[redacted]
nplaw
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by email only to
clerk@salhouseparishcouncil.gov.uk

Your Ref:		Please ask for:	[redacted]
My Ref:	FUL/2026/0019	Tel:	[redacted]
Date:	28 October 2026	Email:	[redacted]

Dear Salhouse Parish Council,

RE: Planning Application FUL/2026/0019 Salhouse C of E Primary School, Cheyney Avenue, Salhouse, Norwich, NR13 6RJ

Norfolk County Council ('NCC') is in receipt of Salhouse Parish Council's ('SPC') letter dated 9 October 2026 relating to the content of planning application FUL/2026/0019 ('the Application') and the Planning (Regulatory) Committee that took place on 25 September 2026 which, amongst other matters, heard the Application.

NCC has provided a response both as the County Planning Authority and, separately, the Education Authority. Each response is set out below accordingly.

This letter does not restate the matters addressed in SPC's letter relating to the background details of the application.

NCC as County Planning Authority's Response:

This part of the letter acts as NCC's response as County Planning Authority ('CPA'). It does not state the position, reasoning, or justification on behalf of the applicant for the Application (the County Council as Education Authority).

The CPA acknowledges the confusion caused as a result of the mistake by the democratic services officer when announcing the outcome of the members' votes on the Application. This was an unfortunate simple misunderstanding by the officer that was quickly corrected following the advice of the legal officer present and clarified to all present at the committee.

To confirm, the vote on FUL/2026/0019 received:

- 3 votes in favour,
- 0 votes against,

- 8 abstentions.

Under NCC's constitution a vote at the Planning (Regulatory) Committee is carried by simple majority, i.e. where the motion receives more votes in favour than against. As is clear from SPC's letter, SPC acknowledges that the motion received more votes in favour than against. The vote was therefore passed, and the resolution was to delegate authority to the Lead Director as per the recommendation in the officer's report.

The CPA acknowledges that there were more abstentions than votes in favour or against. However, a member being able to abstain from a vote is fundamental element of the democratic process. The number of abstentions does not call into question the validity or veracity of the outcome of the vote and the pursuant decision, nor does it suggest maladministration. To question the validity of the decision based on the number of abstentions implies that those who abstained were more likely to vote against than in favour – that would be an improper and flawed assumption.

With regards to the objections raised, including those by SPC, these were addressed in the officer's report and during the meeting. SPC's primary question in its letter as to 'why a rural village school in Salhouse is being expanded to provide additional places arising, at least in significant part, from housing development in Rackheath', was addressed and explained at committee. The CPA understands that the applicant as Education Authority has also provided further explanation in its response below.

Given that planning permission has now been issued there is limited scope to revisit the Application or the validity of the permission. The opportunity to do so exists through legal challenge through Judicial Review and given there is a strict timetable in which to challenge a planning permission, should you wish to follow this path you may wish to seek legal advice in this respect. NCC's formal complaint process does not provide an opportunity to raise debate against the merits of a planning application.

SPC has requested NCC provides clear evidence of a number of matters relating to financial considerations and alternative education provision. SPC's questions regarding financial considerations and alternative education provision have been passed to the Education Authority for consideration and response.

NCC as Education Authority's Response:

This part of the letter acts as NCC's response as Education Authority responsible for the Schools Service and applicant for the Application. It does not state the position, reasoning, or justification on behalf of NCC as the CPA.

In response to SPC's question 'why a rural village school in Salhouse is being expanded to provide additional places arising, at least in significant part, from housing development in Rackheath', NCC as the Education Authority provides the following comment:

Whilst we recognise the concerns of local residents, our priority is to ensure there are enough school places in the Rackheath and Salhouse areas to meet the needs of these growing communities. There is significant development happening in the area and Rackheath Primary School is full, with no space to expand.

A new primary school is part of the plans for the large Rackheath development but this is some way off and the extra places are needed because of local demand for places – we are expecting between 50 and 60 children to start in reception at Rackheath Primary School in the coming years and there are only 30 places available. The new school is still part of the longer-term plans for the area.

Increasing places at Salhouse will also mean the school can move away from mixed age classes, which is better for teaching and learning. This is the best option for children in what are a difficult set of circumstances.

The plans were approved by the committee, despite a number of abstentions and we now need to move ahead to deliver the extra places for the new school year. We are putting in place measures to mitigate residents' concerns, including extra staff parking and plans for a walking taxi.

SPC has also requested that NCC provide evidence in response to a number of questions asked. NCC as Education Authority has provided the following responses:

1. ***The number of current pupils who live within Salhouse Parish.***

The available data identifies 86 primary-aged children (Reception to Year 6) resident within Salhouse Parish.

This figure must be considered in the context of how school-place planning operates. The number of children currently living within the civil parish, or currently attending an individual school, does not in isolation determine either the appropriate size of that school or the requirement for future capacity.

School-place planning considers a wider range of factors, including current and forecast demand, the capacity and constraints of neighbouring schools, pupil movement between school service areas, parental preference, housing development and the timing of planned new infrastructure.

2. ***The number [of current pupils] who live outside the parish, including those from Rackheath.***

There are currently 137 attending Salhouse Primary school (January Census 2026), 32 of those primary-aged children resident in the Rackheath service area attending Salhouse Primary, compared with 65 children from the Salhouse service area, the remaining children attend from places such as Little Plumstead, St John's Hoveton, Blofield, Garrick Green schools.

NCC recognises that a proportion of pupils attending Salhouse C of E Primary School live outside Salhouse Parish. This should not, however, be interpreted as evidence that those pupils are necessarily accessing provision inappropriately or that capacity should only be provided within the parish in which a child resides.

Current evidence demonstrates significant pupil movement across this local school network. NCC's October 2026 assessment records 347 primary-aged children living within the Rackheath catchment, compared with 206 places at Rackheath Primary School, with 192 of those children attending Rackheath Primary. Salhouse is specifically identified among the alternative schools attended by children resident within the Rackheath catchment.

There is therefore already an established relationship between demand arising within the Rackheath area and provision across neighbouring schools. This is particularly relevant when considering further housing growth and the limited capacity of the existing Rackheath school.

3. ***The projected additional demand [on school services] arising from existing and planned Rackheath development.***

NCC's assessment is based not simply upon current pupil numbers but upon the anticipated demand generated through existing commitments and planned housing development, alongside the established pupil population.

There is significant committed and planned growth across Rackheath and the wider area. This growth does not translate into pupils appearing at one single point in time. Housing delivery is influenced by build-out rates and the housing market, while the age profile and timing of families occupying new homes means that school-place demand emerges progressively.

Across the housing applications in the wider Rackheath area, there is potential for in excess of 4,400 further homes to be delivered. Based on an anticipated build-out rate of approximately 150 dwellings per year, the current pupil-yield assumptions indicate that this level of annual housing delivery could generate approximately 44 additional primary-aged children per year. The 4,400-home development pipeline would not be occupied at one point in time. Rather, pupil demand would emerge progressively as housing is constructed and occupied. This does not include the potential for additional housing to come from Beeston Park.

The figure of 44 should be regarded as an estimated pupil yield associated with the assumed annual rate of housing delivery, rather than a forecast that exactly 44 additional pupils will materialise each year. Actual pupil numbers will depend upon factors including the timing and rate of housing delivery and the characteristics of households occupying the new development.

From a school-place planning perspective, NCC therefore needs to consider how this cumulative additional demand can be accommodated as housing is delivered, alongside the capacity of existing schools and the timing of planned strategic education infrastructure.

This illustrates the cumulative nature of the issue. The requirement for additional capacity is not dependent upon one development or a single year's pupil forecast. NCC must ensure

sufficient capacity exists while development continues and before the larger strategic education infrastructure is available.

4. ***Why Salhouse C of E Primary School is considered the appropriate location for this additional capacity.***

Salhouse has been identified following consideration of how the existing local school network can respond to growth pending delivery of the strategic schools planned as part of the major developments.

A significant constraint is Rackheath Primary itself. The existing school and site provide approximately one form of entry, or 30 children per cohort, and cannot be further expanded to accommodate the anticipated growth.

The existing response also records 215 pupils against a stated capacity of 206 at Rackheath Primary.

The alternative is not simply to direct additional demand towards White House Farm. The further analysis indicates that capacity there is largely occupied through higher preference from Sprowston, limiting its ability to absorb flows from Rackheath. Within this context, Salhouse is identified as the reasonable alternative within the existing network in the short term.

Importantly, the proposal also has a second purpose. The evidence identifies local Salhouse intake at around 8 to 10 pupils per year without the additional demand generated through preference from Rackheath. The proposed investment would enable Salhouse to move towards a sustainable 1FE structure, providing a stronger organisational basis for the school's future.

The investment should therefore not be characterised simply as expanding a school in one village to accommodate development elsewhere. It provides additional permanent capacity within an established local school network while simultaneously supporting Salhouse C of E Primary School to establish a more stable and sustainable educational structure for the longer term.

NCC therefore considers the proposal in terms of the combined needs of the local school network, rather than on the basis that every pupil generated within Rackheath must be accommodated at Rackheath Primary. The proposed expansion provides additional permanent capacity while the strategic schools are progressed, while at the same time supporting Salhouse C of E Primary School to operate on a more stable and sustainable 1FE basis.

5. ***How the £2.5 million project represents value for money.***

The £2.5 million referred to represents the capital funding allocation available for the scheme rather than confirmation that the full sum will necessarily be spent.

The construction works will be subject to NCC's procurement and tendering arrangements, through which the final cost of delivering the scheme will be established and value for money tested.

The scheme also needs to be considered in terms of what the investment provides. It is not limited to the provision of two additional classrooms. The project includes associated works and some internal remodelling of the existing school once the new accommodation has been completed, enabling the school to make more effective use of its accommodation.

Importantly, the proposal provides permanent educational accommodation. If pupil demand changes over the longer term, permanent accommodation retains value and flexibility for the school and can potentially support changing educational requirements, including provision for pupils with SEND. It is therefore materially different from investment in short-life temporary accommodation.

NCC considers value for money through the overall benefit and useful life of the investment, alongside the requirement to secure the school places necessary to fulfil its statutory place-planning responsibilities.

6. ***Whether temporary accommodation, including mobile classrooms, has been properly assessed within Rackheath.***

Provision of temporary accommodation was assessed as an alternative.

Temporary accommodation is now much more challenging to deliver. It is likely to require a planning application but likely to only have 2 years permissions available for the modular building due to changes to building regulations. This is less cost effective than permanent buildings.

If for any reason, the additional places are not needed, the permanent improvements to Salhouse C of E Primary School's accommodation will allow the school more flexibility, for example to support children with SEND.

7. ***How the proposed expansion fits within the longer-term education strategy for Rackheath, Broadland Gate and Beeston Park.***

The Salhouse expansion forms part of a phased response to growth and should not be viewed as an alternative to the longer-term strategic school provision planned for Rackheath, Beeston Park and the wider Broadland growth area.

A particular challenge in school-place planning is managing the period between housing development beginning and the point at which major new education infrastructure can reasonably be delivered. Smaller developments and early phases of larger developments can cumulatively generate additional pupils before sufficient development has taken place to trigger or support delivery of a new school.

Housing trajectories provide an indication of when development is expected, but actual delivery is affected by the housing market and individual developers' build-out programmes. Pupil forecasting can identify the emerging pattern of demand, but the precise year in which individual families move into new dwellings and require a school place cannot be known with absolute certainty.

At Rackheath, the strategic approach makes provision for two primary schools and a new secondary school**,** with the first primary school site associated with the first phase of approximately 4,000 homes. The relevant S106 arrangements for the Rackheath site are

expected to include a trigger relating to transfer of the school land. As a new primary school can take around three years to deliver once the necessary prerequisites are in place, and potentially longer depending upon individual circumstances, there is necessarily a period during which additional demand must be accommodated through the existing school network.

This position is reflected in NCC's current infrastructure assessment, which expressly recognises that the strategic development will take place over an extended period and that the planned education infrastructure is therefore unlikely to be available during the early years of development.

The same strategic principle applies across the wider growth area. The Beeston development safeguards land for further primary provision within its approximately 3,000-home development, while other education sites are identified across the wider area, including Broadland Gate.

The key distinction is therefore between nearer-term capacity and long-term strategic capacity. The expansion of Salhouse is intended to help manage the former. The planned new schools at Rackheath and elsewhere address the latter.

Accordingly, investing in Salhouse does not represent a departure from the strategy of providing schools within the communities created by major strategic development. Rather, it provides additional capacity within the existing network so that NCC can meet its school-place responsibilities during the transition to that strategic provision.

In summary, NCC recognises the Parish Council's concern that major housing growth should ultimately be supported by appropriately located education infrastructure. That principle is reflected in the long-term strategy for Rackheath and the wider Broadland growth area. However, strategic schools cannot necessarily be delivered at the point at which the first additional pupils require places. The Council must therefore also ensure sufficient capacity exists within the current school network during that intervening period.

The case for Salhouse should consequently not be considered simply by reference to the number of vacant places at the school today, or the proportion of its present pupils who live within Salhouse Parish. It needs to be considered against existing pressure at Rackheath, established movement of pupils between these communities, forecast demand, continuing housing delivery, the physical constraints affecting existing provision and the timing of planned strategic schools. Salhouse provides part of the nearer-term response to those pressures while new infrastructure continues to form the longer-term solution.

Yours faithfully,

[redacted]
Solicitor (Planning & Environment)
nplaw