



**PART B - Your representation.**

**Please use a separate sheet for each representation**

Name or Organisation:

**Q1. Which document are you making a representation on?**

- Local Plan Part 2 Schedule of Proposed Main Modifications
- Further Addendum to the Sustainability Appraisal

**Q2. To which Main Modification does this representation relate?**

MM25

MM26

**Please specify which part of the Main Modification you are referring to: Policy Wording, Paragraph, Table or Figure / Map you are referring to:**

Policy DMCI 2 New Community Infrastructure

Policy DMCI IA: Development of New Education Floorspace

**Q3. Do you consider the Main Modifications are:**

**Legally Compliant?**

- Yes  No

**Sound?**

- Yes  Yes, with minor changes  No

**Q4. If you consider the Main Modifications are unsound, is it because they are not:**

- Positively Prepared?
- Justified?
- Effective?
- Consistent with National Policy?

**Q5. Please give details of why you consider the Main Modifications are not legally compliant or are unsound. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Main Modifications, please also use this box to set out your representation.**

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested changes.*

Iceni Projects Ltd is instructed by Diocese of London to make representations to The London Borough of Hillingdon ('the Council') in response to the Proposed Main Modifications to the Local Plan Part 2 Consultation.

These representations relate to the Diocese of London's landholdings at Land at St Martins, Breakspear Road, Ruislip which we consider is suitable for meeting educational needs in Hillingdon. We consider the site could accommodate a new primary, secondary or SEN school. Given its size and location it also has the potential to provide significant areas of playing fields for the school. This could be opened up for use by the local community providing further benefits.

The purpose of this letter is to provide comment on the Main Modifications of the Local Plan as set out within the Proposed Schedule Document, specifically in relation to Chapter 7: Community Infrastructure, which proposes to amend Policy DMCI 2: New Community Infrastructure and incorporates New Policy DMCI 1A: Development of New Education Floorspace.

### **Policy DMCI 2 New Community Infrastructure**

The Council's up to date assessment to reflect the current position of educational needs over the period of the Local Plan is welcomed. The Strategic Infrastructure Plan (SIP) acknowledges that the Council have a statutory duty to make suitable provision to meet the needs of children and young people with special educational needs. Notwithstanding this, there is no reference to the level of need for Special Educational Needs (SEN) schools in the borough. We understand that the level of demand already

outstrips supply in the Borough, with a shortage of places. While it is acknowledged that quantifying this level of need is harder than for mainstream pupils, this does not simply mean it should be ignored.

The level of need for SEN schools should be established so a sufficient supply of sites can be identified to meet this need. Identifying school sites within outer London Boroughs is difficult and the absence of policy coverage for SEN schools means that there could be significant issues with meeting the needs of these pupils.

As it currently stands this policy is currently unsound as it is not 'positively prepared' to meet all potential educational needs of the Borough.

### **Policy DMCI IA: Development of New Education Floorspace**

Policy DMCI IA: Development of New Education Floorspace proposes a criteria in which the Council will use to determine proposals for new schools and school expansions. This approach is acceptable in principle; however, we consider some areas of the criteria to be restricting when assessing which sites should be brought forward to address education needs.

Part (i) of the policy states that proposals will be assessed based on the size of the site, its location and suitability to accommodate a new school or school expansion taking account of compatibility with surrounding uses and existing planning policy designations. While we agree that proposals should be assessed against existing planning policy designations, reference to specific designations such as Conservation Areas, MOL and Green Belt should be removed as they are superfluous. Schools are often more desirable on Green Belt sites as it allows a more pleasant environment for the school (with playing fields, for example) and can help with the delivery of higher quality infrastructure in sustainable locations.

Further to this, assessing proposals based on the location and accessibility in relation to the intended catchment area of the school acts has the ability to rule out more sustainable and better suited sites outside of this area. The catchment area for a school can vary significant over the early years of operation and using this as a policy constraint is considered to be unnecessarily flexible to the site finding process. In any case, we consider that the school is best placed to establish the best location in relation to the catchment area.

We also consider that there is no guidance about how this policy will be operated in practice and thus the policy is too imprecise to be helpful within the decision-making process.

The proposed policy is considered to be unsound on the basis that it is not positively prepared (will not assist in meeting the educational needs of the Borough) and is not justified (the policy wording is not supported by evidence and imprecise).

**Q6. Please set out what change(s) you consider necessary to make the Main Modifications (and so the Plan) legally compliant or sound, having regard to**

the test you have identified at Q4 above where this relates to soundness. You will need to say why this change will make the Main Modifications (and so the Plan) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:

**New Policy DMCI 1A: Development of New Education Floorspace**

*New policy to assess proposals for new schools and school expansions:*

Policy DMCI 1A: Development of New Education Floorspace

Proposals for new schools and school expansions will be assessed against the following criteria:

- ~~i. The size of the site, its location and suitability to accommodate a new school or school expansion taking account of compatibility with surrounding uses, and existing planning policy designations (e.g. conservation areas, MOL, Green Belt).~~
- i. The impact on green open space, games pitches, outdoor play and amenity space, taking account of the character of the area, whether the site is within an area of open space deficiency and whether the school has sufficient outdoor space for play and games.**
- ii. The location and accessibility of the site in relation to:
  - ~~• the intended catchment area of the school;~~
  - public transport; and
  - the local highway network and its ability to accommodate new or additional school trips without adverse impact on highway safety and convenient walking and cycling routes to schools.
- iii. The extent to which the building design contributes towards the government target that schools and colleges should be zero carbon from 2016.

**Q7. If your representation is seeking a change, do you consider it necessary to participate at any further oral part of the examination? N.B. it is expected that Main Modifications will be addressed through written representations.**

No, I do not wish to participate at any further oral part of the examination

Yes, I wish to participate at any further oral part of the examination

**Q8. If you wish to participate, please outline why you consider this to be necessary.**

**Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the**

**examination. The Inspector may consider that it is not necessary to reopen the hearings and has already indicated that he is unlikely to do so.**

Name:

Jamie Sullivan

Date:

07.05.2019

**Would you like to be updated of future stages of the Plan process?**

Please indicate which stage(s) of the Plan that you would like to be informed of:

- The publication of the recommendations of the person appointed to carry out the independent examination of the Plan
- The adoption of the Local Plan Part 2

***Please note that copies of representations will be made available on request for inspection at the councils' offices and cannot be treated as confidential, however personal addresses and signatures will be removed from public copies.***

## **Submitting your representation**

Please return this form:

By email: [localplan@hillingdon.gov.uk](mailto:localplan@hillingdon.gov.uk)

By post: Planning Policy Team, 3N/02, Residents Services, Civic Centre, High Street, Uxbridge, UB8 1UW.

All forms must be submitted by **5:00 pm** on  
**Wednesday 8 May 2019.**

Thank you for taking the time to complete and return this representation form.  
Please keep a copy for future reference.