

Supplementary Report

The Implications of Development on High School
Facilities in the Wymondham Area of Norfolk

For
Landstock Estates Ltd,
the Landowners Group and
United Business and Leisure (Properties) Ltd

21 June 2013

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The Implications of Development on High School Facilities in the Wymondham Area of Norfolk

	Contents	Page
1	<i>Introduction</i>	1
2	<i>Overview</i>	1
3	<i>The Situation in Wymondham</i>	2
4	<i>Accommodating Future Growth</i>	3
5	<i>Accommodating the Level of High School Places Required from Growth Being Promoted Which Affects Wymondham and Hethersett High Schools</i>	5
6	<i>Conclusions</i>	8
	<i>Appendix 1</i>	9
	<i>Annex – EFM Practice Briefing Note on School Place Planning</i>	10

1 Introduction

1.1 This submission is supplementary to our report prepared on 20 March 2013 and included within examination document DV6. It responds to two additional documents submitted by the Councils to the Joint Core Strategy Examination, written by Norfolk County Council as local education authority (Document DV5) and Wymondham High Academy Trust (Document DV4).

2 The County Council's Note (DV5)

2.1 The County's Note dated 15 May 2013, written by Jane Blackwell sets out factual information about existing pupil numbers, and confirms that a 15 year masterplan has been drawn up to increase the capacity of Wymondham High School (aka Wymondham High Academy) to 2043 places (comprising 1,500 11-16 secondary places and 543 sixth form places¹). This is "based around 2,200 dwellings in the Town" and, NCC states, the maximum size the school can grow to. The Note states that Wymondham High Academy "feels very strongly" that it wants to keep its sixth form on site.

2.2 The Note explains that Phase 1 of the masterplan is currently in progress and is unlikely to add to capacity. Further phases do not yet have funding identified, and developer funding is anticipated.

2.3 The Note confirms that with only 1,200 additional dwellings at Silfield (South Wymondham) in addition to existing consents the 11-16 capacity of the enlarged school will be reached. There would be surplus sixth form capacity which is considered will be taken up by an increase in the number of pupils staying on at school and demand from Hethersett. The pupil expectation from the 1200 dwellings is 168 (11-16) secondary pupils and 34 sixth form pupils.

2.4 It is evident the County has calculated the expected pupils numbers by applying pupil multipliers of 14.0 and 2.8 pupils per 100 dwellings for secondary and sixth form respectively.

2.5 On the information presented it is evident that there is a "fit" between the housing growth figure and the proposed expansion of the school. It appears that the 2,200 dwelling figures was adopted and the masterplan for the school developed to accommodate the expected increase in pupil numbers. There is no evidence that alternative options were considered to accommodate any alternative housing growth options. Nor is there any explanation of why Wymondham High Academy feels so strongly about keeping the sixth form on site.

2.6 There is no consideration of what might happen beyond the plan period (2026), when the school will be unable to expand further.

¹ 1,500 11-16 places equates to ten forms of entry, 300 pupils per year group. A form of entry is 30 pupils per year group. Capacity for 543 sixth form pupils indicates an average "stay on rate" of about 90%, reflecting that the school caters for its own pupils staying on and will also admit pupils into its sixth form from schools without sixth forms.

2.7 The County's Note makes it clear that development of other than 2,200 dwellings would not be in line with the masterplanning for the school which has taken place. However, this does not mean that an alternative number of dwellings cannot be catered for.

2.8 In fact, the County's analysis is now out of line with its own adopted approach. The pupil multipliers set out at paragraph 2.4 above were the County's standard figures, but were superseded in April 2013² following an analysis of recent developments in Norfolk. The updated pupil multipliers are 17.3 and 1.7 pupils per 100 dwellings for secondary and sixth form respectively – see Appendix 1. This represents an increase of 24% in expected secondary pupil figures and a reduction of 39% in sixth form numbers from those stated in the County's Note.

2.9 The table in the Conclusion section of the County's Note is amended below to reflect the revised multipliers:

11-16	
Current roll	1199
Sites with pp	167
Silfield	208
TOTAL	1574

6th FORM	
Current roll	406
Sites with pp	16
Silfield	21
TOTAL	443

2.10 Plainly the County's figures, and conclusion that the secondary figures would be a good match with development of an additional 1,200 dwellings at Silfield, should be treated with caution.

2.11 Notwithstanding the detail of the County's calculation, the fundamental point remains that the County has a statutory duty to ensure a sufficiency of school places for the residents of its area. It is inappropriate to suggest it is the County's role to support, or oppose, a particular amount of housing development based on the education implications.

2.12 It is unlikely that the County will now suggest the scale of development at Silfield should be reduced so as to result in a convenient secondary education impact. However, it can be noted that to reduce the impact of the now estimated secondary pupil demand by the additional 74 places over 1,500 maximum 11-16 capacity, the number of dwellings at Silfield would need to be reduced to 773 ($(208-74) / 208 \times 1200$).

2.13 This reduction of 427 dwellings to 773 dwellings would then result in an impact of 134 secondary pupils from Silfield in the table above, and an overall total of 1,500 in line with the

² INFRASTRUCTURE, SERVICE AND AMENITY REQUIREMENTS FOR NEW DEVELOPMENT - Planning Obligations Standards - April 2013, Norfolk County Council.

masterplan for the school. However, even this reduction in dwellings would not lead to the expectation that sufficient secondary places would be available, for reasons that are explained in Section 4.

2.14 It can be noted that there is nothing in the County's submission to suggest it cannot meet its statutory duty. Neither has the County stated in its Note that the only further development in Wymondham over and above sites with planning permission should be the 1,200 dwellings at Silfield.

2.15 The County's position was confirmed in January 2013 in connection with a report to its Children's Services Overview and Scrutiny Committee which dealt with the implications of pupil number growth with the County Councils. EFM's Client was concerned that the report being put to members was not sufficiently clear that housing numbers might change, with consequential implications for the education planning proposals contained in the report. In terms of spatial planning, the County as LEA should respond to the adopted spatial strategy.

2.16 Emails were exchanged on this matter and Mr Chris Hey, Head of Places, Planning and Organisation (the author of the report) confirmed as follows: *"I can assure you and your client that the County Council is not tied to the position in the Baseline assessment in so far as it relates to the extent and impact of eventual/actual housing development. Our eventual position will be determined by a number of factors, not least views in local consultation when that stage is reached."* (Appendix 2).

3 Wymondham High Academy Trust's Letter (DV4)

3.1 This submission takes the form of a letter in advance of a meeting that was due to take place on 9th March 2012 at SNDC offices. The letter confirms the independence of Wymondham High Academy from the County and seeks that SNDC involves the Wymondham High Academy Trust in consultations.

3.2 The Wymondham High Academy Trust view is that a new school would be needed to deal with more than 2,200 dwellings, and accepts that at 2,050 pupils the school would be *"right at the top end of, and arguably slightly above, what is feasible for a secondary school"*. There are, indeed, relatively few schools of this size in the county.

3.3 Information from the DfE³ shows there are about 3,000 schools providing secondary education (excluding "middle deemed secondary" schools). The school with the greatest number of pupils has 2535 on roll (January 2012 data). There just 20 schools (less than 0.7% of the total) with 2050 or more pupils on roll.

³ School_level_schools_pupils_2012.xls

3.4 The letter considers growth beyond 2,200 dwellings and in effect makes the case that a new secondary school would be required. Consequently Wymondham High Academy Trust concludes that growth should be capped, but does not consider the consequence of this beyond the plan period. If this view were to be accepted, as noted above at paragraph 2.12, the consequence of the County's recently adopted pupil multipliers would be that development in Wymondham should now be capped at about 1,770 dwellings – and even this figure would be too high, as explained in paragraph 4.12 onwards, below.

3.5 The assertion that 2,200 dwellings should be seen as a maximum figure due to a limitation on the potential to expand Wymondham High is misguided, for a number of reasons including that 2,200 dwellings by 2026 is simply a particular point in time.

3.6 The letter accepts that the current strategy involves compromises:

- The size of the school
- Access by public transport is poor
- The school is in a residential area, poorly served by roads and parking – no doubt causing some local traffic issues that will be exacerbated by the proposed expansion
- The site is too small, by a significant amount

3.7 The school site area is confirmed by the letter as being 84,000 sqm (8.4 ha). The letter states the recommended size for a school of 2,050 pupils is 12 ha (8.4 + 3.6 ha). This is the minimum likely site area requirement given in the current DfE guidance⁴, and the maximum is 13.7 ha.

3.8 The DfE guidance on site area for a secondary school with 1605 pupils (Wymondham High Academy Trust's January 2013 total pupil figure) is 9.7 ha to 11.1 ha, so the school's site is already undersized for the number of pupils on roll.

3.9 The letter also seeks support for additional facilities for the school, by way of an all weather pitch, additional sports and play areas to compensate for the shortfall at the school, and maintaining the openness of existing green spaces within 10 minutes walk of the school in case they are needed by the school in the future. These suggestions serve to highlight some of the shortcomings of the current masterplan for the school.

4 Accommodating Growth Beyond the (Enlarged) Capacity of Wymondham High Academy

4.1 There is an issue that is not considered in either of the two documents (DV4 and DV5) which is "what happens at the end of the Plan Period?" The unstated conclusion from both documents is that a new school will be needed to support continued growth beyond 2026, based on a limiting growth to 2,200 dwellings. Our previous submission suggested a new sixth form campus could be a realistic option. We note that Wymondham High Academy was strongly opposed to this approach when its letter was written, albeit this does not mean that one could not be provided.

⁴ BB98 Briefing Framework for Secondary School Projects, DfES 2004

4.2 Other options we suggested in our previous submission included expanding Wymondham College or establishing a new school entirely.

4.3 The advantages of establishing a second school now include:

- Improved distribution of schools, shorter journeys as a second school would be closer for some pupils.
- Avoids overcrowding of Wymondham High Academy site and other disadvantages of current strategy.
- Would add to diversity of provision, giving greater choice within Wymondham and the surrounding area.

4.4 A new school could be established in Wymondham. This might provide an alternative to some of the expansion works proposed at Wymondham High Academy and perhaps Hethersett High School, and could be a more cost effective way of providing places. In October 2012 the DfE announced that new schools could be built more cost effectively based on new cost and floorspace standards⁵.

4.5 Our previous submission suggested a school for at least 900 pupils could be supported by the levels of development being proposed in the area. There is also the opportunity through the WAAP and site master planning process to identify the site for such a new school.

4.6 There are examples of new schools being provided to support development. A new school would not have to be a “conventional” high school, and we referred in our March report to the possibility of creating an all through (primary and secondary) school. Litcham School and The Icen Academy in Methwold, near Thetford, are examples of all through schools in Norfolk. Countrywide, over twenty mainstream all-through schools are open or proposed to be opened through the free schools program.

4.7 A specific example is Heyford Park Free School⁶, which is being established to provide 840 places in due course, catering for ages 4 to 18+. It is due to open in September 2013 to primary Reception and secondary Year 7 pupils. The school will support development of some 1075 dwellings on the former RAF Upper Heyford base in Oxfordshire.

4.8 Heyford Park Free School will grow as more pupils are admitted each year and will provide 420 primary and 420 secondary pupil places in due course. The secondary capacity will be more than the development itself is expected to create need for, which will enable the school to take pupils from a wider area and take pressure off other secondary schools in Bicester.

4.9 In Wymondham, the establishment of an 840 place all-through school, say in connection with additional growth of up to 1,600 dwellings (above the 2,200 JCS dwellings figure) would be a

⁵ <http://www.education.gov.uk/inthenews/inthenews/a00214951/new-school-designs>

⁶ <http://heyfordparkfreeschool.org/the-school/our-vision>

good fit at primary school level – 420 primary places for an anticipated demand of 406. It would also provide 420 secondary and sixth form places compared to anticipated demand for 304. This would give capacity to accommodate some demand from beyond the development itself (including the additional secondary pupils that are now expected from the level of development that SNDC proposes) and reduce the pressure on other schools such as Wymondham High Academy and Hethersett.

4.10 It is not suggested that an additional 840 place all-through school would necessarily be the best option for Wymondham, but it is without doubt one possible way in which current thinking could be modified in the light of additional housing growth being approved or tested.

4.11 Accordingly, alternative provision of education capacity can be accommodated over and above 2,200 dwellings in Wymondham; and there is no bar, arising from school organisation, to increasing the level of development above that currently proposed - regardless of the updated estimates of secondary pupil demand.

4.12 Furthermore, consideration should be given to the information on housing provision in Wymondham. We are informed by Barton Willmore that the latest update on housing provision in Wymondham indicates that at January 2013 outstanding commitments amounted to 1,240 dwellings and the further allocations set out in the Wymondham Area Action Plan make provision for approximately 1,500 dwellings. This means additional education capacity is needed for 2,740 dwellings. This exceeds, by 576 dwellings, the figure of 2,164 dwellings assumed in the County's Note⁷.

4.13 Thus, not only has the County updated its pupil multipliers but also the number of dwellings on which the plans for Wymondham High Academy have been based, are set to be exceeded.

4.14 The consequence of each of these factors is that the expected number of secondary pupils will be higher than previously assumed by the authorities and the Wymondham High Academy Trust. Consequently the masterplan for the school will not provide sufficient secondary places.

5 Summary of Position

5.1 The suggested treatment of the 2,200 dwellings figure as a maximum goes against strategic planning policy, since the adopted JCS figure is stated in JCS Policy 9 as a minimum. It is also inappropriate in the context of the County's statutory duty, and there is no evidence the County seeks the imposition of such a limit on the basis of being unable to secure additional school places if they are required.

⁷ The County's Note assumes 168 secondary pupils for 1,200 dwellings at Silfield and 135 secondary pupils for "Sites with pp". Dividing the 135 by the County's old pupil multiplier of 14 per 100 dwellings shows this figure equates to 964 dwellings. $1,200 + 964 = 2,164$.

5.2 Furthermore, as set out in the foregoing sections of this response, whilst at first sight it appears from the County’s Note (DV5) that there is a close relationship between planned dwelling growth and the planned capacity of Wymondham High Academy, this is undermined by:

- a) the revision in April 2013 of the County’s pupil multipliers, and
- b) the fact that dwelling numbers will exceed those assumed in the County’s Note.

5.3 Bringing the above considerations together, the expected number of additional dwellings supported by SNDC between now and 2026 is 2,740 dwellings. Multiplied by the County’s current pupil multipliers of 17.3 and 1.7 pupils per 100 dwellings, for secondary and sixth form, gives requirements for an additional 474 and 47 pupils respectively. The total pupil demand for 2026 is compared to the masterplanned capacity of Wymondham High Academy in the table below. There is surplus sixth form capacity to a similar extent as expected in the County’s Note, which the County expects will be taken up as described in the last paragraph of its Note, but there is a substantial shortfall of 173 secondary places.

	Secondary 11-16	sixth form
Existing pupils	1199	406
Pupil multiplier / 100 dwellings	17.3	1.7
Pupils from 2,740 dwellings	474	47
Total pupils in 2026	1673	453
WHA masterplan capacity	1500	543
(Shortfall)/Surplus	(173)	90

5.4 The conclusion is that Wymondham High Academy does not have, and cannot be expanded to have, sufficient capacity to cater for the level of planned growth. Within the plan period, therefore, additional capacity will need to be provided.

5.5 An all-through school could be adapted (in terms of the balance between primary secondary places) to provide a “good fit” with the expected shortfalls in provision arising from the amount of housing supported by SNDC together with that arising from an additional allocation of, say, 1600 dwellings.

6 Conclusions

6.1 The County does not state that dwelling growth in Wymondham should be constrained to suit the masterplan that has been drawn up.

6.2 The County’s recently updated pupil multipliers illustrate the potential risk of focussing on a particular set of assumptions and planning on that basis. The County recognises its duty to

secure places and has confirmed that the position expressed in its Baseline assessment may need to be modified.

6.3 The Wymondham High Academy Trust letter confirms the current masterplan for the school will place considerable pressure on the school and its site, and the support sought for additional facilities highlights shortcomings.

6.4 The County has recently updated its pupil multipliers, thereby increasing the number of secondary pupils expected by 2026. In addition, more dwellings will be completed than have been allowed for in the calculations relied on by the GNDP and SNDC. A shortfall of 173 secondary places is expected as a result of these factors, with no further development beyond what is in the Wymondham Area Action Plan.

6.5 The GNDP and SNDC's suggestion that 2,200 dwellings should be a limit on development is wrong in principle and dwelling numbers are set to exceed this figure in any event. It is also inappropriate for the GNDP and SNDC to seek to use the constraint on further expansion of Wymondham High Academy as justification for constraining development.

6.6 The role of the County is to identify the education needs arising from the adopted spatial strategy and to ensure a sufficiency of school places, not seek to set the spatial strategy based upon the capacity or preferred approach of one school. The County confirms this, and in my view SNDC and the GNDP are misapplying the advice of the County.

6.7 The fact is that additional secondary education capacity will be required within the plan period and an additional allocation at Wymondham could well be part of the solution, perhaps by facilitating delivery of an all-through school⁸. There is already experience of all-through schools in Norfolk, and an all-through school catering for a total of about 900 pupils (or more) would be one way of providing additional secondary provision to meet the expected shortfall whilst also accommodating the needs of, say, an additional 1,600 dwellings.

⁸ An all-through school is a realistic option - such a school is opening in September 2013, providing both primary and secondary places to meet the needs of a new development in Oxfordshire, as well as some capacity to meet needs from the surrounding area.

Appendix 1



Norfolk County Council
at your service

INFRASTRUCTURE, SERVICE AND AMENITY REQUIREMENTS FOR NEW DEVELOPMENT

Planning Obligations Standards

April 2013

General enquiries should be made to Stephen Faulkner (Principal Planner)
on 01603 222752 (email stephen.faulkner@norfolk.gov.uk)

successful provider to occupy.

- 2.7. The County Council also has a duty to ensure a sufficient supply of early years places, for 2, 3 and 4 year olds, and to work with providers post-16 to ensure a sufficient supply of places for those age groups.
- 2.8. The Government's current Free School Programme (September 2013 start-up) is supporting one post-16 School in Norwich and an Alternative Provision Free School in Thetford. Free schools add to the supply of places but are not necessarily proposed or approved coherently with the overall LA plans for the strategic supply of school places. Where they do meet a shortfall of places, they would be supported by the County Council.
- 2.9. In order to assess the number of new children likely to arise from a new development the County Council has undertaken an analysis of recent development in the County (2012) which has resulted in the use of the following pupil generation figures¹ (based on 100 dwellings):-

Table 1

Age range	No. years cohorts	Type of school	Multiplier (no. of Children)
3 - 5	2	Pre - School	9.6
5 - 11	7	Primary	26.1
11 - 16	5	High	17.3
16 - 18	2	Sixth Form	1.7
Total			54.7

- 2.10. The above multipliers are applicable for all residential developments although the following allowances are made:
- No children are assumed on development comprising 1-bed accommodation or sheltered housing (i.e. no contributions are sought);
 - For flats, apartments and maisonettes the above multipliers are discounted by a factor of 50% reflecting the fact that fewer children are likely to arise from these types of dwellings.

Catchment Schools

- 2.11. The County Council will expect pupils generated from any new development in the first instance to attend the catchment school as set out in its statutory admissions documentation. However, if the catchment school is at full capacity, the County Council **may** consider the next nearest school with places providing:

¹ The County Council on a regular basis reviews these pupil generation figures.

Appendix 2

Subject: RE: Local Growth and Investment Planning - Baseline Assessment of Implications of Pupil Number Growth
From: "Hey, Chris" <chris.hey@norfolk.gov.uk>
Date: 24/01/2013 22:35
To: <jan@efm-ltd.co.uk>

Dear Mr Kinsman,

Thank you for this confirmatory email. Seeing it in writing, it is clear to me that the points you make are generally implicit in the report and are certainly understood by myself and other officers involved in these matters. Panel discussion confirmed that the issues are understood at Member level too.

I made reference to the generality of your points in my necessarily short introduction to the item.

I can assure you and your client that the County Council is not tied to the position in the Baseline assessment in so far as it relates to the extent and impact of eventual/actual housing development. Our eventual position will be determined by a number of factors, not least views in local consultation when that stage is reached.

You will have noticed the phrase 'basis of dialogue' and that is exactly what the document is. Given that, I did not consider there any basis for proposing an amendment to the published recommendation and it was that which was agreed.

There are a number of points from you email which I will be able to reflect in a future version, together with some raised by Members today. I am grateful to you for having taken the trouble to contact me.

Yours sincerely,

Chris Hey

From: jan@efm-ltd.co.uk [mailto:jan@efm-ltd.co.uk]
Sent: 24 January 2013 11:18
To: Hey, Chris
Subject: Local Growth and Investment Planning - Baseline Assessment of Implications of Pupil Number Growth

Dear Chris

Thank you for talking with me yesterday afternoon. I am writing in confirmation of some concerns about the above titled report, which is due to be considered by members this afternoon.

I have a Client with substantial housing development interests in Norfolk. I confirm, as requested, that my Client is not an elected member and nor are they related to any elected member.

My Client's concern, which I share, is that not all members will be fully aware of the exact status of the various Local Plans and associated work and consequently the potential for the position set out in Section 10 "Assessing Likely Growth" to need to change.

I appreciate that Section 6 in the Appendix provides some information on Local Plans, and I assume that the report can be said to present the position based on the best information available at present - I am not familiar enough with all the detail to know whether that is actually correct. However, the report does not explain that there are ongoing processes which could result in significant changes to the amount and distribution of housing at a local level. On specific points, my understanding is that the figures in the Joint Core Strategy for the Greater Norwich Area (Policy 9 onwards) are minimum figures and no maxima are set; the Joint Core Strategy is still not in a final full approved form and as such changes could lead to alternative strategies; and the report refers to a sites having been allocated -

whereas there are not, in fact, formal policy allocations in place at this time.

Such changes could lead to alternative strategies for education provision being more appropriate, and I think it is important that members are clear about this when endorsing the Baseline Assessment this afternoon. Amongst other things, this will ensure that at officer level the County is not unduly "tied to" the position in the Baseline Assessment. You indicated you will have an opportunity for some additional information/clarification when introducing the report (although I understood you to say such comments would not be minuted). However, I ask that you bring the contents of this email to members attention, and I would also like to suggest that further consideration is given to the wording of the first resolution, perhaps adding along the lines of "subject to appropriate adjustments to cater for any revisions to the distribution of housing".

I would also comment, in relation to paragraph 6.4, that it is people having children which is the fundamental driver of demand for school places. What new housing does is to influence where people will live, and thereby affect the distribution of demand.

Please let me know if you have any queries about the above comments.

I would be grateful if you could briefly respond to this email after the Panel meeting, to let me know whether any clarification along the lines I have suggested was either given or sought at the meeting. Many thanks.

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Regards,

Jan Kinsman

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email: jan@efm-ltd.co.uk

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