

PLANNING FOR SCHOOL DPD – ISSUES AND OPTIONS CONSULTATION (OCTOBER-DECEMBER 2013) REPRESENTATIONS SUMMARY

In response to the above consultation, 29 respondents made 40 representations. The respondents comprised:

- 8 Schools
- 7 Community Groups
- 5 Statutory consultees
- 5 Local residents
- 4 Site owners

Representations were made to the questions as outlined below. [*The Council's response or comments where required are included in square brackets and italics*]:

Q1 – Are there any other issues that should be taken into account when identifying the need for school places in the borough:

Soundness

- Soundness challenged – demographic data and analysis not published [*A background demography paper was published alongside the 2013 Issues and Options consultation*]

Evidence

- More detail required on what and where demand is - including map overlay. Provision should be made in areas of greatest need. [*Detail on demand is provided in Tables 5 (primary) and 6 (secondary) of Demography paper (2013) published as background to Issues and Options consultation document. The published data was the most recent available at the time of publication. A demography update has been provided with the current consultation on the Publication Version and short-list of sites to ensure decisions made on sites are informed by the current/latest known position on demand. Mapping of demand is not currently provided*]
- More detail required on site size required for required forms of entry [*The Department of Education Building Bulletin 33 sets out non-statutory area guidelines for school buildings and sites and this guidance has been used for reference in the site selection process.*]
- No discussion on the issue of commuting out of borough to schools and impact that transport improvements (e.g. Crossrail) may have on this. [*Out of borough commuting is*

estimated on past trends; any impact of transport improvements will only be able to be monitored once such improvements are in place]

Traffic

Increase in existing traffic and safety problems at existing schools *[Transport and safety matters would be taken into consideration as part of the assessment of any planning application]*

Proximity to existing and planned public transport routes

Would help to reduce car use to drop pupils *[Agreed. Public Transport Accessibility was one of the shortlisting criteria].*

Admission policies/ entry criteria of existing schools

Removing entry criteria (e.g. gender and faith) would enable pupils to attend their nearest school. There would be more places available in Acton/Ealing. *[School admissions criteria is outside the scope of this DPD]*

Land designation

Oppose use of MOL or other green space. New schools or extensions should be built on brownfield sites. London Plan (Policy 4.4i) provides flexibility to consider education use on industrial sites . *[Whilst it is the Council's preference to use policy compliant sites, as some policy sites have been excluded at shortlisting stage based on deliverability or other grounds, the Council has no choice but to propose building school extensions or new schools on some sites currently designated for other uses. The justifications for site shortlisting are set out in the spreadsheet appended to the Stage 2 Municipal Projects report, published separately as a background document.]*

Site size

Should identify sites which have space to expand further in the future. *[Sites have been identified to meet current identified need. Regular monitoring will be undertaken of the delivery of sites to meet the need. If need is not being met a review of the policies and/or Plan will be required]*

Reference to specific sites :

- Request S-SOU1 be deleted *[not shortlisted]*
- Potential for S-ACT6 to re-open as a place of worship *[Noted.]*
- S-HAN4 potential to implement permission for a medical centre or for residential development – to allocate solely for school use would prejudice alternative uses. *[School use considered appropriate to enable provision of bulge class for adjacent primary school]*
- Site in Hillingdon (part of GVA wider site search) is in fact green belt and should not be considered further *[Noted – not taken forward]*
- Expand East Acton primary to permanent 2FE incorporating some land from the Park Club adjacent rather than bulge class.

Sustainability Appraisal

Inclusion of S-ACT2 Acton Park depot in long list contravenes Local Plan as is designated MOL/POS [Whilst it is the Council's preference to use policy compliant sites, as some policy sites have been excluded at shortlisting stage based on deliverability or other grounds, the Council has no choice but to propose building school extensions or new schools on some sites currently designated for other uses. The justifications for site shortlisting are set out in the spreadsheet appended to the Stage 2 Municipal Projects report, published separately as a background document to the Planning for Schools DPD Publication Version – February 2015.]

Q2 Of the three possible options suggested for accommodating the identified need for school places in the borough, which option do you favour and why?

Number supporting each option in brackets (X):

Option 1 Do nothing (0) – is not feasible

Option 2 Expand existing premises (5) – preferable, most cost effective

Option 3 Identify new sites (8):

- Enables Council to meet demand in new buildings fit for purpose
- Provides opportunity for existing schools to relax entry requirements
- Opportunity for split-site schools
- Would cause least disruption to existing schools
- Would minimise risk of reducing standards by expanding existing schools
- Should only be explored once all option 2 sites implemented

[All responses noted]

Q3 Which of the identified sites for new school places in the borough are appropriate? Why?

No. of respondents in brackets (X)

- View that preference should be given to sites in education or other social infrastructure uses

- S-ACT 3 Eastman Rd Ind Estate (2)– large site with large residential catchment, well served by public transport, loss of industrial land could be justified by vacancy and strong local demand for places
- S-ACT4 Twyford Abbey (1) – Potential for a secondary school adjacent to an existing primary. Would result in no loss of employment which would occur if industrial sites were used.
- S-ACT5 Park Royal (2)– Large site with opportunity for school as part of a mixed use development
- S-ACT6 St Albans Church Acton (3) –vacant, highly accessible, within area of need, proposal to establish a Free School on the site is advanced
- S-EAL1 Uxbridge Road (2)- Central location, high PTAL, deliverable, close to open space
- S-EAL2 Uxbridge Road (2)- Central location, high PTAL, deliverable, close to open space
- S-EAL3 Craven House, Bilton House and land to r/o Cavalier House (1)
- S-EAL4 Barclays Sports Ground (6)- Large site , school could be developed on existing built area, Sports facilities could be shared by community outside school hours, high demand in this area, could accommodate a primary and secondary, near public transport interchange.
- S-EAL5 Gordon Road (4) Of interest to Christ the Saviour C of E Primary, appropriate size and accessibility for a state primary, near public transport interchange, in area of need for primary
- S-EAL6 King Fahad Academy (4) – already in education use, currently vacant and close to open space, proximity to public transport
- S-EAL7 – Lamertons (2)- Highly accessible and good access to open space and in area of need
- S-EAL8 Orion Park, Northfield Avenue – (1) proximity to public transport
- S-HAN1 Eversheds (1) if as a split site option for an existing local primary
- S-HAN2 Trumpers Way (1) if as a split site option for an existing local primary, would be preferable to the existing use in terms of amenity of surrounding occupiers
- S-HAN3 Wickes (1) if as a split site option for an existing local primary
- S-HAN4 42 Lower Boston Rd (2) if as a split site option for an existing local primary, should be used for adjacent existing primary school
- S-GNP2 Land in front of Greenford High School (1) should be retained until required for education use
- S-GNP3 Educ centre, Mansell Rd (1) In existing education use
- S-SOU1 Southall East (1) part of site (Middx Business centre) would be appropriate, consistent with draft Southall OAPF
- S-SOU2 Park Ave(1), whilst not mentioned in draft Southall OAPF, accords with aspirations for the area
- S-SOU3 Southall West (1) Outline PP for primary exists, also appropriate for secondary school, consistent with draft Southall OAPF

[The justifications for shortlisting and/or excluding sites are set out in the spreadsheet appended to the Stage 2 Municipal Projects report, published separately as a background document to the Planning for Schools DPD Publication Version – February 2015.]

Q4 Which of the identified sites for new school places in the borough are not appropriate? Why?

No. of respondents in brackets (X)

- S-ACT1 Horn Lane (1) -noisy and polluted site with low PTaL, too small
- S-ACT2 Acton Park Depot (3) -poor access, adjacent to busy road, site shape difficult to use, any released land should be used for a district park
- S-ACT3 Eastman Rd Acton(2) -Would reduce employment opportunities on the site, should be retained for industrial
- S-ACT4 Twyford Abbey (3) -Grade 2 listed unsuitable, contrary to policy/ MOL designation, Inappropriate for a primary because the adjacent West Twyford Primary is expanding by 2FE and will provide for local need, risk of over provision, would exacerbate existing parking and congestion problems, in addition inappropriate for a High School because of potential social issues of students mixing with primary, inadequate public transport capacity.
- S-ACT5 Park Royal, S Gateway, Acton (2)- Would reduce employment opportunities on the site, any land released should be open space use
- A-ACT6 St Albans Church S Parade (1) –likely to be housing or retained as a church
- S-EAL1 49-69 Uxbridge Road (1) – loss of employment floorspace would impact on viability of Ealing Met centre
- S-EAL2 99-113 Uxbridge Rd (1) – Offices under construction [part], loss of employment floorspace would impact on viability of Ealing Met centre
- S-EAL3 Craven House (1) - loss of employment floorspace would impact on viability of Ealing Met centre
- S-EAL4 Former Barclays Sport ground (1) – would conflict with London Plan policies for protection of MOL, school use would generate noise and congestion, has low PTaL
- S-EAL5 Gordon Road (1)- Different ownerships of the site, sizes of parts of the site and phasing requirements make deliverability an issue, contrary to Objective 2 of the DPD (requiring safe, convenient and accessible location) and objective 3 (requiring good space standards), not easy route or close to playing fields, other sites identified are more suitable and deliverable
- S-EAL 6 King Fahad (1) - would create an overconcentration of primary school places in one road
- S-EAL7 Lamertons (2) – small, adjacent to busy road, would represent loss of local town centre uses
- S-EAL 8 (Orion Park) (3) - too small, inappropriate shape, issues with proximity to industrial area and railway line, no play space, close to existing provision
- S-EAL9 PH Car park (2) – issue of railway noise, relocation of sub-station required, needed for Council parking
- S-GBP1 Pheonix Trading Estate Perivale (2) – would displace an existing business, close to borough boundary as such would not serve only Ealing catchment

- S-HAN1 Eversheds (2) Site too small, close to existing provision, in MOL, should be used for recreation
- S-HAN2 Trumpers Way (1) too small, poor access, close to busy road, no potential for play space
- S-HAN3 Wickes (2) –poor access and close to existing provision, should be retained as retail
- S-HAN4 42 Lower Boston Rd (1)- too small/other options for use of the site have not been explored
- S-SOU1 Southall East (1) Locally listed buildings less suitable , only Middlesex business centre appropriate
- Land at Springfield Road, LB Hillingdon (1) - Site identified in GVA site search but is in Greenbelt and near a gas pipeline [*Agreed – was not in final LBE long-list*]
- Any sites close to major road and rail lines

[The justifications for short listing and/or excluding sites are set out in the spreadsheet appended to the Stage 2 Municipal Projects report, published separately as a background document to the Planning for Schools DPD Publication Version – February 2015.]

Q5 Response to Call for sites / New sites suggested:

11 new sites were suggested and 3 suggestions were made for extensions to sites already included in the Council's long list:

New sites:

- 58, 60, 62 Hanger Lane and 81, 83, 85 Madeley Road
- The Studios in Cambridge Road, Hanwell (known as Marall Smith Film & Video Productions)
- Former Barclays Sports Ground, Park View Rd [*was already in Council's long list*]
- 27 The Vale
- 2 Bollo Lane, Chiswick
- Shepherds Bush Cricket Ground
- Land r/o Twyford School
- Allotments Northfield Avenue east side
- Warren Farm Southall
- The Park Club, East Acton Lane
- Acton Job Centre

Extensions to long listed sites:

- S-GNP2 Land in front of Greenford High School - potential to include 309 Ruislip Rd and petrol station to the west of 309?
- S-HAN3 Wickes - site could be extended to include sales/garage to south-east?
- S-HAN2 Trumpers Way - include industrial premises to South West

[The justifications for including/shortlisting and/or excluding sites are set out in the spreadsheet appended to the Stage 2 Municipal Projects report, published separately as a background document to the Planning for Schools DPD Publication Version – February 2015.]

Q6 Any comments or suggestions on how the LPA should produce a short-list of sites for new school places in the borough?

- Deliverability
- Site size
- Proximity to playing fields
- Public transport accessibility
- Proximity to areas of greatest need
- Long-term viability – need to provide for long term demand rather than short-term need which may not be sustained
- Prioritise high school sites near to primary schools which have no obvious local state comprehensive to feed into
- Walking distance from areas of greatest demand
- Safety of students moving to and from the site
- Request to meet with interested parties to discuss

[Some already included as long or short listing criteria; others noted]

Other comments:

- Would welcome discussions with local schools re: split School sites (Oaklands) and expansion (East Acton Primary) *[Noted but no action taken at this stage. The Schools Service undertake will consultation with stakeholders if and when any expansion proposals are planned at a particular site]*
- Absence of consultation with landowners (42 Lower Boston Rd) *[The site owner was consulted by letter and email in Oct 2013]*
- Should have approached individual occupiers of wider sites (Vanguard) *[Best endeavours were used to establish site ownership of all affected sites on the long list and extensive consultation was undertaken with site owners and stakeholders. This particular site has not been taken forward in any case]*