its **2018 Sub-National Population Projections**. The ONS data does not include any predicted change in population arising from housing growth coming forward.

4.5.9. The ONS 2018 Sub-National Population Projections for 17 and 18 year-olds living in all 7 districts in the Norfolk area are as follows:

	ONS Mid-Year 2018 Sub-National Population Projections (all 7 districts in the Norfolk area)									
AGE_GROUP	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
17 & 18	18,278	18,842	19,384	20,211	21,144	21,465	21,598	22,036	22,407	22,458
17 & 18	Baseline	564	1,106	1,933	2,866	3,187	3,320	3,758	4,129	4,180

	ONS Mid-Year 2018 Sub-National Population Projections (all 7 districts in the Norfolk area)									
AGE_GROUP	2021	2031	2032	2033	2034	2035	2036	2037	2038	2039
17 & 18	18,278	21,980	21,690	21,818	21,622	20,952	20,424	20,314	20,330	20,231
17 & 18	Baseline	3,702	3,412	3,540	3,344	2,674	2,146	2,036	2,052	1,953

[Source: ONS 2018 Sub-National Population Projections for 17 and 18 year-olds living in all 7 districts in the Norfolk area, at Appendix EHP08]

- 4.5.10. On the basis of these ONS population projections, **from a baseline date of mid-2021 the number of for 17 and 18 year-olds living in all 7 districts in the Norfolk area is predicted to increase every year until 2030.**
- 4.5.11. From a baseline date of mid-2021 until mid-2030 **the increase in the number of 17 and 18 year-olds living in all 7 districts in the Norfolk area is predicted by the ONS to be 4,180.**
- 4.5.12. From mid-2031 the ONS predicts that the number of **17 and 18 year-olds living in all 7 districts in the Norfolk area will decrease every year until 2040 but will still be 1,871 more than the baseline data in mid-2021.**
- 4.5.13. When reviewing the more local position regarding Norwich District, the ONS 2018 Sub-National Population Projections for 17 and 18 year-olds living in the Norwich District area only are as follows:

	ONS Mid-Year 2018 Sub-National Population Projections (Norwich District area only)									
AGE_GROUP	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
17 & 18	2,923	3,090	3,201	3,287	3,428	3,492	3,442	3,444	3,569	3,593
17 & 18	Baseline	167	278	364	505	569	519	521	646	670

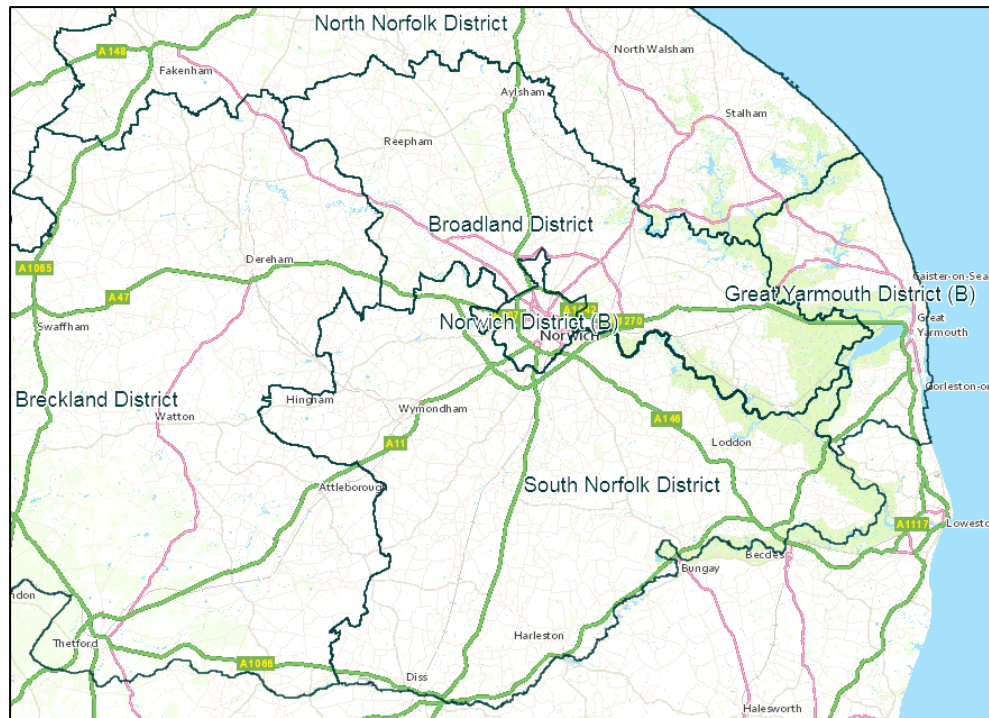
	ONS Mid-Year 2018 Sub-National Population Projections (Norwich District area only)									
AGE_GROUP	2021	2031	2032	2033	2034	2035	2036	2037	2038	2039
17 & 18	2,923	3,462	3,343	3,313	3,301	3,171	3,104	3,098	3,093	3,077
17 & 18	Baseline	539	420	390	378	247	181	175	170	153

[Source: ONS 2018 Sub-National Population Projections for 17 and 18 year-olds living in the Norwich District area only, at Appendix EHP08]

- 4.5.14. On the basis of these ONS population projections, **from a baseline date of mid-2021 the number of for 17 and 18 year-olds living in the Norwich District area only is predicted to increase every year until 2030.**
- 4.5.15. From a baseline date of mid-2021 until mid-2030 **the increase in the number of 17 and 18 year-olds living in the Norwich District area only is predicted by the ONS to be 670.**
- 4.5.16. From mid-2031 the ONS predicts that the number of **17 and 18 year-olds living in the Norwich District area only will decrease every year until 2040 but will still be 140 more than the baseline data in mid-2021.**

4.5.18. Naturally, the potential future demand for local sixth form places is not only likely to come from children living in Norwich District but also those living in adjacent Districts.

4.5.19. The following map shows that there are two Districts which are directly adjacent to the Norwich District area; those being South Norfolk District and Broadland District:



[Source: Map of Norfolk Area Local Planning Authorities (extract), at Appendix EHP09]

4.5.20. When reviewing the position regarding South Norfolk District, the ONS 2018 Sub-National Population Projections for 17 and 18 year-olds living in the South Norfolk District area only are as follows:

		ONS Mid-Year 2018 Sub-National Population Projections (South Norfolk District area only)									
AGE_GROUP		2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
17 & 18		3,046	3,137	3,271	3,442	3,593	3,777	3,888	3,942	3,950	3,990
17 & 18	Baseline		91	225	397	547	731	842	896	905	945

		ONS Mid-Year 2018 Sub-National Population Projections (South Norfolk District area only)									
AGE_GROUP		2021	2031	2032	2033	2034	2035	2036	2037	2038	2039
17 & 18		3,046	3,936	3,886	3,968	3,968	3,857	3,776	3,780	3,801	3,796
17 & 18	Baseline		890	840	922	922	811	730	734	756	750

[Source: ONS 2018 Sub-National Population Projections for 17 and 18 year-olds living in the South Norfolk District area only, at Appendix EHP08]

4.5.21. On the basis of these ONS population projections, **from a baseline date of mid-2021 the number of for 17 and 18 year-olds living in the South Norfolk District area only is predicted to increase every year until 2030.**

4.5.22. From a baseline date of mid-2021 until mid-2030 **the increase in the number of 17 and 18 year-olds living in the South Norfolk District area only is predicted by the ONS to be 945.**

4.5.23. From mid-2031 the ONS predicts that the number of **17 and 18 year-olds living in the South Norfolk District area only will decrease every year until 2036 but will still be 730 more than the baseline data in mid-2021.**

4.5.24. When reviewing the position regarding Broadland District, the ONS 2018 Sub-National Population Projections for 17 and 18 year-olds living in the Broadland District area only are as follows:

	ONS Mid-Year 2018 Sub-National Population Projections (Broadland District area only)									
AGE_GROUP	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
17 & 18	2,688	2,787	2,822	2,942	3,087	3,104	3,103	3,163	3,304	3,317
17 & 18	Baseline	99	134	254	398	416	415	475	616	629

	ONS Mid-Year 2018 Sub-National Population Projections (Broadland District area only)									
AGE_GROUP	2021	2031	2032	2033	2034	2035	2036	2037	2038	2039
17 & 18	2,688	3,191	3,127	3,161	3,137	3,023	2,957	2,978	2,996	2,995
17 & 18	Baseline	503	438	473	449	334	268	289	308	306

[Source: ONS 2018 Sub-National Population Projections for 17 and 18 year-olds living in the Broadland District area only, at Appendix EHP08]

4.5.25. On the basis of these ONS population projections, **from a baseline date of mid-2021 the number of for 17 and 18 year-olds living in the Broadland District area only is predicted to increase every year until 2030.**

4.5.26. From a baseline date of mid-2021 until mid-2030 **the increase in the number of 17 and 18 year-olds living in the Broadland District area only is predicted by the ONS to be 629.**

4.5.27. From mid-2031 the ONS predicts that the number of **17 and 18 year-olds living in the Broadland District area only will decrease every year until 2036 but will still be 268 more than the baseline data in mid-2021.**

- 4.5.28. In summary, on the basis of these ONS population projections, **from a baseline date of mid-2021 the number of for 17 and 18 year-olds living in the Norwich, South Norfolk and Broadland District areas is predicted to increase every year until 2030.**
- 4.5.29. From a baseline date of mid-2021 until mid-2030 **the increase in the number of 17 and 18 year-olds living in the Norwich, South Norfolk and Broadland District areas is predicted by the ONS to be 2,244** [calculation: $670 + 945 + 629 = 2,244$].
- 4.5.30. This figure would be the equivalent of a **26% increase in the number of 17 and 18 year-olds living in the Norwich, South Norfolk and Broadland District areas from the ONS mid-2021 baseline figure of 8,657** [calculation: $2,244 / (2,923 + 3,046 + 2,688) = 26\%$].
- 4.5.31. As stated earlier in this Assessment, this analysis does not define the number of children aged 17 and 18 are likely to seek a place at a local sixth form college or at one of the other potential establishments which offer post-16 education.
- 4.5.32. Nevertheless, this predicted significant increase in the number of 17 and 18 year-olds is still a useful and relevant indication that the demand for sixth form places in the relevant local area is likely to increase significantly in the foreseeable future.

5. Education Mitigation

5.1. Local Authority Commentary Regarding The Emerging Greater Norwich Local Plan & The Proposed Development

5.1.1. As part of the Sustainability Appraisal Framework set out within the context of the emerging Greater Norwich Local Plan, the following comments are made with regards to education:

Education (ref: SA10)	To improve skills and education.	<ul style="list-style-type: none"> Will it enable access to education and skills training? 	Indicator and target for access to education facilities to be identified
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[Source: Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Appendices Volume 3 of 3) (January 2021) (extracts), at Appendix EHP10]

5.1.2. The following comments with regards to the potential impacts of the proposed development on education places have been made within the context of the emerging Greater Norwich Local Plan:

D.8.10	SA Objective 10 – Education
D.8.10.1	Primary School: The closest primary schools to this cluster include Chapel Break Infant School, St Michael's Church of England Voluntary Aided Junior School and Queen's Hill Primary and Nursery School. Sites GNLP0581R and GNLP4045 are situated outside the target distance to these schools. The proposed development at these two sites could potentially result in a minor negative impact on site end users' access to primary education.
D.8.10.2	Secondary School: Ormiston Victory Academy is located in the south of Costessey. Site GNLP0581R is located within the target distance to this school, and therefore the proposed development at this site would be likely to result in a minor positive impact on site end users' access to secondary education. Site GNLP4045 is situated outside the target distance to this school, and therefore, the proposed development at this site would be expected to have a minor negative impact on site end users' access to secondary education.
D.8.10.3	The proposed development at Site GNLP4045 would be expected to have a major negative impact on site end users' access to both primary and secondary education.

[Source: Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Appendices Volume 3 of 3) (January 2021) (extracts), at Appendix EHP10]

5.1.3. The following comments with regards to status of available education places in the Costessey area were previously made within the context of the emerging Greater Norwich Local Plan:

“Costessey has considerable pressure for pupil places and would not be able to cope with further growth without new school provision”

[Source: Greater Norwich Local Plan - Site Assessment Booklet (Costessey extracts), at Appendix EHP11]

5.1.4. The following Policy with regards to the proposed development has been set out within the context of the emerging Greater Norwich Local Plan, citing a need for land for a new primary school and a new sixth form college:

Policy GNLP0581/2043

Land off Bawburgh Lane, north of New Road, east of the A47 (approx. 62.42ha) is identified as a contingency site for an urban extension including housing, open and play space, a local centre and education facilities. This could accommodate in the region of 800 homes.

The site will become an allocation if there are three consecutive years in which Annual Monitoring Reports show that housing completions in Greater Norwich are more than 15% below annual targets in each year and where under-delivery is the result of site specific constraints (for example there are infrastructure or ownership constraints or significant abnormal costs have been identified) preventing the delivery of committed and allocated housing sites.

More homes may be accommodated on the site, subject to an acceptable design and layout, as well as infrastructure constraints.

The development will address the following specific matters:

1. Approximately 4 hectares of the site should be safeguarded for education to provide a new primary school and a sixth form college in agreement with the education authority;
2. Provision of a new local centre on site (approx. 0.3ha) to include a convenience foodstore and three smaller units with parking provision.
3. Provision of adequate landscaping and green infrastructure.
4. Provision of a sustainable drainage system (SUDs);
5. Mitigation to address utilities infrastructure crossing the site;
6. Provision for off-site improvements to the highway network to address the impact of the development on the Longwater Junction and on New Road to ensure that the site can be adequately accessed from the A47 and A1074 and the A47 and B1108;
7. Norfolk Minerals and Waste Core Strategy Policy CS16 applies as this site is underlain by safeguarded mineral resources;
8. Preparation of a masterplan to guide the development, submitted as part of the application for planning permission.

[Source: Greater Norwich Local Plan - Policy GNLP0581_2043 (extract) with our emphasis, at Appendix EHP12]

5.2. EHP Commentary & Conclusions on Primary Education Impact & Mitigation

- 5.2.1. It is evident from the earlier analyses in our Assessment that the NCC primary school forecast data until 2030/31 demonstrates that there are **forecast to be significant surplus places available at the relevant local schools at the time when children on the proposed development may require a primary school place.**
- 5.2.2. On the basis of the NCC forecasts for the 6 primary schools in the Costessey and Bowthorpe Primary planning area it is evident that there were a significant number of local primary school places forecast to be available in the relevant future.
- 5.2.3. On the basis of these NCC forecasts the surplus of places at the time when dwellings on the proposed development would be built and occupied was due to remain constant with **480 places** in 2026/27 and with **466 places** in 2030/31.
- 5.2.4. In due course, in the event that the client site comes forward as a planning application we would recommend further discussion with the NCC education team at that time to establish:
- i. whether NCC's latest position takes into account its own forecast data which, at present, shows a very significant surplus of places at the 6 primary schools in the Costessey and Bowthorpe Primary planning area at the time when dwellings on the proposed development would be built and occupied;
 - ii. whether a new primary school would indeed be required on the proposed development;
 - iii. when such a school would need to become operational.

5.3. EHP Commentary & Conclusions on Secondary Education Impact & Mitigation

5.3.1. The NCC Schools Local Growth and Investment Plan April 2020 states:

“A plan for growth at Ormiston Victory Academy began in 2019 with the addition of new modular accommodation. A masterplan to develop the school site to its full potential has been drawn up and a plan for expansion is currently being discussed with the school and the Trust.”

[Source: NCC - Schools Local Growth and Investment Plan April 2020, at Appendix EHP13]

5.3.2. This position concurs with the matters set out earlier in this Assessment regarding the Costessey area and various elements of the emerging Greater Norwich Local Plan.

5.3.3. In recent discussions with the NCC education team it has become apparent that an additional factor which underpins the need for additional local secondary school places is the likely future change from the current pattern of pupil migration between relevant local secondary school areas.

5.3.4. According to NCC there has been a pattern of pupil migration from the Ormiston Victory Academy area to Taverham High School (which is outside the Norwich South Secondary planning area).

5.3.5. NCC states that the demand for places at Taverham High School will increase significantly in the near future due to the impact of local residential development within the Taverham High School area.

5.3.6. As a direct result the pattern of pupil migration will change with fewer children from the Ormiston Victory Academy area being able to gain a place at Taverham High School.

5.3.7. This will in turn increase the pressure for places at Ormiston Victory Academy and the need for additional local secondary school places in the Ormiston Victory Academy area.

5.3.8. Details of the approved planning application regarding the initial expansion of Ormiston Victory Academy are available [here](#). The Planning Statement sets out the following details:

“Norfolk County Council (NCC) Children’s Services (the client) has identified the need to expand teaching provision at Ormiston Victory Academy to accommodate the increase in residential growth in Costessey and subsequent demand for more school places. The school, which received planning permission in 2012, was intended to provide accommodation for 1250 pupils. However, recent analysis of capacity suggested that this number was closer to 1050. This proposal would allow for an increase in capacity at the school by an initial 300 pupils in the 11-16 age range, increasing overall capacity at the school nearer to the required levels.”

5.3.9. According to the NCC education team **further expansion of secondary education provision at Ormiston Victory Academy will not be feasible unless the existing sixth form provision at Ormiston Victory Academy is relocated to another local site**, hence the basis for NCC to seek for land for a new sixth form college on the client site.

5.3.10. As part of our recent discussions with NCC the education team summarised the basis of its proposal for a new sixth form college on the client site as follows:

“NCC has assessed that with any further housing in this area in addition to that already planned, there will be insufficient 11-16 places at Ormiston Victory Academy. There is not sufficient forecast demand to warrant a new high school so in order to make space at Ormiston Victory Academy for additional 11-16 places it seems a reasonable suggestion to move the 6th form to a new site. Initial discussions have been had with Ormiston Academy Trust and the school and they are willing to work with NCC on a proposal.”

5.3.11. It is important to emphasise that **this proposal by NCC is to relocate sixth form education provision at Ormiston Victory Academy to help ensure that there will be sufficient local secondary school places to meet the needs of existing residential development sites.**

5.3.12. These needs are clearly demonstrated by the current NCC school forecasts which include the impact of consented residential development sites. It is evident from the earlier analyses of the NCC forecasts that the pressure for places at 4 of the 5 secondary schools in the Norwich South Secondary planning area (i.e. excluding The Hewett Academy) at the time when dwellings on the proposed development would be built and occupied was due to be a **deficit of 525 places** in 2026/27 and be a **deficit of 328 places** by 2030/31.

5.3.13. On this basis **NCC’s proposal to use land on the client site for a new sixth form college would enable NCC to create additional secondary school places at Ormiston Victory Academy and hence help meet NCC’s statutory duty to provide sufficient secondary school places.**

5.4. EHP Commentary & Conclusions on Sixth Form Education Impact & Mitigation

5.4.1. As set out earlier in this Assessment, on the basis of ONS population projections, **from a baseline date of mid-2021 the number of for 17 and 18 year-olds living in the Norwich, South Norfolk and Broadland District areas is predicted to increase every year until 2030.**

5.4.2. From a baseline date of mid-2021 until mid-2030 **the increase in the number of 17 and 18 year-olds living in the Norwich, South Norfolk and Broadland District areas is predicted by the ONS to be 2,244.**

5.4.3. This figure would be the equivalent of a **26% increase in the number of 17 and 18 year-olds living in the Norwich, South Norfolk and Broadland District areas from the ONS mid-2021 baseline figure of 8,657.**

5.4.4. On this basis in our opinion **there is compelling evidence of a likely significant growth in demand for local sixth form places during the earlier stages of the Greater Norwich Local Plan period.**

5.4.5. In our opinion, whilst NCC does not have a statutory duty to provide sufficient sixth form places, NCC is likely to have taken into account this very significant forecast increase in the numbers of 17 and 18 year-olds living in the Norwich, South Norfolk and Broadland District areas when assessing the need to maintain sixth form education provision in the area as part of its proposals to relocate provision from Ormiston Victory Academy to a new sixth form college on the client site.

6. Appendices

The following appendices accompany this document:

- APPENDIX EHP01 - DfE - Securing Developer Contributions for Education (November 2019);
- APPENDIX EHP02 - DfE - Home to School Travel and Transport Guidance (July 2014);
- APPENDIX EHP03 - DfE - School Capacity Survey Forecast Guidance (April 2021);
- APPENDIX EHP04 - Site location;
- APPENDIX EHP05 - NCC - Pupil Forecasting – Summary (Housing with planning permission only) (2021);
- APPENDIX EHP06 - NCC - Parents guide to admissions 2021 to 2022;
- APPENDIX EHP07 - Norwich Area Sixth Form Service Providers;
- APPENDIX EHP08 - ONS - 2018 Sub-National Population Projections (All Districts in Norfolk);
- APPENDIX EHP09 - Map of Norfolk Area Local Planning Authorities (extract);
- APPENDIX EHP10 - Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Appendices Volume 3 of 3) (January 2021) (extracts);
- APPENDIX EHP11 - GNLP - Site Assessment Booklet (Costessey extracts);
- APPENDIX EHP12 - GNLP - Policy GNLP0581_2043 (extract);
- APPENDIX EHP13 - NCC - Schools Local Growth and Investment Plan April 2020;
- APPENDIX EHP14 - NCC - primary school locations;
- APPENDIX EHP15 - NCC - secondary school locations.