

Greater Norwich Local Plan Team
City Hall
St Peters Street
Norwich
NR2 1NH

GNLP MAIN MODIFICATIONS RESPONSES

STANTEC ON BEHALF OF WAIN ESTATES

CONSULTEE ID: 24244

Our Ref: 32696/A3

05 December 2023

Dear Sir/Madam,

Thank you for inviting comments on the Greater Norwich Development Partnership (2021) Greater Norwich Local Plan (GNLP) Main Modifications (Section 20(7C) of the Planning and Compulsory Purchase Act 2004) Consultation. These representations are made on behalf of Wain Estates, an experienced site promotion company, who have secured land on the edge of Costessey, referred to as 'Land off Bawburgh Lane, Costessey' (the 'Site'). The site was secured from Terra Strategic, who have previously promoted the site through the GNLP Examination, when it was a draft contingency allocation. Wain Estates control the majority of the site, with the remainder controlled by Norwich City Council (Property and Economic Development Team), who are supportive of the development proposal and have agreed for Wain Estates to take the lead with promotion of the Site through the Local Plan process.

These representations follow on from the previous representations made by Terra Strategic.

We respond to the Main Modifications Stage 20(7C) Submission Draft Local Plan which identifies a joint planning strategy for growth across the Greater Norwich area (comprising Norwich City, Broadland and South Norfolk District) for the period 2018-2038. Specifically in relation to the Site. Our main objection relates to the proposed deletion of our Client's contingency site, which was suggested in the Inspectors' letter dated 9th August 2023.

MM number	Policy / Para No	Comment on Proposed Change
9 1, 2 & 20	Policy 3 'Natural Environment' - Page 83 Policy 1 MM1 – paragraph 177 and MM2 Table 6	Support principle of MM9, Object to wider changes underpinned by MM20 reflected in updates to MM1 and MM2 In light of the letter issued from Natural England to 74 different Local Planning Authorities (including Greater Norwich) on 16th March 2023, we support the following addition to Policy 3 (MM9):

MM number	Policy / Para No	Comment on Proposed Change
	Appendix 6 'Housing Delivery Trajectory' – MM20	<p><i>'Within the catchments of the River Wensum Special Area of Conservation (SAC), The Broads SAC and the Broadland Ramsar: Residential development that results in an increase in the level of overnight stays; ... must provide evidence to enable the Local Planning Authority to conclude through a Habitats Regulations Assessment that the proposal will not adversely affect the integrity of sites in an unfavourable condition.'</i></p> <p>This will ensure development is only allowed in cases where Nutrient Neutrality can be achieved through effective on and/or off-site mitigation measures and reinforces the same requirements through the Habitats Regulations and the appropriate assessment process. Whilst we support this MM9, the implications of this with regard to housing delivery are likely to be significant. We do not consider that the MM proposed in respect of housing delivery support the Local Plan as an effective one which will achieve housing numbers required (MM20, MM1 and MM2).</p> <p>In previous evidence produced by the Partnership, the view was taken that <i>'given progress towards identifying mitigation solutions to address NN...the partnership considers that there would be justification to confirm a housing land supply of circa 6.05 years between 1st April 2023 and 31st March 2028'</i>. Within MM20 (Appendix 4 – Housing Delivery Trajectory and 5-year Land Supply), this five-year housing land supply has been reduced further. The updated calculation is for a 5.77 year supply, a 'surplus' of 1,687 homes.</p> <p>This new 5.77 year figure accounts for a 10% buffer, which is updated and reduced from the previous 22% buffer applied. The reason for this change to the buffer is unclear however, based on NPPF paragraph 74, the 10% buffer 'accounts for any fluctuations in the market during that year'. An Independent Report published by the Local Plans Expert Group (report to the Secretary of State) established recommendations to help ensure efficient and effective production of Local Plans. Within this report it is recommended that Local plans should 'make provision for and provide a mechanism for release of developable reserve sites equivalent to 20% of their housing requirement' i.e. a 20% buffer. In the context of GNLP spatial constraints specifically, the Nutrient Neutrality catchment area within which many of the sites forming part of the Local Plan sit, it is a realistic concern that a number of the homes contributing to the 5-year supply will be rendered undeliverable. As such the previous 22% buffer should be reinstated with contingency sites identified.</p> <p>Whilst the GNLP advise that progress has been made towards Nutrient Neutrality mitigation solutions, the evidence supporting this remains limited with publicly available details scant and high level of</p>

MM number	Policy / Para No	Comment on Proposed Change
		<p>uncertainty relating to availability, timing and costs of mitigation. The limited evidence provided suggests that the first credit solution is due to release 5,000 homes¹ however, beyond this there is no clarification available regarding any other schemes progressed at this stage. Therefore, even with the launch of this first scheme (which has not yet formally launched and begun trading) the 5,000 homes unlocked would not be sufficient to release enough homes to meet the 5-year trajectory. The implications of Nutrient Neutrality are reflected in MM to some strategic site allocations. For example, MM13 which shows the East Norwich Strategic Regeneration Area which was previously expected to deliver 3,230 homes by March 2038, is now reduced to 2,230.</p> <p>There is a very real danger of much needed housing not being delivered at the projected rate. The previous April 2022 Housing Delivery Trajectory established '<i>existing permissions and allocations</i>' of 1,987 in 2020/21 and 2,609 in 2021/22. However, the updated Housing Delivery Trajectory shows that 'delivery' of homes at 2020/21 was 1,602 – 385 (19%) less than 'commitments' and at 2021/22 was 1,886 – 723 (28%) less than 'commitments'. The delivery shortfall is likely due to the aforementioned unresolved Nutrient Neutrality matters. Given that the 'total forecast supply' for the remainder of the plan period (to 2038) is based upon information gathered from developers and industry averages for lead-in times and sales rates for new homes, the predictions are not an absolute and are highly changeable. Compared with the previous trajectory (April 2022), the updated trajectory sees a significant uplift in figures associated with the 'existing permissions and allocations' supply, particularly up to the year 2031/32. It is a justified concern that this uplift may not materialise. In this case, the contingency site at Costessey (Policy GNLP0581/2043), which is demonstrated to be both available and achievable for delivery of 800 homes with the ability to meet a Nutrient Neutrality solution on site (refer Appendix 1 – MEC Report as submitted alongside our previous 'Matter 4' response), is a justified and effective addition to the Local Plan to ensure robustness.</p> <p>The updated Trajectory (Appendix 4, MM20) feeds directly into the MM2 at Table 6 which '<i>establishes the Plan's total housing potential figures</i>'. This modification maintains a Housing requirement (2018 to 2038) of 40,541, however it includes an amended 'Total Forecast Supply' (previously 'potential') of 45,041. This forecast is reduced from the previous forecast of 49,492 which is in part due to the reduced 'buffer' applied (11%). Comparing the requirement against the forecast supply, this leaves a buffer across the plan period of 4,500 homes (225 homes per year split across the 20-year plan period). It is our view that this buffer is not sufficient to account for impact upon supply caused by Nutrient Neutrality coupled with potential (currently unknown and unpredictable) market and</p>

¹ Norfolk Environmental Credits 'First Credits in the Yare Catchment': [How to buy Norfolk Environmental Credits](#)

MM number	Policy / Para No	Comment on Proposed Change
		political/policy changes. The importance of including the GNLP0581/2043 as an allocation, able to provide 800 homes, is clear to ensuring robustness and flexibility of the Local Plan to respond to supply and delivery challenges. If not allocated, at the very least, the site should be identified as a contingency site.
13, 76 & 149	<p>Policy 7.1 (MM13)</p> <p>Paragraphs 3.20 and 3.21 (MM76)</p> <p>Section 8 – Policy GNLP0581/2043 (Page 474)</p>	<p><u>Object to deletion of Costessey Contingency Site</u></p> <p>The Council has amended the GNLP to delete section 8 which relates to the Costessey Contingency Site. Given this deletion of Policy GNLP0581/2043 supporting text at Policy 7.1 (MM13) which reads '<i>a large contingency site is identified in Costessey to be brought forward if delivery of housing in the GNLP area does not meet local plan targets</i>' and paragraphs 3.20 and 3.21 (MM76) have also been deleted.</p> <p>We assume that the Inspectors are in agreement that the principle of the contingency site is consistent with national policy² but that the issue, as raised in the Inspectors' letter, is that the trigger mechanism is not deemed to be effective and nor could it be reasonably be made effective by modification. We respectfully disagree with this position as the suggested wording we put forward in our Matter 3 statement (repeated below) would be responsive and therefore successful in producing the desired or intended result of resolving an issue with the housing supply in the Plan:</p> <p><i>'The site will become an allocation for development if any of the following apply at any point in the Plan period:</i> <i>a) the Council's Housing Delivery Test shows that delivery has fallen below 95% in the previous year; or</i> <i>b) if annual monitoring data indicates that forecast housing land supply falls lower than 5.5 years; or</i> <i>c) net affordable housing delivery (as a percentage of overall housing delivery) falls below 28% over a period of two consecutive years'</i></p> <p>Reference is also made in the Inspectors' letter to there not being a need for the contingency as the housing supply will be 'sufficient' to meet housing needs in the Plan period.</p>

² We highlight examples elsewhere in adopted Local Plans including North Warwickshire (adopted September 2021) and West Lancashire (Policy RS6, adopted October 2013)

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		<p>We respectfully again disagree and therefore object to this deletion on the basis that removing this site, which could deliver up to 800 homes and supporting infrastructure on a site which, by the Council's own assessment, is relatively unconstrained and in a sustainable location consistent with the spatial strategy and objectives of the Plan. Deleting this contingency allocation would undermine the previously identified benefits the site presented in terms of securing flexibility and security of housing supply; which for reasons we set out above and in our earlier representations, is at risk for a number of factors including Nutrient Neutrality.</p> <p>The purpose of GNLP20943/0581 as a contingency site was that when a specific trigger was met the site would become an allocation. The trigger was originally proposed as follows (we have suggested changes as above):</p> <p><i>'...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.'</i></p> <p>In the Inspectors response, a primary reason for the MM, omitting the contingency site, was that the <i>'trigger mechanism is ineffective and could not be made reasonable by modification'</i>³.</p> <p>When taken against the updated Housing Delivery Trajectory Document (MM20, now Appendix 4) which establishes a residual annual housing requirement of 1990 homes, a 15% under delivery can be calculated as just 299 homes per annum. That is, any year with a delivery of 1,691 homes or less would surpass this 'trigger'. In light of potential risks to supply, including the implications of Nutrient Neutrality upon housing delivery at major sites within the GNLP catchment, the requirement for this contingency site is not unreasonable or unjustified.</p> <p>As detailed at our response to MM9 above, Nutrient Neutrality has stalled progress and held up delivery of thousands of homes within the Local Plan area. The Council have acknowledged, in previous</p>

³ Inspectors Letter to GNLP: [Letter to GNLP July 2023 1.pdf](#)

MM number	Policy / Para No	Comment on Proposed Change
		<p>Housing Trajectories, namely that of April 2022⁴ that of the 37,651 forecast housing supply to 2038, 23,948 of these would be impacted/delayed by Nutrient Neutrality.</p> <p>The updated Housing Trajectory⁵ published as part of this Main Modifications stage, 'Appendix 4' establishes a 'Total Forecast Supply' of 45,041' which exceeds the requirement for 40,541 to 2037/38. This requirement figure accounts for average delivery 2018/19 to 2021/22 for which annual housing completions kept pace with meeting the need for 40,541 homes by 2038. Notwithstanding this, average completion progress is based four years prior to the issue of Natural England's Nutrient Neutrality advice. Following this advice made on 16th March, the GNLP acknowledged <i>minimum</i> delays of 18 months for residential schemes (as set out in our Matters 15 response, ID 24244).</p> <p>At this current time progress towards certainty around Nutrient Neutrality remains limited and thus impacted development is still stalled. On 13th September 2023, 16 months following the announcement, the House of Lords voted on government proposals which were intended to unlock 100,000 homes between 2023 and 2030 in areas affected by Nutrient Neutrality. However, the necessary amendments to the LURB (now LURA) were not supported in the House of Lords and therefore were not added to the Bill. As such, Nutrient Neutrality, and the resulting delays to housing delivery remain with the Government still to make further announcements. Most recently Government has been reported to confirm that no legislative changes are on the horizon, with no mention of the issue through the King's Speech or the Autumn Statement, other than additional funding for mitigation through the Nutrient Mitigation Fund. Whilst the GNLP anticipated an 18-month delay, we suggest that delays are likely to be significantly greater than this as many parts of the country affected by this are still left without mitigation solutions (or at least sufficient mitigation to release all housing required to meet local plan requirements) for 4-5 years, if not more. This could skew the housing trajectory and implicate delivery of a sufficient supply of homes, particularly in the first 5 years of the plan.</p> <p>Given the uncertainty presented with regard to housing trajectory, it is critical that additional sites for housing are identified. We strongly object to the omission of the Costessey contingency site on the basis that the flexibility it affords is imperative to the effectiveness of the Local Plan.</p>

⁴ [Appendix 6 Housing delivery trajectory | GNLP](#)

⁵ [Annexe 2 Housing Trajectory Master.pdf \(oc2.uk\)](#)

MM number	Policy / Para No	Comment on Proposed Change
		<p>The Sustainability Appraisal of the Main Modifications (October 2023) states that 'new and amended policies would be expected to improve the sustainability performance of the GNLP or would have no significant change with regard to sustainability'. We disagree, not only in relation to the benefits a sustainable site in an accessible location could provide in terms of housing supply in the early years and throughout the Plan period, but also in relation to the unrealised benefits of the contingency site not coming forward, notably around education.</p> <p>The proposed to be deleted allocation included a requirement that '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'.</p> <p>As we have set out in our Matter 5 statement, which includes a Statement of Common Ground with the Local Education Authority, there is significant pressure for secondary school places in the locale, which necessitates the loss of the Ormiston Victory Academy sixth form to expand secondary provision to meet the demand from existing housing growth. Given that one of the objectives of the Local Plan is to increase <i>inter alia</i> secondary school provision to facilitate this housing growth, one of the infrastructure requirements for the site at Costessey was that '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'. This was agreed, as reflected within the Statement of Common Ground with the Education Authority (Appendix 2). Our Education Impact and Mitigation Assessment (EIMA), submitted at part of our Matter 5 response (Appendix 3), explores the Plan's education requirements. Relating to Sixth Form need the EIMA sets out that 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. There is a need to increase the supply of Sixth Form 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). Despite this, there is no identified alternative site for a replacement sixth form college other than our site. Without our site, there will be insufficient secondary or sixth form</p>

MM number	Policy / Para No	Comment on Proposed Change
		places to meet the identified growth in the Plan and will lead to unsustainable patterns of travel given the lack of sixth form options locally. This will undermine the Plan and its objective to deliver 'vibrant, healthy, inclusive and growing communities supported by the delivery of new homes, infrastructure', as set out in our response to Matter 1.
MAP3	Norwich Settlements Map	If the Inspectors are minded to allocate or reinstate GNLP0581/2043 as a Contingency Site, then the Policy Map needs to be revised and updated accordingly.

Appendix 1 - 26700-FLD-0101---tech note_ nutrient neutrality

Long Lane, Costessey
Technical Note: Nutrient Neutrality Mitigation Proposals
Our Ref: 26700-FLD-0101 Rev A
February 2023

Introduction

Mewies Engineering Consultants Ltd (M-EC) has been commissioned by Terra Strategic Ltd (hereafter referred to as 'the Client') to provide drainage advice to support a proposed mixed-use development on Land off Bawburgh Lane, Costessey (hereafter referred to as 'the Site').

A site location plan is shown in **Figure 1** below and an illustrative masterplan is included in **Appendix A**. The development proposals comprise:

- Approximately 800 dwellings
- A new Sixth Form College and 2-form entry Primary School
- A local centre including employment opportunities

Figure 1: Contextual Site Location Plan



This Technical Note will detail how proposed foul water and surface water drainage solutions for this Site will be implemented to overcome concerns raised by Natural England regarding nutrient pollution in the Norfolk area.

The site is currently allocated as part of draft Policy GNLP0581/2043 as a contingency site for a residential led development within the Greater Norwich Local Plan (GNLP) Sites Document.

The GNLP has been in abeyance since a letter was issued by Natural England in March 2022 concerning nutrient pollution in the protected habitats of the River Wensum Special Area of Conservation and the Broads Special Area of Conservation and Ramsar site. The letter advised that new development within the catchment of these habitats comprising overnight accommodation can cause adverse impacts on nutrient pollution.

New developments, such as this Site, generate additional wastewater flows which raise levels of nutrients (phosphorus and nitrogen) which can speed up the growth of algae in water. This process, called eutrophication, degrades the quality of the water and harms wildlife. As a result, solutions are required to overcome the impacts of foul drainage from development sites.

The large scale nature of this Site, offers the opportunity to implement an on site foul treatment solution along with surface water drainage measures to overcome the concerns of Natural England, enabling development to come forward quickly and within the plan period. On site solutions would overcome reliance on off site measures (via the sale of credits) which are not yet determined. These measures could include the creation of wetland habitats and/or improvements existing Sewage Treatment Works.

The proposed measures for this Site are set out in more detailed below.

Foul Drainage

In order to determine whether an on site foul treatment solution can be provided as part of these development proposals, M-EC have undertaken extensive discussions with Severn Trent Connect (STC). STC are a Statutory Undertaker for wastewater services operating under the Water Services Regulation Authority's (Ofwat) 'New Appointee and Variations' framework (NAV). This allows STC to operate across England and Wales rather than being confined to geographical area.

STC ideally work on developments in excess of 500 dwellings and therefore the proposed development is more than suitable in scale to cater for an on site treatment process. Dealing specifically with the nutrient neutrality, STC have developed a Sewage Treatment Works which utilises a chemical free process which reduces nitrates and phosphates to acceptable levels. The scale of the treatment required is based on the specific requirements of that geographical location and can be adapted accordingly.

The Sewage Treatment Works are odourless, but in accordance with STC recommendations, would be cited 50m from the nearest dwelling. It is therefore likely any facility would be located in the south western corner of the site adjacent to the A47 with dwellings set back accordingly. A proposed location is shown on the masterplan is shown in **Figure 2** below. An example of the proposed facility is shown in **Figure 3**.

Figure 2: Indicative location for Sewage Treatment Works

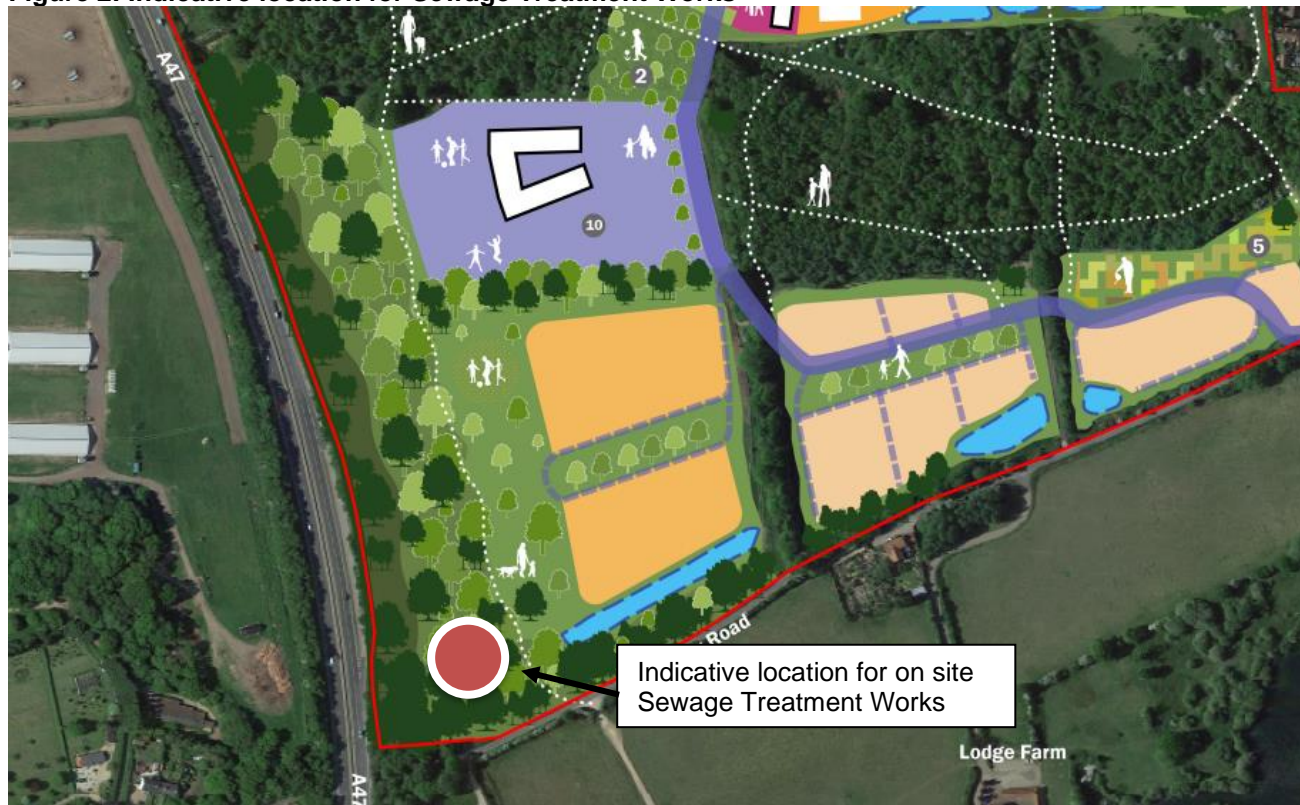


Figure 3: Example of proposed on site Sewage Treatment Works



Foul drainage from this facility would outfall to the River Yare which is located to the south of the Site. A permit from the Environment Agency will be required and water quality monitoring and testing across a 6–12 month period will be undertaken in due course.

Surface Water Drainage

Surface water drainage will be managed on Site in accordance with the SuDS hierarchy. Information published by the British Geological Survey indicates the Site is directly underlain by chalk with superficial deposits of Sands and Gravels. Given the available information, it is assumed that soakaways will be feasible across the Site subject to soakage testing being completed in due course.

Current assessments indicate approximately 25,000m³ of attenuation will be required across the Site to cater for all events up to the 1 in 100-year return period with a 40% climate change allowance and a 1 in 30 year event within 24 hours to account for half drain down times. Attenuation will be provided across a series of SuDS features which will include basins, swales, permeable paving and rain gardens.

CIRIA document *C753 'The SuDS Manual'* indicates minimum treatment indices appropriate for contributing pollution hazards for different land use classifications to ensure adequate levels of treatment are provided to remove pollution. In addition to this, CIRIA have recently published document *C808F 'Using SuDS to reduce phosphorus in surface water'*, which provides a good practice guide on the correct use of SuDS treatment trains, which will help to reduce the amount of phosphorus in surface water runoff without the requirement for complex and expensive proprietary products.

The surface water drainage proposals for this site will apply the requirements of the above CIRIA documents ensure suitable and appropriate treatment trains are in place to remove pollution and reduce the amount of phosphorus in surface water runoff.

Summary

The Site is located in an area which is currently subject to development restrictions imposed by Natural England due to concerns regarding nutrient pollution on protected habitats in the Norfolk area. As such, solutions are required to reduce pollution impacts and these development proposals, due to the large scale, can deliver the following on site solutions, thereby removing reliance on off site measures:



- Provision of an on site Sewage Treatment Works specifically developed to utilise a chemical free process in order to reduce nitrates and phosphates to acceptable levels. Th facility can be easily be incorporated into the development proposals and sufficiently offset from proposed dwellings. The facility would outfall to the River Yare, a Main River located immediately to the south of the site.
- A SuDS based surface water drainage solution will be delivered through the provision of numerous SuDS features including (but not limited to) basins, swales, permeable paving and rain gardens. Treatment trains in accordance with CIRIA documents C753 and C808F will be provided to ensure suitable and appropriate treatment trains are in place to remove pollution and reduce the amount of phosphorus in surface water runoff.

These measures can provide the required mitigation to overcome the concerns of Natural England and enable this Site to be allocated as part of the Greater Norwich Local Plan.

REGISTRATION OF AMENDMENTS

Date	Rev	Comment	Prepared By
Feb 2022	-	First issue	Alexander Bennett BSc(Hons) MCIHT MTPS Director
March 2022		Client comments	Alexander Bennett BSc(Hons) MCIHT MTPS Director

Appendices

A. Illustrative Masterplan

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Appendix 2 – Education Statement of Common Ground - Land off Bawburgh Lane and New Road Costessey v1-3



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

EHP Consultants

The home of social infrastructure analysis[®]

www.ehp-consultants.com



Conifers House
Blounts Court Road
Peppard Common
Henley-on-Thames
RG9 5HB

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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:

.....

Date: 14/01/22

Name: Oliver Nicholson

(Strategy Director, EHP Consultants Ltd)

For and on behalf of

BSL Strategic Limited

Date: 14/01/22

Name: Isabel Horner

(Sufficiency Delivery Manager, NCC)

For and on behalf of

Norfolk County Council

Appendix 3 - Education Impact & Mitigation Assessment



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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www.ehp-consultants.com



Conifers House
Blounts Court Road
Peppard Common
Henley-on-Thames
RG9 5HB

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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.”

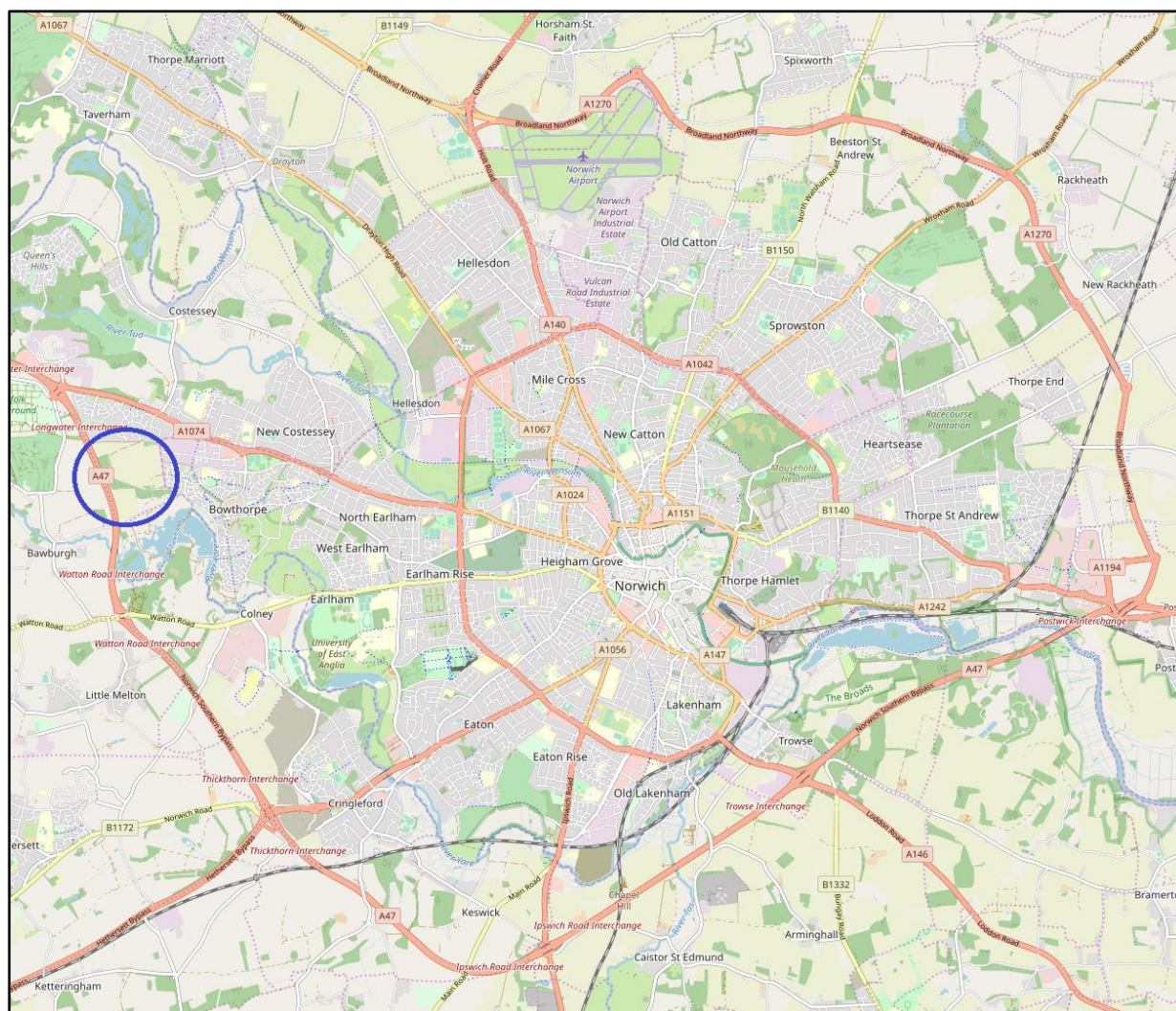
[Source: DfE - School Capacity Survey Forecast Guidance (April 2021), at Appendix EHP03]

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:



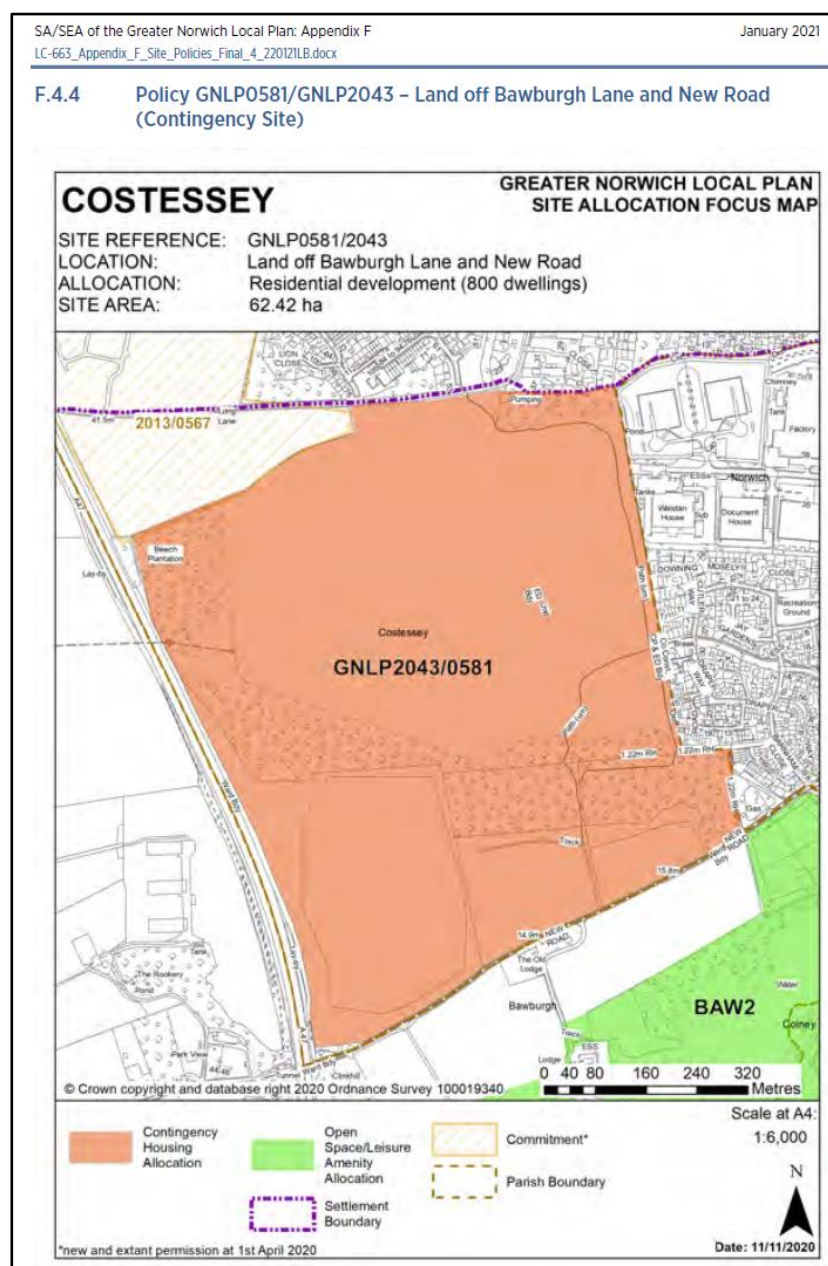
[Source: Site Location, at Appendix EHP04]

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

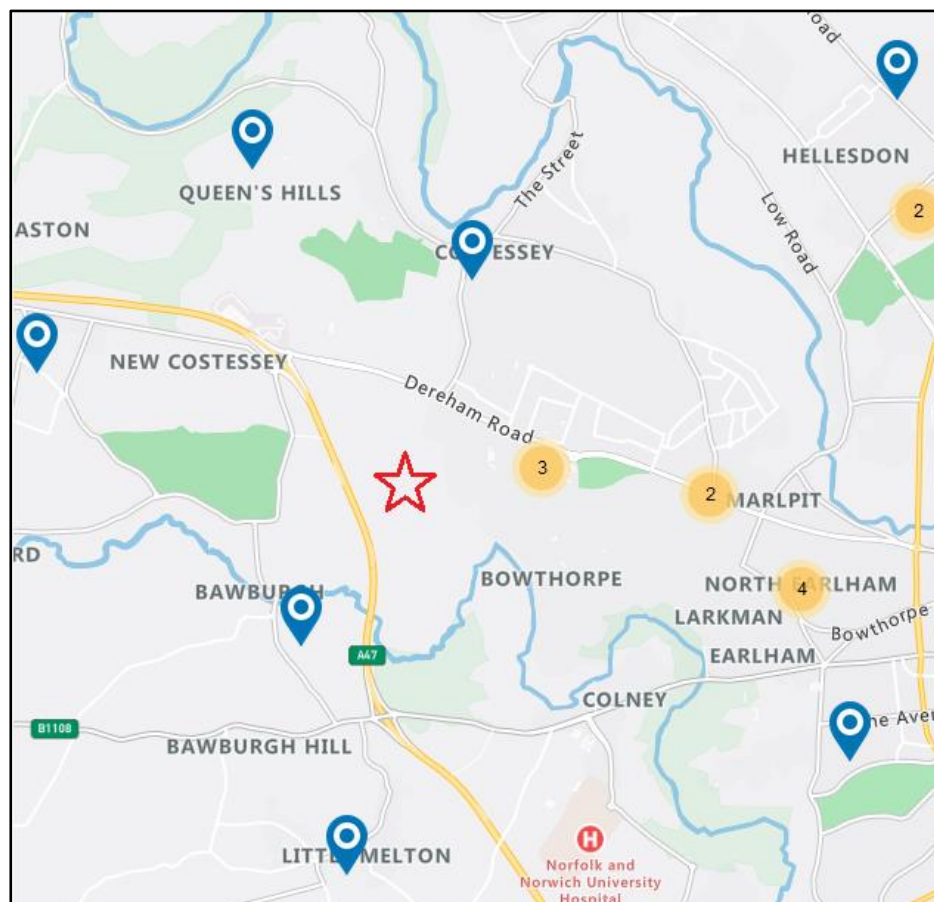
4.1. Local Primary School Locations

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.

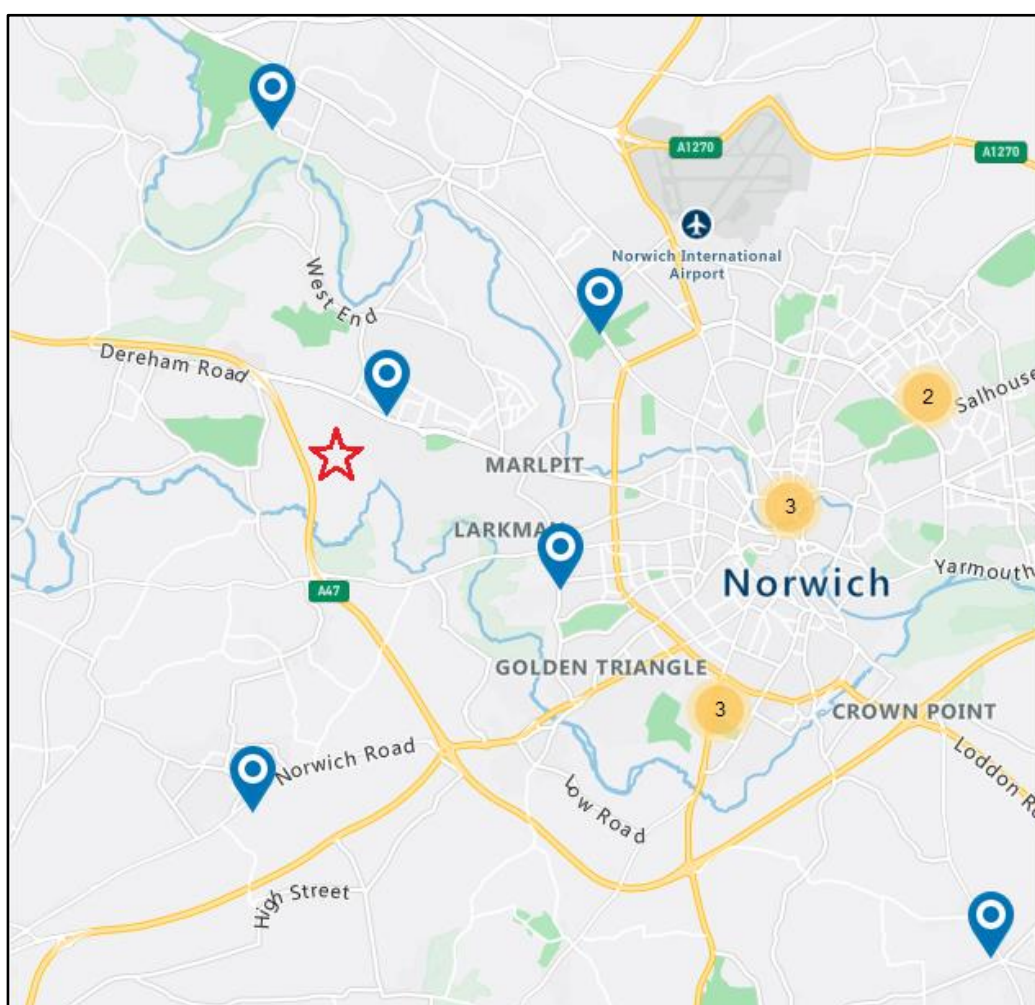
4.2.6. Further commentary regarding the demand for local primary school places and the wider implications for primary school place planning in the area is also set out later in this Assessment.

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]

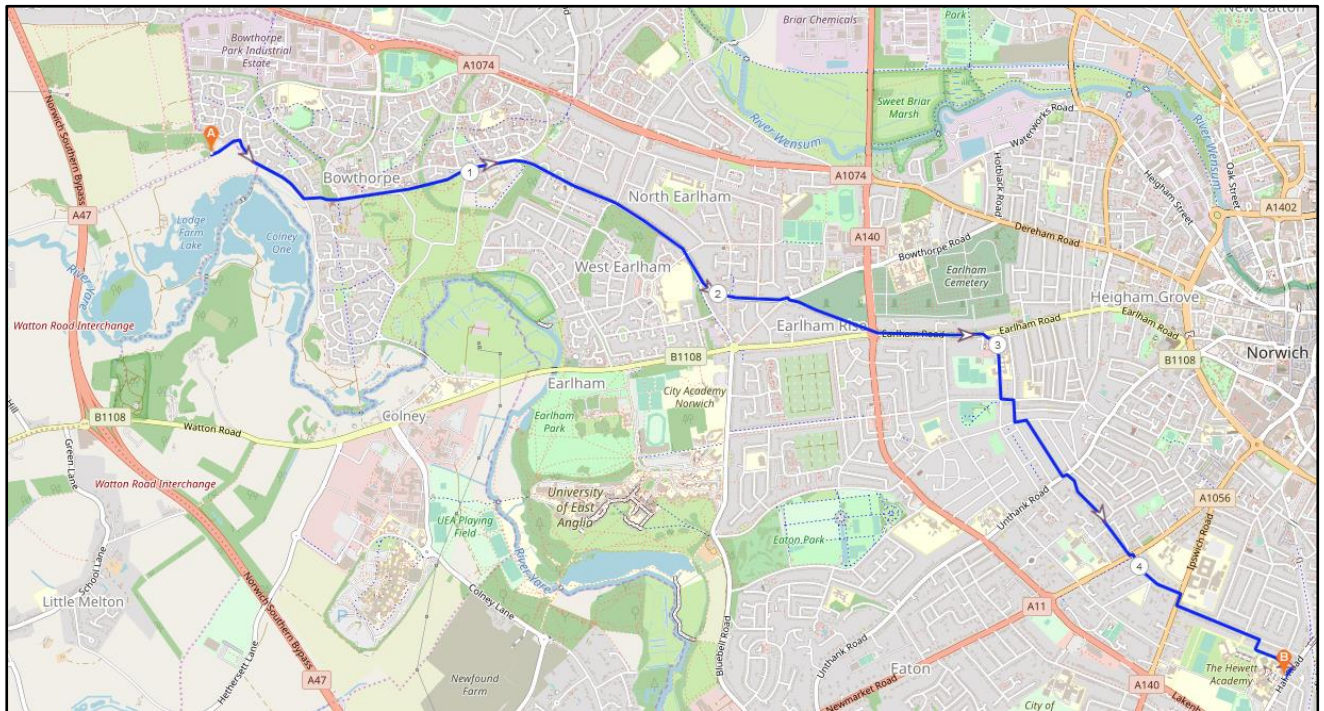
4.4.2. It is important to emphasise that the NCC secondary school forecast data covers the full period from the academic year 2021/22 until the academic year 2031/32.

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

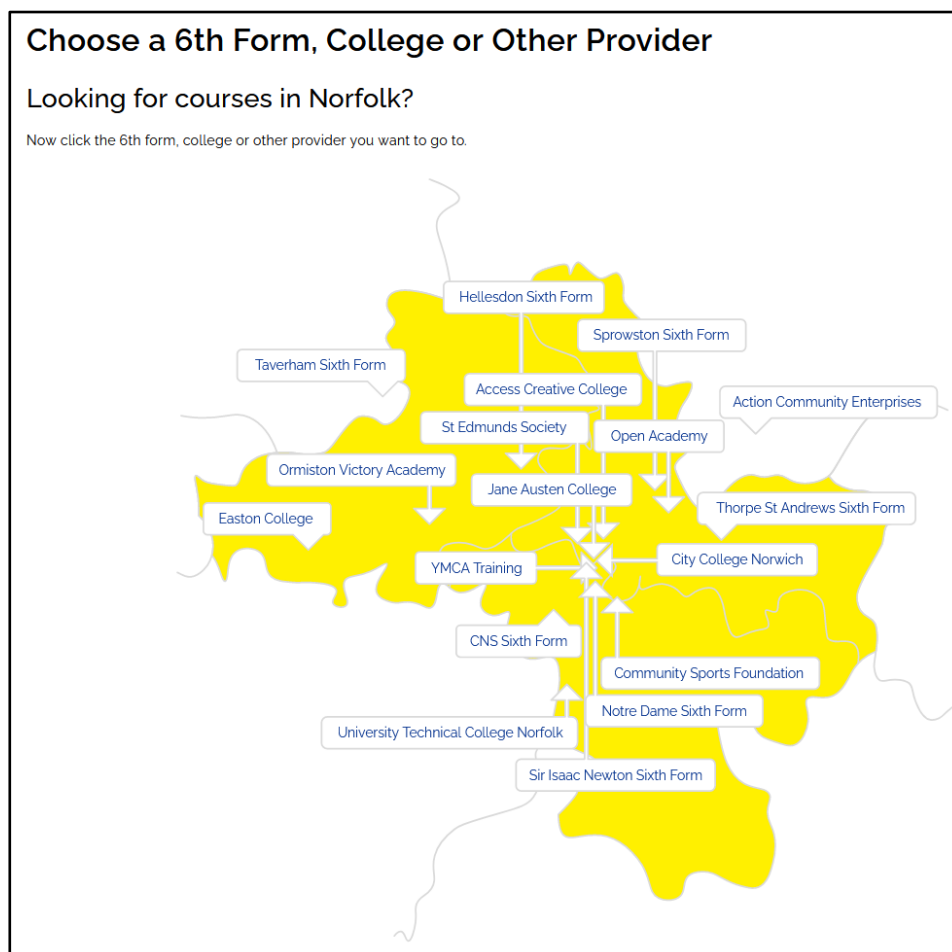
A pupil ceases to be of statutory school age on the last Friday of June of the school year (1 September – 31 August) in which he or she reaches his or her sixteenth birthday. However The Education and Skills Act 2008 means that all young people will be required by law to continue in education or training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

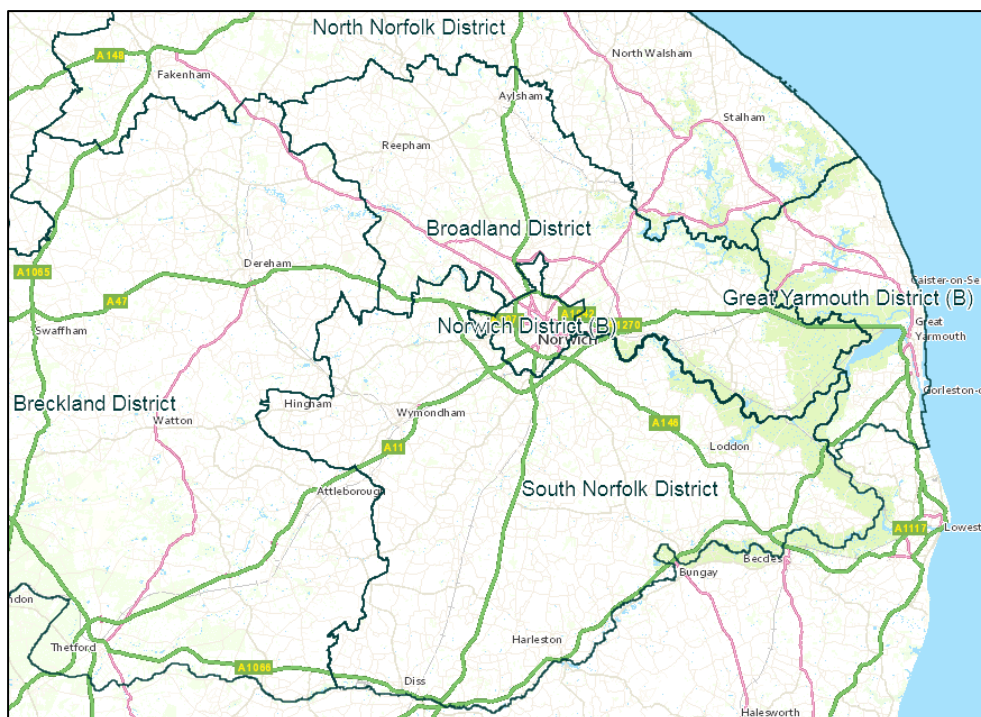
	ONS Mid-Year 2018 Sub-National Population Projections (Norwich District area only)									
AGE_GROUP	2021	2031	2032	2033	2034	2035	2036	2037	2038	2039
17 & 18	2,923	3,462	3,343	3,313	3,301	3,171	3,104	3,098	3,093	3,077
17 & 18	Baseline	539	420	390	378	247	181	175	170	153

[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.	• 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.