

References: 62/01/NA/S and 62/02/NA/S

## **Executive Summary**

This is an update to previous representation made in 2015 regarding the Glebe Land. This must be read in conjunction with the previous representation. We wish to bring to attention of the Planning Inspectorate team the following points regarding LB Hillingdon's revised Local Plan (Part 2):

Wrong identification of the site; erroneous designation; review to ascertain exact merits of its Green Belt designation

1. LB Hillingdon have erroneously identified the site in their diagrams. The Glebe land site is a self-contained plot with no current education facilities sited on it or attached to it. The attached plan indicates the extent of the Glebe Land site;
2. It has been brought to LB Hillingdon's attention that there is inconsistency in designation and assessment of the site but they continue to incorrectly identify the exact site. Their assessment is hence inadmissible and should be ruled as such (we would respectfully request an independent assessment)
3. In the initial representation, substantial argument was made as to why the site did not merit its Green Belt status i.e. addressing the 'five point' challenge. LB Hillingdon are inconsistent in their assessment against these five points, separately identifying one or two rationale as to its designation. This indicates an unco-ordinated and inconsistent assessment and substantiates another reason for the current assessment to be independently reviewed.
4. LB Hillingdon has applied a specific approach of rectifying Green Belt boundary irregularities or abnormalities from previous Local Plans where such events have occurred. We welcome this approach and request that the merits of revising the Green Belt boundary in relation to this site be independently reviewed so that natural boundaries that reflect the intent and amenity of the Green Belt are enforced.

### **Scope of review of the site**

The thrust of the above is to release a local community asset (only neighbours walk their dogs here) from the restrictions of its Green Belt designation and allow this valuable community asset to serve the whole LB Hillingdon community. The intent is to release the land to DMA and DoW to re-site the DMA school. A school that in successive OfSTED reports has been rated outstanding save its facilities which are now rated the worst in LB Hillingdon. DMA also is a split site school hence incurring substantial education, safeguarding, pastoral and financial challenges that moving to the Glebe Land would resolve.

It is acknowledged that any assessment by the Planning Inspectorate must be purely on material planning matters in relation to how LB Hillingdon has conducted its duties as the Planning Authority for the Borough, so while we emphasise the purpose and intent we know we must highlight the following:

1. A constituent, if not, fundamental, part of LB Hillingdon duties as Planning Authority is to consult with stakeholders regarding policies or sites. LB Hillingdon has at no stage engaged with, or sought comment from, DMA, DoWAT, DoW, GIL or the ESFA regarding this site. They have engaged with a land agent employed by LocatED (an agency of the ESFA) regarding the merits of a separate proposal regarding establishment of a Free School on this site, but not with the

public bodies, local education providers or freeholder as indicated. They can hence not demonstrate adequate consultation on the merits of proposals for the site as they are neither conversant with the details or the widespread, demonstrable support for such proposals.

2. Even if we set aside LB Hillingdon's inability to:
  - a. correctly identify the site;
  - b. consistently appraise its potential contribution to the communities of the borough it must serve;
  - c. fairly evaluate this sites' status utilising the same criteria as other sites (where they have redetermined Green Belt boundaries); holistically LB Hillingdon is failing to strategically plan its educational provision.

### **Education provision across LB Hillingdon**

1. LB Hillingdon's latest submission has increased its potential capacity for Housing provision by almost a factor of two. It can logically be assumed this has been done in light of the, much publicised, need for increased housing provision mandated by the GLA and SoS. Sufficient provision of Housing will be a major review point for the Planning Inspectorate. What accompanies a significant increase in such Housing provision is the accompanying need for community infrastructure. LB Hillingdon cannot evidence that it has comprehensively assessed this need in terms of education facilities.
2. LB Hillingdon, at an officer (education team, town planning) and political level, has failed to seek or to consider the school provision at DMA for the past 3 years and has never requested any pupil numbers in compiling the basis for its pupil planning projections.
3. We note the NPPF wording that states:

*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.*

*Paragraph 72, National Planning Policy Framework, DCLG, March 2012*

In the first instance, the parties promoting this representation would welcome LB Hillingdon in fulfilling its duty and meeting with the school and Glebe Land site promoters to discuss the challenges the school faces and collaboratively determine if a masterplan for the sites can reflect the need and priorities of the wider community not just a select, vocal few. However, the promoters are sceptical of LB Hillingdon's political desire (note that the Ward in which the site and DMA sit, is the Ward of the Leader Cllr Puddifoot and Deputy Leader Cllr Simmonds, who have actively frustrated officers from engaging) to tackle the challenges at DMA or in pupil place planning more strategically, we hence call for the Planning Inspectorate to recommend an independent assessment of the merits of this site and how it might resolve the challenges facing DMA.

The most compelling evidence we can provide of the limited data upon which LB Hillingdon is basing its projections, assumptions and hence the supposed forward looking Local Plan is to provide the DMA current and forecast roll numbers. These numbers direct from the school have not been requested for review or been incorporated by LB Hillingdon (beyond their own assumptions based on current 2017 PAN and roll number). The DMA numbers have assumed a very conservative retention in Year 12, to have a degree of certainty over total pupil numbers, in reality this number is higher and is forecast to continue to increase more markedly. In addition, current Year 7 is 262 with a waiting list of over 30 and the numbers for Year 7 in September 2018 are the same. It is reasonable to take 262 as the base number for Year 7 entry from this point. As you

can see from present to 2023-2024 this is projected to be a net increase of 250 students. The projections are based on the reasonable assumption of about 700+ applications for places and after all offers are made in March each year a waiting list of about 35+.

DMA is a school that serves the whole community of Hillingdon, not just the immediate ward of Ickenham, with close to 99% of DMA students resident in LB Hillingdon. A small number travel from Ealing, Brent, Hounslow, Harrow & Buckinghamshire. Note that there is a considerable overflow of Hillingdon students to schools in other authorities that LB Hillingdon have not modelled (should this ratio)

**Pupil Numbers – Current Total roll – May 2018 – 1320**

**Projections**

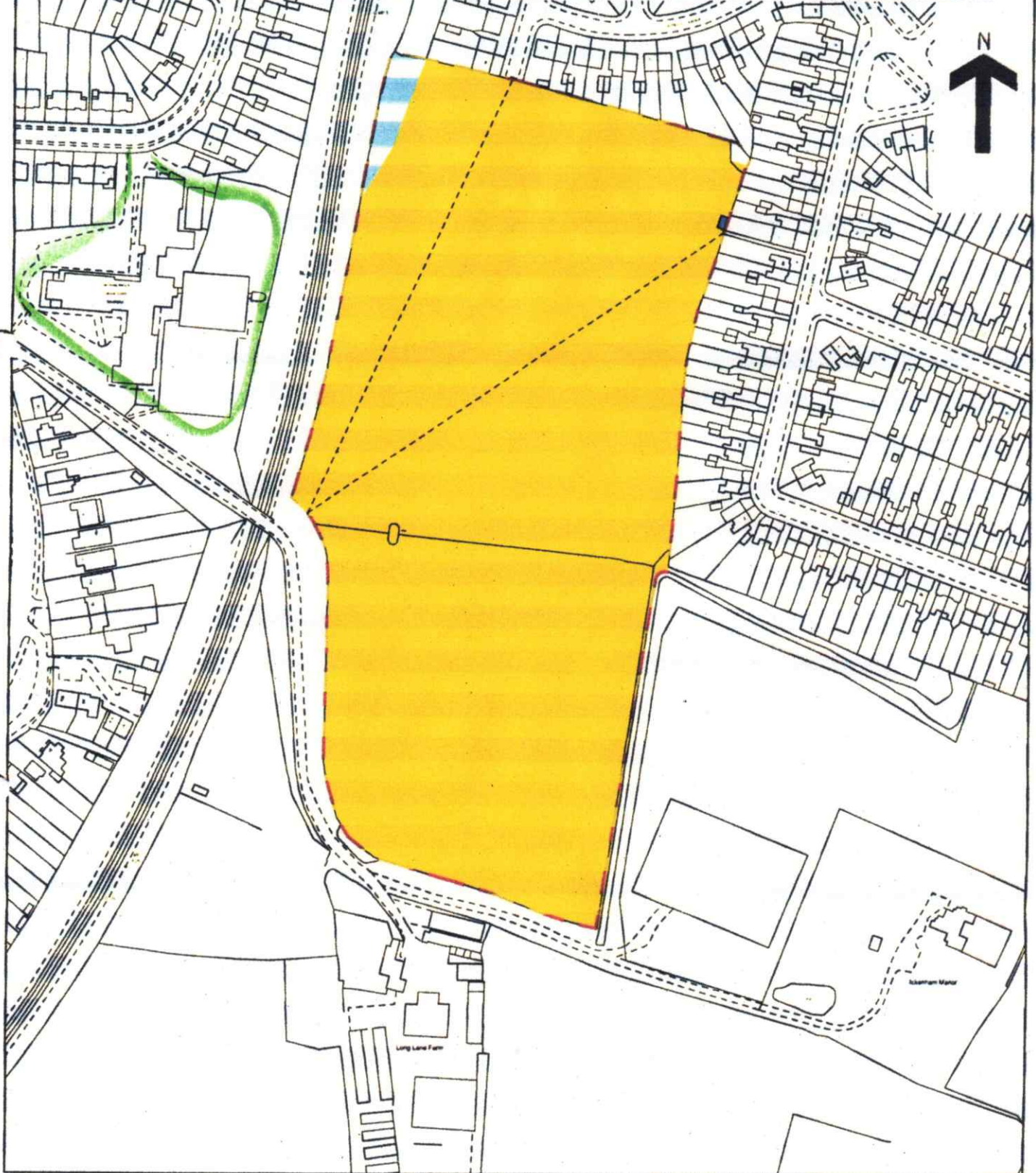
<b>School Year 2018 – 2019 - Total 1378</b>						
Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13
266	262	232	222	216	100	85
<b>School Year 2019 – 2020 – Total 1456</b>						
Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13
262	262	262	232	222	110	100
<b>School Year 2020 – 2021 – Total 1505</b>						
Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13
262	262	262	262	232	115	110
<b>School Year 2021 – 2022 – Total 1545</b>						
Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13
262	262	262	262	262	120	115
<b>School Year – 2022 – 2023 – Total 1560</b>						
Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13
262	262	262	262	262	130	120
<b>School Year – 2023 – 2024 – Total 1570</b>						
Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13
262	262	262	262	262	130	130

# and Registry Index map plan

Ordnance Survey map reference TQ0885NW  
Scale 1:2500  
Plan prepared on 30/06/2010 at 00:00:01



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This plan should be read in conjunction with result U79TMJB.

This plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. See Land Registry Public Guide 19 - Title Plans and Boundaries.