Planning for Schools
Development Plan Document

Adopted 10th May 2016
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Why produce a Planning for Schools Development Plan Document (DPD)?

1.1 The Council has a statutory duty to provide school places. It is widely recognised that there is an urgent need to deliver additional primary and secondary school places in the borough to accommodate an increase in demand, having regard to the rising birth rate and school roll projections. Despite the Council facilitating an on-going programme of extensions since 2008, up to a further additional 3.5 Primary forms of entry (FE) need to be provided by September 2016 and 19 Secondary FE need to be provided by September 2019 beyond the existing agreed expansion programme.

1.2 The objectives for this DPD are therefore:

- To ensure the number of primary and secondary school places provided meets the needs of the borough
- To provide safe, convenient and accessible locations for primary and secondary schools
- To promote good design and space standards for schools

1.3 This Planning for Schools DPD provides policy direction to establish how this need could potentially be met. A DPD is a formally recognised planning document which forms part of the Council’s suite of documents known as the Local Plan. This particular DPD helps to clearly establish the Council’s approach to providing Primary and Secondary school places for the borough’s population and helps to identify sites which may be suitable for providing them, whether by extension or on new sites.

1.4 The Plan period is to 2021. This is based upon the evidence of need and projection figures for pupils who will enter secondary school in September 2021.

How is the DPD structured?

1.5 Section 2 provides a brief overview of the relevant legislation, education and planning policy context.

1.6 Section 3 outlines more detail on existing school provision in the London Borough of Ealing and the future need for school places.

1.7 Section 4 sets out the Council’s approach to accommodate this need, having taken into account the responses to consultation and the Call for Sites. The sites shortlisting methodology and outcomes are outlined and the short list of sites the Council proposes to designate for new or expanded school provision is set out.

1.8 Section 5 sets out the Council’s polices to help facilitate the provision of schools in the right places, and to protect identified sites for education use to meet the identified need. It also includes detail on monitoring and review following adoption.

1.9 Appendix 1 provides individual site maps and information on the sites allocated through this DPD for extensions to existing or new schools.

1.10 Appendix 2 lists the extensive range of background reports which were commissioned or referenced during the production of this DPD.
1.11 Whilst this document includes reference to sixth form and Special Educational Needs (SEN) provision to provide a wider educational context of the borough, the purpose of this DPD is to plan for primary and secondary schools only.

1.12 In recognising the urgency in delivering school places, and acknowledging the competing demands upon land in the borough for other uses, the Council has previously commissioned various site searches for schools. These were outlined in the Issues and Options document 2013 (Section 4) and an initial long list of 25 sites which were at the time considered to be potentially suitable for the delivery of extensions to and/or new build of primary or secondary schools was included as Appendix 1 of that document, together with links to other relevant background reports to the DPD.
Legislative framework

2.1 The London Borough of Ealing is preparing a Local Plan for the borough (previously known as the Local Development Framework), currently a portfolio of five development plan documents which set out the desirable location for new development over the next 15 years, and the policies used to assess planning applications. Local Plans must be in conformity with higher tier plans and policies including the National Planning Policy Framework (NPPF) (March 2012) and the London Plan (July 2011/ Further Alterations March 2015).

2.2 The NPPF sets out the Government’s planning policies and how these are expected to be applied. With regard to the availability of school places the NPPF confirms that:

“The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

• Give great weight to the need to create, expand or alter schools; and
• Work with schools promoters to identify and resolve key planning issues before applications are submitted” (para 72)

2.3 Further, in relation to Green Belt, the NPPF at para 81 confirms:

“Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; ...’

2.4 NPPF para 89 also confirms exceptions to inappropriate construction in the Green Belt which include:

• ‘provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;’

2.5 The London Plan 2011 (Policy 3.16) sets out how social infrastructure should be planned for to meet the needs of a growing population and of new developments. It encourages the extended use of highly accessible community facilities to help the effective use of resources and land as well as joined up service delivery. The policy confirms a criteria based approach to the provision of social infrastructure facilities and the expansion of existing facilities. It states that this infrastructure should be:

• Easily accessible to all sections of the community (including disabled people and older people) by meeting inclusive design principles.
• Easily accessible by walking and cycling.
• Well connected to public transport.
• Affordable and compatible with social infrastructure service delivery plans.
• Well laid out and flexible, so that all the space is used efficiently.
• Safe and user friendly.
• Integrated with or complementing other neighbouring facilities or services as part of achieving a lifetime neighbourhood.
Policy 3.18 of the London Plan then sets out how local authorities should plan for education facilities. The policy supports the objectives of the NPPF with regards to the provision of school places to enable greater educational choice through new build, expansions and change of use. The policy encourages development proposals which “maximize the extended or multiple use of educational facilities for community and recreational use” on school premises and “the co-location of services between schools and colleges and other provision [...] in order to maximize land use, reduce costs and develop the extended school [...] offer”.

The Council’s Development (or Core) Strategy was adopted on April 3rd 2012. It sets out the overarching vision for the development of the borough over the next 15 years. In relation to planning for schools, Policy 1.2 (d) requires the Council:

“To make provision of appropriate physical, social and green infrastructure in the right locations and at the right time to support the levels of housing and employment growth to be delivered in Ealing, and maintenance of an Infrastructure Delivery Plan and Schedule, indicating the phasing and funding of infrastructure development.”

With specific reference to schools, Policy 6.2 Social Infrastructure of the Development Strategy seeks to:

“Increase capacity at primary and high schools and provide new schools for the increase in population where capacity cannot be met. Deliver planned increases in capacity at existing schools. Plan for good bus and rail links for high schools that have a wide catchment area”.

In relation to open space, Policy 6.3 Green Infrastructure of the adopted Development Strategy refers to the Infrastructure Delivery Plan and its role in identifying improved/enhanced provision and maintenance of green infrastructure including:

“Open Space (including Parks, Green Belt, Metropolitan Open Land and Green corridors) - provide new green spaces where possible to address identified deficiencies in areas of play, local and district park deficiencies, and to implement projects to enhance and increase access to and utilisation of parks, Green Belt and MOL.’

In order to promote sustainable travel, facilities associated with the school for wider shared community and recreational use should be located within accessible locations within the site.

The Council’s Infrastructure Delivery Plan (IDP) and schedule sets out what key infrastructure is planned in the borough with an aim to help rationalise provision by identifying gaps and contingencies affecting the delivery of services. The need for new primary and secondary school places was identified as part of Ealing’s IDP and infrastructure delivery schedule (July 2011 and February 2014), and included contingencies relating to funding and population growth. It commits to regular monitoring of pupil projections in order for the need for additional provision to be programmed into the Local Plan process at an early stage.

This Planning for Schools DPD responds to these trends and positively plans for primary and secondary school place provision in the borough, including promoting increased access to facilities associated with the schools to the wider community.’
Standards of school provision

2.13 Statutory standards with regards to the design and layout of new schools are contained within the 2012 School Premises Regulations that came into force in October 2012. These regulations require that a suitable outdoor space must be provided in order to enable physical education to be provided to pupils in accordance with the school curriculum; and pupils to play outside. The prescriptive minimum playing field area requirements have been removed.

2.14 Whilst playing fields at existing maintained schools are protected under Section 77 of the School Standards and Framework Act 1998 it is recognised that many school sites do not have such provision. Where suitable outdoor space cannot be accommodated, pupils need to be provided with access to off-site provision.

2.15 The Department of Education Building Bulletin (BB) 103: ‘Area guidelines for mainstream schools’ (June 2014) and accompanying notes (March 2015) set out non-statutory area guidelines for school buildings (part A) and sites (part B) for all age ranges from 3 to 19. It covers all state schools, including mainstream academies and free schools, except special schools and alternative provision. The document aims to assist building professionals, school sponsors and those involved in creating a design brief for new school buildings, school refurbishment or conversion projects. As such, this guidance has been used for reference in the site assessment process.

2.16 Aspects of detailed design and impact against which subsequent planning applications will be assessed are provided in the Council’s Local Plan documents, including the London Plan and Development Management documents. Detailed design should include consideration of the historic environment and reference should also be made to Historic England guidance where proposals relate to alterations or extensions to existing school buildings of historic interest.

Funding

2.17 The expansion of school places attracts some ‘Basic Need’ funding from the government.

2.18 Funding for new school places is currently provided from a number of sources:

- Grant from Department for Education (DfE)
- Council capital funding
- Council borrowing
- Section 106 contributions

2.19 At present free schools are funded directly by DfE. The purpose of the Planning for Schools DPD is to identify site opportunities for school provision. Viability was one of the criteria taken into account in the process of short listing sites.
This section outlines the demographics of the borough in relation to school place planning, confirms the existing primary and secondary school provision, the identified need and the proposed provision of school places.

Demography

Ealing, in line with a number of other London boroughs, has experienced a substantial rise in birth rates over the last decade. In the 1990’s and the early 2000’s the average number of births in each year was in the region of 4,500. Annual birth rates in the borough have increased by 31% in the seven years from 2002/03 to 2010/11. However, birth rates in the borough appear to have reached a peak at 5,843 in 2010/11 (which will be the September 2015 primary intake) and provisional figures indicate there were 5,606 births in the borough in 2012/13.

There is considerable uncertainty at this stage as to whether the recent downturn in births is the beginning of a declining trend; as such the figures will be closely monitored for planning purposes. It is however necessary to plan for these figures whilst recognising that the rates are not rising equally across all areas of the borough. Based on known and projected data, the Council anticipate the highest level of need will be in 2019 and sustained at this level until at least 2021. More precise data will become available over time.

Further detail on birth rates, projections and the methodology for calculating need for school places is available in the background paper on demography ‘Demography, Projections and School Place Planning Methodology’, January 2015. This updates the September 2013 demography background paper published alongside the Issues and Options consultation document.

Existing Provision of Primary and Secondary Schools

The Council has been expanding primary school places in response to local demand since 2008 and in September 2014 there were the equivalent of an additional 35.5 FE or 1061 places in reception classes compared to 2008 levels. This 35.5 FE additional provision comprises 29 permanent FE and 6.5 FE temporary/bulge classes.

In terms of secondary school provision, an additional 2 FE has been created at Dormers Wells High School and a further 6 FE was available at the new William Perkin High School from September 2013.

The Council has also agreed expansion of 131 places for primary aged pupils with Special Educational Needs across the borough’s special schools and Additionally Resourced Provision attached to mainstream schools.
3. FUTURE DEMAND FOR NEW SCHOOL PLACES

### Primary Schools

1. Alec Reed Academy (Primary)
2. Allenby Primary School
3. Ark Priory Primary Academy
4. Beaconsfield Primary and Nursery School
5. Berrymead Infant School
6. Berrymead Junior School
7. Blair Peach Primary School
8. Brentside Primary School
9. Christ the Saviour CE Primary School (infant)
10. Christ the Saviour CE Primary School (junior)
11. Clifton Primary School
12. Coton Primary School
13. Dairy Meadow Primary School
14. Derwentwater Primary School
15. Dormers Wells Infant School
16. Dormers Wells Junior School
17. Downe Manor Primary School
18. Drayton Green Primary School

### Secondary Schools

19. Durdans Park Primary School
20. East Acton Primary School
21. Featherstone Primary School
22. Fielding Primary School
23. Gifford Primary School
24. Grange Primary School
25. Greenwood Primary School
26. Hambrough Primary School
27. Hathaway Primary School
28. Havelock Primary School
29. Hobbayne Primary School
30. Holy Family Catholic Primary School
31. Horsenden Primary School
32. John Perryn Primary School
33. Khalsa Primary School
34. Lady Margaret Primary School
35. Little Ealing Primary School
36. Mayfield Primary School
37. Montpelier Primary School
38. Mount Carmel Catholic Primary School
39. North Ealing Primary School
40. North Primary School
41. Oaklands Primary School
42. Oldfield Primary School
43. Our Lady of the Visitation Primary School
44. Perivale Primary School
45. Petts Hill Primary School
46. Ravenor Primary School
47. Sebourne Primary School
48. Southfield Primary School
49. St Anselm’s Catholic Primary School
50. St Gregory’s Catholic Primary School
51. St John’s Primary School
52. St Joseph’s Catholic Primary School
53. St Mark’s Primary School
54. St Raphael’s Catholic Primary School
55. St Vincent’s Catholic Primary School
56. St John Fisher Catholic Primary School
57. Stanhope Primary School
58. The Edward Betham CE Primary School
59. Three Bridges Primary School
60. Tudor Primary School
61. Vicar’s Green Primary School
62. Viking Primary School
63. West Acton Primary School
64. West Twyford Primary School
65. Willow Tree Primary School
66. Wolf Fields Primary School
67. Wood End Academy
68. Wood End Infant School
69. Ark Byron Primary Academy*

* (Opens September 2015)

### Special Schools

70. St Mary’s CE Primary School
71. Acton High School
72. Brentside High School
73. Dormers Wells High School
74. Drayton Manor High School Academy Trust
75. Ellthorne Park High School
76. Featherstone High School Academy
77. Greenford High School
78. Northolt High School
79. The Cardinal Wiseman Catholic School
80. The Ellen Wilkinson School for Girls
81. Twyford CE High School Academy
82. Villiers High School
83. Alec Reed Academy (High)
84. William Perkin CE High School
85. Ealing Fields High School*

* (Opens September 2015 no identified location)

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3.8 Figure 3.1 shows existing primary school provision of 154.5 FE in the borough (including the 29 FE of permanent expansions added since 2008) and existing secondary school provision of 105 FE. These figures include forms of entry which opened in September 2014.

- **Existing primary school provision borough-wide: 154.5 FE**
- **Existing secondary school provision borough-wide: 105 FE**

**Identified Need: How many new forms of entry are required, where and by when?**

3.9 Need is calculated using roll projection models and takes into account retention rates of those born in the borough, as well as migration levels and other GLA data which factors in anticipated population arising from new housing developments. It is difficult to establish exact figures for need due to the many variables and the time-lag in receiving data which informs need, but the need figures are regularly updated, verified and reported as new evidence is published. Further detail on the methodology for forecasting need is provided in the demography background report 'Demography, Projections and School Place Planning Methodology' (2015) produced by the School Planning and Resources team.

3.10 The need for school places has been previously outlined in various Cabinet reports (most recently April 2014) and in the Council’s Infrastructure Delivery Plan (Sept 2010 and July 2011, and February 2014). Whilst the Council’s Development Strategy plans to 2026, for purposes of this Planning for Schools DPD we have identified need to 2017/18 for Primary and 2021/22 for Secondary schools. Beyond these dates the need figures become less certain; they will however be updated as and when the data to inform the need calculations becomes available.

3.11 The 2015 background paper on demography provides detail on the currently anticipated need (forms of entry/FE required) across the borough, by when, and which areas have the greatest need. In summary:

- **Primary need is 6 FE borough-wide by September 2016**
- **Secondary need is 23 FE borough-wide by September 2019. The earliest and greatest need is in Acton, Ealing and Hanwell.**

3.12 For the purposes of this DPD, the need has therefore been identified based on the most recent demographic data available, as outlined in the 2015 demography background paper. Since the 2013 consultation, the primary need has dropped from 14.5 FE to 6 FE and the secondary need has increased from 21 to 23 FE. The demography background paper outlines the reasons for these changes.

3.13 Whilst we have used the best available data, there will be further demographic changes over time as new and updated sources of information are released and as such, need figures may also be updated.
Planned Provision: Where and when are extensions and new schools to be delivered, and how many FE will they provide?

3.14 Details of the existing agreed programme of provision (with Cabinet approval and planning applications submitted) are included in Tables 1 (for Primary) and 3 (for Secondary) of the demography background paper.

3.15 It should be noted that in the case of foundation and voluntary aided schools any expansion would only be able to proceed with the agreement of the Governing Body or Trustees as the land owners.

- Planned primary provision is 2.5 FE
- Planned secondary provision is 4 FE

3.16 We are also working with other West London boroughs to identify the existing need, capacity and provision of each of their primary and secondary schools. This ongoing work is with a view to establishing any potential for absorbing any capacity and sharing forms of entry and/or new school provision with our neighbouring boroughs over the medium to longer term. As this work progresses, there may be potential for additional shared provision across boroughs of forms of entry and/or new schools. Apart from one site (included in Table 1 of the background paper) which currently provides 1 FE shared primary provision (to an Ealing school but jointly funded by Ealing and Brent) joint borough provision cannot be relied upon to help meet the identified short-term need in Ealing within the timescales required.

3.17 Additional provision may also be provided by Free Schools. Free Schools, which were introduced in England by the Academies Act 2010, are all-ability state funded schools set up in response to demand by local stakeholders independent from the Council. In addition to those currently operating in the borough, e.g. St Mary’s primary (for which there is a need for a permanent site), there has been interest expressed by various groups in providing additional primary and secondary Free Schools. Whilst Free Schools face the same difficulties as the Council in identifying suitable sites, this DPD will help facilitate the provision of such sites in the borough for Free School providers and any such provision will help to meet local need.

3.18 There is currently an Ealing Council Schools Service policy presumption that any new school created will be an Academy or Free School. This reflects the Council’s emerging role as facilitators rather than providers of schools.
Shortfall

3.19 The identified need minus the planned provision figures result in potential shortfalls in provision of school places as below:

- **Primary shortfall is 3.5 FE by Sept 2016** (need of 6 FE minus 2.5 FE planned provision)
- **Secondary shortfall is 19 FE by Sept 2019** (need of 23 FE minus 4 FE planned provision)

3.20 In the 2013 Issues and Options paper, the figures on shortfall presented were lower than that now identified, for both primary and secondary FE. The difference in figures is outlined below:

<table>
<thead>
<tr>
<th></th>
<th>Primary FE shortfall</th>
<th>Secondary FE shortfall</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013 Issues and Options</td>
<td>12 by 2015</td>
<td>21 by September 2019</td>
</tr>
<tr>
<td>2015 Publication Version (current figures)</td>
<td>3.5 by 2016</td>
<td>19 by September 2019</td>
</tr>
</tbody>
</table>

3.21 Reasons for the differences are set out in the updated background demography paper, but primarily relate to changing demographic trends and the Council’s implementation of expansion proposals at a number of existing primary school sites since the DPD Issues and Options stage. However, the issues and options facing the Council remain the same.
The Council’s approach in the Planning for Schools DPD was informed by the outcome of the Issues and Options consultation on the Planning for Schools DPD, which included a potential long list of sites, and a call for sites, undertaken together in 2013, and further work in shortlisting sites.

The 2013 consultation document identified the key issues and options the Council faces in meeting its statutory requirement to provide school places for the borough’s population. Using the data on need for and planned provision of primary and secondary school places at that time, it identified the issue of a shortfall of school places to meet the identified need, and set out the alternative options to accommodate this need. These were:

- Option one: do nothing
- Option two: expand existing schools on primary and secondary sites
- Option three: identify new sites

Option one (do nothing) was discounted as not meeting the identified shortfall. The Council’s work in progressing option two (expanding existing sites) was outlined and evidenced in the demography background paper and Issues and Options consultation document (and is ongoing). Option three (search for new sites) is justified as the Council’s preferred option, had the majority of responses in support from representations received, and, in the absence of any alternative options being put forward is considered the only way to help meet the identified shortfall.

As such, the Council has continued to plan positively. Work on identifying new sites for expansion and/or provision of new schools has progressed, and shortlisting of sites was undertaken in accordance with the criteria outlined and the representations received in response to Issues and Options consultation. The Council’s responses to representations received and new sites suggested in response to the call for sites, as well as the Sustainability Appraisal, are set out in more detail in the Council’s DPD background documents.

### Site selection methodology

In addition to the Council’s own attempts to find suitable sites, various site searches were commissioned since December 2010 in response to the identified need for new schools and extensions. Details of these are listed in the 2013 Issues and Options paper (p16).

A summary of the methodology and outcomes of the current sites shortlisting process and a spreadsheet identifying all sites considered for the Planning for Schools DPD (including those received in response to the call for sites) are outlined in Municipal Projects Planning for Schools DPD – evidence Note Phase 2 (November 2014). The methodology is also summarised below.
4.7 Identification of new sites for new schools and extensions for existing schools has been undertaken in several stages:

- Identify Planning Policy compliant sites, including Council owned sites. This relates to sites which currently have a land use or designation compatible with educational or other community use.

- Identify other new sites. This relates to sites which have existing land use or designations other than for education or community use.

4.8 Whilst it would be the Council’s preference to provide school places on policy compliant sites, including Council owned sites and other Council land holdings, it was also considered appropriate to include certain sites from the Development Sites DPD, Council’s Property Strategy and Infrastructure Delivery Plan in the initial long list of sites. It was also confirmed that if some/all policy compliant sites became excluded at subsequent stages of the DPD process, the Council may have no choice but to consider building school extensions or new schools on sites currently designated for other uses / purposes in order to meet identified need for school additional places. It was therefore prudent to extend the identification of sites at long listing stage to include sites designated for other uses / purposes.

4.9 Officers reported on progress of the Planning for Schools DPD in a report to the Council’s Cabinet meeting on 21st October 2014. Cabinet authorised the Leader of the Council and Executive Director of Regeneration and Housing to confirm the shortlist of sites and draft policy wording for consultation, and for officers to progress the DPD to adoption. (Links to the relevant Cabinet report and minutes of the meeting are provided in the list of background documents at Appendix 2 of this document).

**Sites short listing criteria**

4.10 In addition to long listing criteria of site policy compliance and area of need, short listing criteria included site deliverability, public transport accessibility and proximity to playing fields. Deliverability included an assessment of the likelihood of the site to provide school intake by the date required, including consideration of site circumstances, availability, ownership, and viability. The shortlisting process was also informed by the outcome of the Sustainability Appraisal of the sites.

4.11 The viability work was commissioned on ten potential school sites from the Council’s long list of sites, to test the ability of those sites to viably provide schools in accordance with the objectives of the Planning for Schools DPD, other planning policy requirements and viability guidance. These ten sites were chosen for viability testing from the Council’s long list as those sites which were identified (with one exception) as policy compliant town centre/mixed use sites considered to have potential to deliver school places to meet the identified need. Of these ten sites, the viability report identified two potentially viable sites for school use, relying upon mixed use development of a school with residential development (50% affordable in accordance with the Council’s policies) and a further four sites if the mixed use incorporated 100% private housing.
4.12 Without prejudicing the assessment of any subsequent planning application, the viability report made assumptions on potential density for each site, taking into account the site’s context and adjacent uses. The full report is set out in the ‘Planning for Schools DPD – Viability Assessment’ (February 2015) report by BNP Paribas Real Estate, published as a separate background document to this DPD.

4.13 Importantly, however, whilst the sites identified as viable in the BNP Paribas report were fully considered, none of them have been taken forward in the Council’s short list of sites on other grounds. The justifications are set out in the spreadsheet appended to the Municipal Projects Phase 2 report published as a separate background document to the DPD.

**Short list of sites**

4.14 This Planning for Schools DPD identifies a short list of eight sites set out in Table 4.1 (pg14). The justifications for short listing each site are set out in the spreadsheet appended to the Municipal Projects Phase 2 report, in accordance with the previously identified long and short listing criteria, the results of the Sustainability Appraisal, and other site-specific circumstances.

4.15 Since the long-list of sites was published (at Issues and Options stage), some additional sites were included for consideration where the opportunity arose and/or it was considered they had potential for use either as a new school or extension to existing school. Any sites added for consideration were subject to the same short listing criteria and sustainability appraisal as the previously identified sites.

4.16 The Council has also indicated the proposed type of provision (as primary or secondary) on each site and commenced assessments of the potential FE that each short listed site could potentially deliver.

4.17 In anticipation of fluctuations in population change and therefore in demand for school places, it is appropriate to consider whether the short listed sites may be suitable for temporary or permanent provision of school places. This is to provide some of the required flexibility in accommodating the changing need, and to avoid any potential for overprovision of permanent school places in the longer term. The proposed nature of provision as temporary or permanent also informed the site assessments undertaken as part of the Sustainability Appraisal.
Table 4.1 - Short List of Sites

<table>
<thead>
<tr>
<th>Site Reference</th>
<th>Site</th>
<th>Type of Provision</th>
<th>Potential FE</th>
</tr>
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<tbody>
<tr>
<td>S-ACT2</td>
<td>Acton Park Depot, The Vale, Acton</td>
<td>New primary</td>
<td>2</td>
</tr>
<tr>
<td>S-HAN4</td>
<td>42 Lower Boston Road, Hanwell</td>
<td>Primary bulge</td>
<td>0</td>
</tr>
</tbody>
</table>

**Primary Provision**

**Secondary Provision**

<table>
<thead>
<tr>
<th>Site Reference</th>
<th>Site</th>
<th>Type of Provision</th>
<th>Potential FE</th>
</tr>
</thead>
<tbody>
<tr>
<td>S-HAN1</td>
<td>Eversheds Sports Ground, Hanwell</td>
<td>Secondary temporary expansion / bulge</td>
<td>0</td>
</tr>
<tr>
<td>S-GNP2</td>
<td>Land adjacent to Greenford High School, Ruislip Road, Greenford</td>
<td>Secondary expansion</td>
<td>2</td>
</tr>
<tr>
<td>S-EAL4</td>
<td>Former Barclays Sports Ground, Park View Road, Ealing</td>
<td>New secondary</td>
<td>6.5</td>
</tr>
<tr>
<td>S-EAL6</td>
<td>Former King Fahad Academy, Little Ealing Lane, Ealing</td>
<td>New secondary</td>
<td>4</td>
</tr>
<tr>
<td>S-ACT7</td>
<td>Land rear of Twyford High School, Uxbridge Road, Acton</td>
<td>Secondary temporary expansion / bulge</td>
<td>0</td>
</tr>
<tr>
<td>S-ACT8</td>
<td>Acton College, Gunnersbury Lane, Acton</td>
<td>New secondary</td>
<td>6</td>
</tr>
</tbody>
</table>

4.18 It remains the Council’s preference to build upon policy compliant sites (i.e. sites currently designated as acceptable in principle for community/school/associated uses). However, some policy compliant sites were excluded at shortlisting stage due to deliverability or other grounds/and/or because an inadequate amount of new suitable policy compliant sites have come forward. The Council has, therefore, no choice but to shortlist some sites currently designated for other uses/purposes if it is to meet the identified need for school places. The justifications for site shortlisting are included in the spreadsheet appended to the Stage 2 Municipal Projects report, published separately as a background document.

4.19 It is also recognised that given that some of the sites currently shortlisted are designated as MOL, the proposed safeguarding of the sites for schools provision is inconsistent with that policy designation. This has however been addressed by the Council through de-designating all or part of the sites currently designated as MOL on the basis that there are special circumstances justifying their de-designation, namely the lack of alternative policy compliant sites.

4.20 Whilst the Council has previously undertaken a borough-wide review of Green Belt/MOL, this was in 2010 as part of the production of the Development (or Core) Strategy (adopted in April 2012). A wider, more strategic Green Belt/MOL review, particularly in the context of the need to meet objectively assessed needs in the wider metropolitan London area and beyond, is however one of a number of proposals that are likely to be considered as part of a fundamental review of the London Plan. This is however unlikely to reach any firm conclusions until the end of the decade.
4.21 This strategic Green Belt/MOL review process will therefore not meet the required timescales for delivery of school places on these sites to help meet the identified need. De-designation of all or part of the shortlisted sites which are currently designated as MOL is therefore achieved through this DPD. The relevant sites to which partial or full de-designation applies are:

- S-ACT2: Acton Park depot, The Vale, Acton
- S-HAN1: Eversheds Sports Ground, Hanwell
- S-EAL4: Former Barclays Sports Ground, Park View Road, Ealing

4.22 The extent of the de-designation sought within each of these sites is indicated on the individual site maps included at Appendix 1. This correlates with the extent of the School Site Allocation in the Policies map and is the maximum area considered necessary at each site to accommodate school buildings and associated facilities (including playing fields) in accordance with the potential forms of entry (FE) in Table 4.1. As detailed in paragraphs 6.1 - 6.3 (pg 20), further revisions may be sought and subsequently made to the boundary of the areas designated post adoption of this plan to further reduce the extent of MOL de-designated. As revised, the final boundary of individual sites will therefore reflect no more than the site area necessary to provide the required educational facilities for these sites and cause the least harm to the openness of the wider site.

4.23 Whilst the process of adopting a Planning for Schools DPD is intended to help identify suitable sites and establish the principal of school use on some sites, it should be noted that each extension or new school would still require a planning application and would be considered on its own merits in terms of design, transport and other impacts. To enable a full assessment of detailed proposals for expansion or new provision at any of the sites, a range of supporting documents would be required with the planning application submitted, including a full Transport Assessment and School Travel Plan, Road Safety Audit, PERS and CERS audits. The mitigation of potential impacts would appropriately be secured through details of the development, planning conditions and Legal Agreements.

4.24 As this DPD has progressed through the formal stages of plan making, towards adoption, the acceptability of the use in principle of the shortlisted sites for new or extensions to existing schools is given greater weight in the assessment of associated planning applications.

Free school provision

4.25 Simultaneously with the Council’s shortlisting of sites, funding for three Free Schools has been agreed by the Education Funding Agency (EFA), to be provided by Ealing Fields, Twyford Academies Trust and Ark to provide 4, 6.5 and 6 secondary FE respectively. Sites for these Free Schools have yet to be confirmed, although the DPD helps to facilitate this provision.
Policies

5.1 It is appropriate to have planning policies in place to help facilitate the provision of schools in the right places, and to protect identified sites for education use to meet the identified need. Adopted policies, supporting text and details of proposed monitoring and review are set out below:

5.2 PLANNING FOR SCHOOLS DPD POLICY 1: SAFEGUARDING OF ALLOCATED SITES FOR SCHOOL USE

The sites allocated for school use in Table 4.1 (Short list of sites) will be safeguarded for school use. Development for non-school uses will only be considered on land allocated in Table 4.1, if:

a) Other uses are already envisaged as part of a mixed proposal incorporating a school; or

b) It can be demonstrated that the site is surplus to requirements, and is no longer required for a school use.

If sites S-ACT2, S-HAN1, S-EAL4, and S-ACT7 are not developed for educational use, development for other uses would not be justified and would not be in conformity with the London Plan.

Policy 1 supporting text:

5.3 Current need in terms of number and location of school places is confirmed within the Demography, Projections and School Place Planning Methodology background document (January 2015) and the Demography Update (October 2015). Due to the many variables affecting need, need may change over time and as such the Council will be regularly monitoring and updating need data, which will be reported to the Council’s Cabinet annually in the appropriate Cabinet reports. Whilst this policy protects allocated sites for education use, it also therefore provides the opportunity to release allocated sites (or parts of allocated school sites) should it be agreed by the Council that they are no longer required. A DPD review may therefore be triggered within the plan period in addition to the opportunity for review referred to in para 5.11. The outcome of these reviews would be (in terms of 5.11) to extend the plan period beyond 2021 and (in terms of releasing parts of allocated sites) to refine the boundaries of the school site allocations to reflect no more than the finally approved built form.
5.4 PLANNING FOR SCHOOLS DPD POLICY 2: SCHOOL DEVELOPMENT PROPOSALS

School development proposals on existing school sites and sites listed in Table 4.1 (Short list of sites) will generally be supported, provided that the proposals comply with the Development Plan for the area.

Primary or Secondary school development on other sites may be permitted if the proposals comply with the other Schools DPD policies, Ealing’s adopted development plans and the Council’s other statutory duties in respect of school places, and:

(i) It can be demonstrated that there is a shortfall in the schools capacity to meet the current need; and

(ii) There is no adverse cumulative effect, when taken together with existing educational facilities, on the well-being of the local community, including any significant adverse impacts against the Schools DPD, on the local and heritage assets, and any other local plan sustainability objectives.

Policy 2 supporting text:

5.5 For planning applications for Primary or Secondary school use on sites other than those in Table 4.1, applicants will need to demonstrate to and satisfy the Council that the proposal meets an identified need in terms of size and location. Current need in terms of number and location of school places is confirmed within the Demography, Projections and School Place Planning Methodology background document (January 2015). Need may change over time and as such the Council will be monitoring and updating need data, which will be reported to the Council’s Cabinet annually in the appropriate Cabinet reports.

5.6 On allocated sites, school developments should seek to make efficient use of the land, and in the case of land formerly designated as open space, proposals should seek to minimise the extent of the footprint in order to mitigate impact on the openness of the wider site.
PLANNING FOR SCHOOLS DPD POLICY 3: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

- Specific policies in that Framework indicate that development should be restricted.

Monitoring and Review

5.8 The Planning for Schools DPD will be formally reviewed after five years following its adoption. It is recognised that the demographic data informing need comes from various sources, and is an ongoing process, with less certainty being able to be applied to more distant projections. Formal review will however ensure that the Plan is still meeting the borough’s projected needs in terms of amount and location of school place provision, taking into account the latest and best available demographic data.

5.9 The implementation and effectiveness of the Plan’s policies will be reported each year in the borough’s Authorities’ Monitoring Reports. Monitoring will involve the collation of data to check progress against the Plan’s objectives and implementation of the Plan’s policies. This will enable the Council to monitor delivery of school development on the sites identified in the Plan within the timescale required. The Council will then consider whether the allocation of sites is sufficient in relation to the need at that time and whether the Plan needs reviewing and updating.
5.10 Key performance indicators will include:

- Site allocations: Number of sites implemented to date / sites still available / sites lost to other uses / any additional sites
- Delivery: Type (Primary/secondary school) / Nature of provision (as permanent/temporary) / amount (FE) / location of provision / in time required

5.11 If as a result of the Council’s monitoring it is established that the Plan has not delivered school places in terms of the amount or location required (in accordance with up-to-date need figures), an earlier policy review may be necessary. A trigger for review would be if the Council is unable to meet its statutory duty to offer an appropriate school place to all children who require one. A policy review could potentially lead to policies being worded more tightly to ensure delivery to meet the borough’s identified need.

5.12 The Plan period is to 2021;

a) In order to justify the retention of sites which are currently designated as MOL, open space and playing fields (sites ref S-ACT2, S-HAN1, S-EAL4 and S-ACT7) beyond the Plan period a review of the Plan will be needed at the appropriate time to establish whether their de-designation is required beyond the Plan period.

b) Sites currently excluded from the Council’s shortlist (on grounds of deliverability in relation to current need/timescale or otherwise) may provide for an as yet unidentified need up to 2021 or beyond. As part of the Council’s monitoring and review process some sites from the long list may therefore subsequently need to be re-considered for allocation for school use.
Introduction to Appendix 1

6.1 The purple line boundary identifies sites to be allocated through this DPD for extended extensions to existing or new education use. Where these boundaries overlay other incompatible adopted policy designations (i.e. MOL, Public Open Space and/or Community Open Space), the plan has initially sought to remove these, and this will be reflected through changes to the adopted policies map. The purple line boundary represents the maximum area required to accommodate school buildings and associated facilities (including playing pitches if required) on each site.

6.2 The precise footprint of a new or extended building can only be established through the subsequent planning process, once detailed development proposals have been submitted, fully assessed and approved.

6.3 The floorspace for education use on all sites should be established with reference to up-to-date guidance (currently BB103 June 2014). Where sites cover areas formerly designated as MOL/playing fields, every effort should be made to minimise the extent of the built development to mitigate the harm caused to the openness of the wider site. As the area needed for built development is likely to be smaller than the main purple line boundary, the area excluded from the built footprint (once detailed proposals are approved) could subsequently revert back to MOL/POS/COS as appropriate. The Council will work with others including developers, landowners, Sport England and the EFA to minimise the extent of the built footprint and to determine the final boundary. The final boundaries will be amended through future reviews of the DPD, and pending such a review will be noted within the relevant Authorities Monitoring Report.
The prefix ‘S-‘ on site references on maps and text within this Planning for Schools DPD refers to ‘Schools’ (e.g. ‘S-EAL1’, ‘S-ACT3’) and has been used to distinguish the potential list of school sites from those sites with similar references (e.g. ‘EAL1’) in the Council’s Development Sites DPD. Site references have been carried over from sites originally identified in the Council’s long list of sites. Any additional sites since the Issues and Options stage have been given a subsequent number according to their location / area prefix (i.e. S-ACT7 and S-ACT8).
Site Area: 0.42 ha

Current Designations Include: Metropolitan Open Land, Public Open Space, Conservation Area

Current Use: Hard paved depot site with temporary buildings.

Other Information:

*Whilst the Planning for Schools DPD seeks to establish the principle of use on this site, any development on this site will require separate planning application and formal assessment.
Site Area: 0.16 ha

Current Designations Include: Community Open Space

Current Use: Pavilion associated with playing fields

Other Information:

*Whilst the Planning for Schools DPD seeks to establish the principle of use on this site, any development on this site will require separate planning application and formal assessment.
Site Area: 1.7 ha

Current Designations Include: Town Centre, Archaeological Interest Area

Current Use: Existing further education college

Other Information:

*Whilst the Planning for Schools DPD seeks to establish the principle of use on this site, any development on this site will require separate planning application and formal assessment. In addition further archaeological assessment would be required.
S-EAL4 - Former Barclays Sports Ground, Park View Road

Site Area: 1.5 ha

Current Designations Include: Metropolitan Open Land, Community Open Space

Current Use: Sports ground including disused sports facilities

Other Information:

*Whilst the Planning for Schools DPD seeks to establish the principle of use on this site, any development on this site will require separate planning application and formal assessment. In addition further archaeological assessment would be required.*
Site Area: 1 ha

Current Designations Include: Archaeological Interest Area, Grade II Listed Building

Current Use: Vacant, formerly used education facilities

Other Information:

*Whilst the Planning for Schools DPD seeks to establish the principle of use on this site, any development on this site will require separate planning application and formal assessment. In addition further archaeological assessment would be required.
S-GNP2 - Land adjacent to Greenford High School, Ruislip Road, Greenford

Site Area: 0.36 ha

Current Designations Include: N/A

Current Use: Unused open space adjacent to high school

Other Information:

*Whilst the Planning for Schools DPD seeks to establish the principle of use on this site, any development on this site will require separate planning application and formal assessment.
Site Area: 0.26 ha

Current Designations Include: Metropolitan Open Land, Archaeological Interest Area, Community Open Space

Current Use: Sports Ground and pavilion (currently occupied by education use benefitting from temporary planning permission)

Other Information:

*Whilst the Planning for Schools DPD seeks to establish the principle of use on this site, any development on this site will require separate planning application and formal assessment. In addition further archaeological assessment would be required.*
S-HAN4 - 42 Lower Boston Road, Hanwell

Site Area: 0.09 ha

Current Designations Include: Conservation Area

Current Use: Vacant land

Other Information:

*Whilst the Planning for Schools DPD seeks to establish the principle of use on this site, any development on this site will require separate planning application and formal assessment.
Links are provided below to other documents referred to in this report:

Ealing Council Demography, Projections and School Place Planning Methodology (Jan 2015)

Planning For Schools DPD Phase 2 Evidence Note - Municipal Projects (Feb 2015)

Planning for Schools DPD Viability Assessment - BNP Paribas Real Estate (Feb 2015)


Planning for Schools DPD Issues and Options Representation report

Ealing Council Cabinet report: Planning for Schools DPD Progress and update (21 Oct 2014) (See item 12)
http://ealing.cmis.uk.com/ealing/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/774/Committee/3/Default.aspx

Ealing Council Cabinet Minutes - Planning for Schools DPD Progress and update (21 Oct 2014)
http://ealing.cmis.uk.com/ealing/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/774/Committee/3/Default.aspx (scroll down to minutes)

Ealing Council Cabinet report: Update on School Expansion Programme and Projected Future Demand (Apr 2014) See item 09:

http://ealing.cmis.uk.com/ealing/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/261/Committee/3/Default.aspx
The Department of Education Building Bulletin (BB) 103: ‘Area guidelines for mainstream schools’ (June 2014)


‘Notes on area guidelines for mainstream schools’ (March 2015)


Historic School Buildings (Web Based Resource)

https://www.historicengland.org.uk/advice/planning/local-heritage/historic-school-buildings/

Practical considerations for the design and implementation of refurbishment projects of historic school buildings


Successful school refurbishment case studies


Ealing Council Planning for Schools DPD Issues and Options consultation (Oct 2013)

http://www.ealing.gov.uk/downloads/download/2707/planning_for_schools_dpd


http://www.ealing.gov.uk/downloads/download/2708/planning_for_schools_dpd_supporting_and_background_documents


http://www.ealing.gov.uk/downloads/download/2708/planning_for_schools_dpd_supporting_and_background_documents

Planning for Schools DPD Evidence Note - Municipal Projects (Oct 2013)

http://www.ealing.gov.uk/downloads/download/2708/planning_for_schools_dpd_supporting_and_background_documents
Ealing Council Secondary School Site Search - GVA (June 2013)
http://www.ealing.gov.uk/downloads/download/2708/planning_for_schools_dpd_supporting_and_background_documents

EC Harris Primary School Site Search (2010)
http://www.ealing.gov.uk/downloads/download/2708/planning_for_schools_dpd_supporting_and_background_documents

Ealing Council Development / Core Strategy DPD
http://www.ealing.gov.uk/downloads/download/1322/adoption_of_the_development_or_core_strategy

Ealing Council Infrastructure Delivery Plan (Sep 2010)

Ealing Council Infrastructure Delivery Schedule (July 2011)

Updated - Demography, Projections and School Place Planning Methodology Report
For further copies of this document please contact:
Planning Policy
Ealing Council
Perceval House
14/16 Uxbridge Road
London W5 2HL
Tel: 020 8825 5882
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