

A DONE DEAL:

how new schools are being
built on protected Green Belt
and Metropolitan Open Land
in Greater London

December 2015



FOREWORD

We need new schools and we need housing. In the right places.
Not on the Green Belt and not on Metropolitan Open Land (MOL).

Green Belts are afforded the highest level of protection from new development under the Government's National Planning Policy Framework. A similar level of protection extends to MOL. Politicians at all levels profess strong support for these provisions.

But this report highlights a considerable number of cases in Greater London where schools have been built or are being planned on Green Belt and MOL contrary to government policy and clear government guidelines.

How is this happening?

First, as the cases set out in this report show, the Government's Education Funding Agency is involved with identifying and acquiring Green Belt and MOL sites which are not identified in the local plan.

When public authorities are involved with the acquisition of land on a speculative basis in this way, it is highly prejudicial to the development plan process and it is not transparent as there has been no public consultation. It also undermines the proper investigation of alternative sites. Most concerning, it puts the planning authority under pressure to consent to the development.

At best this approach undermines confidence in the planning system. At worst it constitutes a manipulation of it.

This isn't the way we should be planning our towns, even according to the Government itself – which supports 'plan-led' development.

It is hypocritical to profess support for land protections on the one hand while on the other hand seeking to build on it.

Second, of course it is vital that we provide much-needed school places, but generalised pressures like the need for schools or housing do not constitute the 'exceptional circumstances' which must exist for Green Belt or MOL to be built on according to the government's planning guidelines.

In point of fact, land protections were put in place precisely to resist generalised pressures such as these, which have historically led to sprawl into green pastures. The provisions exist to push development instead into areas needing regeneration.

At times when cities grow, as London grows – this is when land protection policies are needed most. This is when these provisions must be strengthened, not weakened or abandoned.

- **We want politicians at all levels to stop just saying they support the continued protection of Green Belt and Metropolitan Open Land, and actually stop allowing or pushing for development on these protected green spaces. Instead support high quality, high density housing that meets local needs; use brownfield land first, not greenfield; regenerate run down areas; provide funding for restoration of contaminated land.**
- **We want Government and the London Mayor to recognise that the liberalised planning system is allowing important policy provisions to be ignored, and to therefore strengthen it. We want Government to be more specific on the limited circumstances in which Green Belt or Metropolitan Open Land boundaries can be changed through local plans or planning applications.**

Politicians at all levels should take heed of the growing number of people infuriated with having to fight to save land they thought was lawfully protected.

Green Belt and Metropolitan Open Land mean a lot, to a lot of people.



John Croxson
Chair, CPRE London

*“Since about 1940, the population of Los Angeles has grown at about the same rate as the population of London. **Los Angeles is now so enormous that if you somehow managed to pick it up and plonk it down on England, it would extend from Brighton on the south coast to Cambridge in the north-east.** That’s what happens if you don’t have a green belt.”¹*

Andrew Motion, President, CPRE



GREEN BELT, METROPOLITAN OPEN LAND AND URBAN OPEN SPACE IN LONDON

Most of London's Green Belt is outside of Greater London but there are large areas within the Greater London boundary and there is also a large amount of land designated as Metropolitan Open Land. Both are afforded the highest level of protection from development.

Protections were originally put in place to avoid urban sprawl and push development into areas which need regeneration. Metropolitan Open Land also exists to provide much needed green space within the city and includes a large number of important green spaces just a few examples of which are Blackheath, Burgess Park and Wimbledon Common.

Had the original Green Belt and MOL provisions had not been put in place, large areas in and around London like the Lee and Colne Valleys would now be urban sprawl.

The protection provisions are set out in the National Planning Policy Framework for Green Belts and in the London Plan for Metropolitan Open Land, as follows:

Extract from the National Planning Policy Framework²

9. Protecting Green Belt land 79.

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

80. Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;

- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

81. 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; to retain and enhance

landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

83. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should

only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Extract from the London Plan³

Improving London's open environment

3D.10 Metropolitan Open Land

The Mayor will and boroughs should maintain the protection of Metropolitan Open Land (MOL) from inappropriate development. Any alterations to the boundary of MOL should be undertaken by boroughs through the DPD process, in consultation with the Mayor and adjoining authorities. Land designated as MOL should satisfy one or more of the following criteria:

- land that contributes to the physical structure of London by being clearly distinguishable from the built-up area
- land that includes open air facilities, especially for leisure, recreation, sport,

arts and cultural activities and tourism which serve the whole or significant parts of London

- land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level
- land that forms part of a Green Chain and meets one of the above criteria.

Policies should include a presumption against inappropriate development of MOL and give the same level of protection as the green belt. Essential facilities for appropriate uses will only be acceptable where they do not have an adverse impact on the openness of MOL.

Urban Open Space and local designations

Many green sites are also designated as Urban Open Space, or similar local designations reflecting nature conservation importance. This affords a lower level of protection to green space. It is a local designation, reflecting that the site is of local importance.



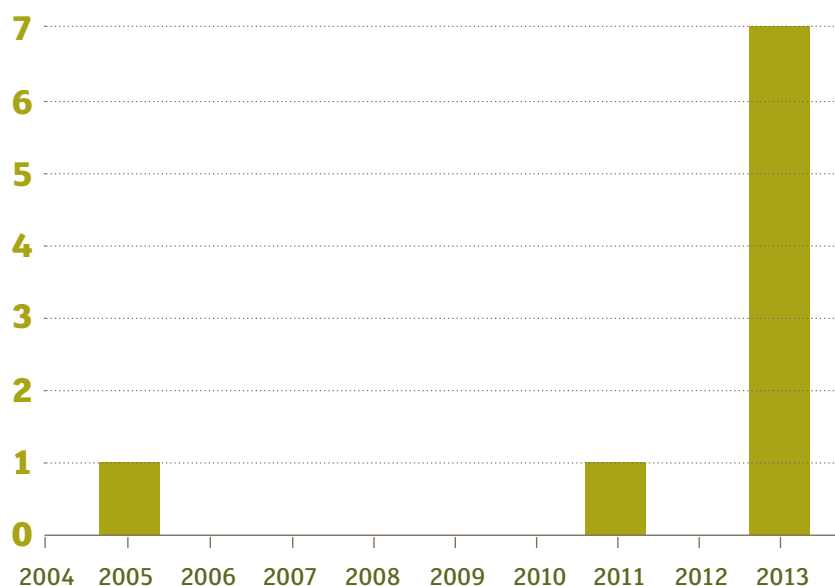
SHARP INCREASE IN THREATS TO PROTECTED GREEN SPACE RELATING TO SCHOOLS

In the summer of 2015 CPRE London began mapping threats to Green Belt and Metropolitan Open Land within Greater London.

In mapping the threats, it became clear that a large number of them related to proposals to build new schools and in some cases to expand existing schools.

The following charts show that the loss of protected green space relating to schools has risen sharply in recent years.

This chart shows the number of approved planning applications for educational purposes leading to loss of Green Belt and Metropolitan Open Land.

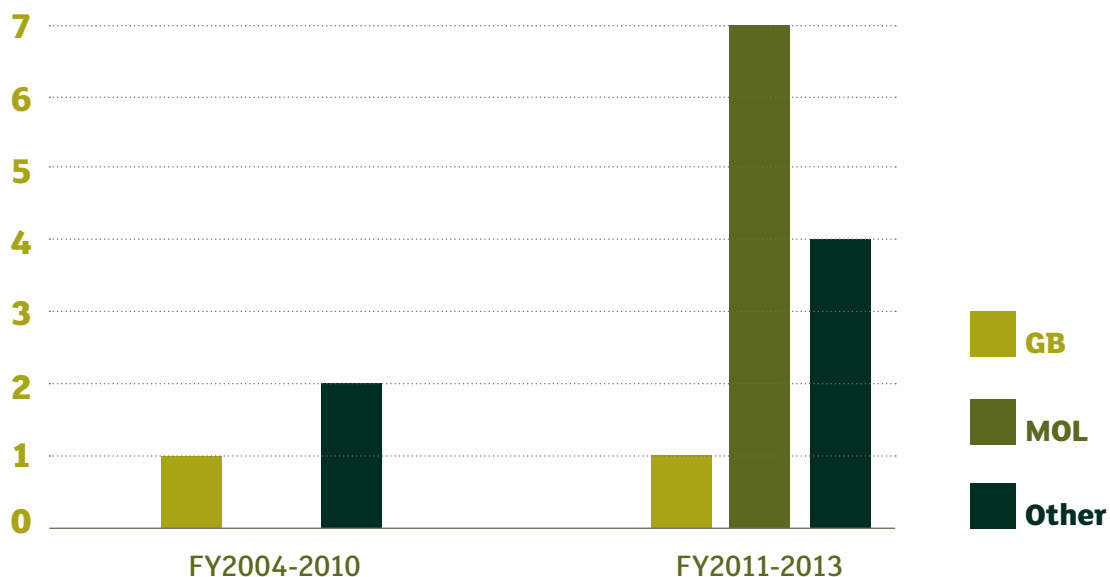


Source: London Development Database

This chart shows the number of approved planning applications for educational purposes (including new schools and expansion of educational facilities) leading to loss of designated open space for the periods

1. Financial years 2004/5 to 2010/11 a 7 year period

2. Financial years 2011/12 to 2013/14 a 3 year period



Source: London Development Database



ISSUES WITH PROPOSALS FOR NEW SCHOOLS ON PROTECTED GREEN SPACE IN LONDON

Many of cases of threats to protected green space relating to new school provision in Greater London which we examined as part of this study exemplify serious concerns about planning process issues.

A 'done deal'

In planning process terms, the most worrying issue is that, in a number of the cases we have identified, the school is in discussions with the Government's Education Funding Agency about siting schools and/or purchasing sites with Government funding, before such sites are either identified in Local Plans for schools, or the subject of planning applications. In our view this is highly prejudicial to the development plan process; it is not transparent and bypasses public consultation; it undermines the proper investigation of alternative sites; and it makes it more difficult for planning committees to refuse permission. It is particularly objectionable if the land is being sold by the local council.

This acts to undermine community confidence in the planning system. For local residents, it feels like a 'done deal'.

- In the White Lodge Hounslow case, the land has been purchased by the Government's Education Funding Agency without the site being identified in the Local Plan and without planning permission. In this particular case, the council issued a letter of 'planning comfort' which a council can do to give developers some certainty that a proposal will be viewed favourably by the planning authority, in order to reduce risk. But in this particular case, the issuing of a letter of comfort gives the appearance of a clear cut case, not the very controversial one it in fact is, according to local campaigners. Among many of the issues they point to, the council itself stated in its sequential assessment of potential school sites, updated in 2014, that the White Lodge ground "was discarded for scoring below the ... minimum threshold"⁴ for selection of potential school locations.
- In the Balmoral Avenue Bromley case, the Academy Trust has completed the purchase of an 11 acre site of green 'Urban Open Space' in Balmoral Avenue without planning permission.⁵ Though in this case the site is listed in the Bromley Draft Local Plan, the purchase of the land and deal relating to the funding of the school pre-empts the outcome of the local plan consultation and, in our view, makes it harder for the council to take on board local objections.
- In the Glebe Land Enfield case, the developer has announced on its website that the land is 'available for development' which, as Green Belt, it categorically is not. Wren Academy, who is working with the developer Fairview Homes, has its interview with the Department for Education on its detailed school application on 4 December 2015. The Enfield Local Plan is up for review soon and local campaigners are very concerned that the council will now

propose the site for development in its upcoming draft Local Plan because of pressure arising from discussions between the Government's Education Funding Agency and the school, and despite local opposition on a major scale.

Sites not in the Local Plan

So called 'plan-led development', which the Government supports, means that, if a Local Plan is up to date and in place, it will identify sites that the Council deems are suitable for particular types of development. An applicant should then show how its proposal meets criteria set out in the plan, in order for it to be appropriate for that particular site.

The Hounslow Local Plan was adopted in the Summer of 2015. The White Lodge site does not appear in the Local Plan. This means the applicant must rely on arguing that there are 'very special circumstances' to justify developing the land.

This is worrying because the Government on the one hand says that it supports plan-led development but on the other hand supports a proposal which seeks to by-pass the Local Plan by relying on arguing there are 'very special circumstances'. In our view this applies de facto pressure on the planning authority to approve the application and it demonstrates a willingness to undermine confidence in a system it says it supports.

Sites are deemed still to fulfil their function as Green Belt or Metropolitan Open Land but are identified for development anyway

In order to propose the de-designation (i.e. the taking away of protection) of a Green Belt or MOL site in its draft Local Plan, a council should conduct a Green Belt / MOL Review which sets out whether land continues to fulfil the function as set out in the designation (see section I).

In Bromley, many Green Belt and MOL sites have been identified for development in the draft Local Plan. However a Green Belt / MOL review which was completely relatively recently in 2012 as part of this process concluded that all of the

sites relating to schools, bar one, continued to fulfil their function as Green Belt or MOL.

Generalised pressures, not 'very special circumstances': the Local Plan

If a piece of land continues to fulfil its function as per its Green Belt or MOL designation, then the council cannot de-designate it and it should remain protected. However, the council can argue that there are 'very special circumstances' to justify building on that protected site as part of the process of putting in place its Local Plan. The phrase 'very special circumstances' means the reasons must be exceptional but also that alternatives have been exhaustively considered: i.e. that there is simply no alternative. It is fair to say that the original intention of the provision was that this should be hard to prove and not happen often.

In the case of Bromley's draft Local Plan:

- not only has no case has been made in terms of de-designation (i.e. to say the land is not fulfilling its function as Green Belt or MOL)
- they also cite a generalised pressure of increased need for school places to justify 'very special circumstances' and
- although they have considered alternatives, this was not on a site by site basis, nor, arguably, exhaustively.

This is a major departure from previous understanding of what the provisions meant. If its approach is accepted by the Planning Inspectorate, then we will be entering a new era in terms of increased threats to protected land.

Generalised pressures, not 'very special circumstances': applications for planning permission

It is possible to apply to build on Green Belt or MOL: this must be justified in terms of 'very special circumstances'. This can happen in two ways. Either the local council uses the process of developing the Local Plan to de-designate land protections as above, OR an applicant can come

forward seeking planning permission for a site. In the latter case the designation would be removed in retrospect because, once built upon, it would be deemed no longer to fulfil its function as Green Belt or MOL. In either situation, a strong case must be made and alternatives must be exhausted.

The need for additional school places is cited in the White Lodge case as the ‘very special circumstances’ which justify development on protected green space – a serious concern because the conclusion of this argument is that generalised pressures which exist across London and elsewhere constitute ‘very special circumstances’. This is a major departure from the letter and spirit of the provisions which in the past have existed specifically to resist generalised pressures.

No ‘need’ for the new school? Local plan-led development vs national schools policy

In some cases local campaigners point to the fact that there is in fact not a ‘need’ for the new school. Although national schools policy does say that demand must exist in order for the Government to support and fund a new school, this is defined as parental demand, which is different to the assessment of demand a local authority makes to discharge its duty to provide school places where there is a deficit. Campaigners in Enfield, for example, cite a recent council report which says there is not a need for places in the area where the new Wren Enfield Academy is proposed.⁶

This creates a conundrum: councils must provide enough school places in the right place and develop their Local Plan accordingly; but schools which come forward as part of national schools policy don’t have to be where there is a deficit. How does the council square this circle in planning terms? Plan-led development must surely still apply in the instance of schools, so what are the planners to do?

The intention here is not to question government schools policy but rather to point to the issues it creates for land-use planning. This is not a new debate. The Local Government Association has called for local authorities to be given “a greater role in judging and approving free school proposals to ensure that new free schools are established where they are needed...There has been much debate about whether a reinvented ‘middle’ tier of oversight is needed to ensure accountability and coherent school place provision.”⁷

Too far from the catchment area

Local campaigners also point to the catchment areas for proposed new schools being far away from the site of the proposed new school. This is linked to the issue above about need and demand i.e. inasmuch as the need or demand may exist (whichever definition) but not in the right place. Planning authorities take this issue seriously because of guidelines on the distance a child or young person should have to travel to school, not only for the child’s sake in terms of time, but also because of the traffic or transport impact, or the need to ensure public transport is in place. Urban primary schools in particular are often required very close to catchment.

Whitton campaigners point out that Turing House School, proposed for a site in Hounslow, is too far from the catchment. Keep Osterley Green in Hounslow also point to a similar issue with the White Lodge site proposal.



PROTECTED GREEN BELT, METROPOLITAN OPEN LAND AND URBAN OPEN SPACE SITES IN GREATER LONDON THREATENED WITH DEVELOPMENT RELATING TO SCHOOLS

Hounslow

Our research shows a number of different threats to protected land across the borough relating to schools.

WHITE LODGE

The White Lodge site is Metropolitan Open Land the lawful use of which is for sports and recreation. As with many playing fields and recreation grounds it has suffered from underinvestment which has led to the claim that the site is underused and derelict. Nonetheless it continues to fulfil its function as Metropolitan Open Land as it has other environmental attributes and has potential to fulfil its sports or recreation function in future when the larger London population will be more reliant on the remaining green spaces.

- **‘A done deal?’** The Government’s Education Funding Agency paid for the site prior to planning permission being granted and despite the controversy over the case.
- **Planning application ‘shambles’** According to local campaigners, there have been almost continual additions of documents by the applicant and the decision date for the application has been postponed several times.
- **Not allocated in local plan** The site is not designated for education use and was not shortlisted in the Local Plan site allocations. The applicant has therefore argued that very special circumstances – that school places are needed – justify the loss of protected green space.

- **The site had been examined and rejected for being unsuitable** Hounslow Council commissioned two assessments of possible school sites across the borough, both of which rejected the White Lodge Club site as being unsuitable. According to campaigners, other suitable sites were then rejected by the applicant. They also point out that the site regularly floods.

Cecilia Hodgson of Keep Osterley Green said:

“Our voice has certainly been heard... There is nevertheless a question about whether, having heard us, some councillors then, instead of acknowledging the strength of our case or telling us where they think we are wrong, try to work out how to circumvent our influence. Our arguments have never been challenged but we are aware of an attempt to reject our case simply on the argument that ‘we need school places’ as if that allowed the authority to wave away all planning guidelines and planning law.”

See http://keeposterleygreen.org/wp-content/uploads/2015/07/KOG_toAreaForum_WebEdn.pdf

White Lodge campaigners Keep Osterley Green



BRENT LEA RECREATION GROUND

Brent Lea Recreation ground is a classic example of a London recreation ground, designated as Metropolitan Open Land. Despite being underfunded, local campaigners say it is used daily as it is a fantastically safe place for children to play and for people to walk their dogs and its proximity to historical battle sites and previous Roman finds makes it of archaeological interest.

Floreat Free School's application to establish a two form entry primary school in Hounslow was

approved by the Department for Education in September 2014. Brentford was chosen by the school as the location and supported by the authority, "due to the high demand for primary school places in that area." The council also said that "Part of the Brent Lea Recreation Ground has been selected as the best option after an appraisal of all site options."

But local campaigners have pointed to other nearby sites which could house the school as well as other misgivings.

“ In June 2015, Floreat Free School were granted planning permission for temporary (2 years) school buildings to be erected on Brent Lea Recreation ground. Despite assurances that it would be temporary, there was veiled implication, more explicitly stated in certain council documents, that the permanent school would also be located there and, shortly afterwards, the London Borough of Hounslow agreed to a 125-year lease of 1.2 acres of the park, for £60,000. This decision was called in, and it was agreed to postpone it until the land was appropriated. Although the London Borough of Hounslow is the owner, there are covenants in place restricting use of the land to leisure and recreation.

There was a strong campaign by local residents: 1,390 people signed a letter objecting to the appropriation and at the eleventh hour Floreat found an alternative site for the temporary school and the appropriation was cancelled. Our group was formed because we believe this organisation still has aspirations to locate its permanent school on the park. Early on in this process, an independent sequential report identified many sites suitable for a school but Brent Lea Recreation ground was not amongst them. There is also a disused primary school, shortly to become vacant, which would cost the Government's Education Funding Agency much less to

refurbish than the proposed £10 million to build a new school and would not result in the loss of Metropolitan Open Land.

We hope to achieve Asset of Community Value status for the park, and secure funding for modest improvements which would encourage use of a unique space (it is enclosed by walls on all sides and not accessible by car) without altering its character, and for community events such as fetes, five-a-side football events, bat walks and picnics. Most importantly, we would like a guarantee from the council that all the green space in our increasingly overdeveloped borough is kept for leisure and recreation.

Katherine Kaufman,
Friends of Brent Lea Rec. ”

The Friends have established a petition which gives more detail.⁸



HOSPITAL BRIDGE ROAD SITE, WHITTON

The 16 hectare green space behind Hospital Bridge Road, Whitton, is designated as Metropolitan Open Land.

According to Richmond Council, over the past year, the Government's Education Funding Agency has been working with the Russell Education Trust to identify a permanent site. Richmond Council has supported this search. In August 2015, the Russell Education Trust announced that an agreement has been made with Hounslow Council to build a school on their site in Whitton though, as Richmond Council's website goes on to say, "the school is still subject to planning permission and full consultation as part of that process."⁹

The proposed school will result in the loss of this designated green space.

A local petition states "The general consensus from the people of Whitton, Teddington, Fulwell and surrounding areas is that they cannot believe that Richmond Council have just announced officially that Turing House's permanent house is indeed the Whitton site."¹⁰

- **A 'done deal'?** Richmond council confirmed that the site is the chosen permanent site for the school and the search was supported by the Government's Education Funding Agency. The process of choosing a site does not require public consultation and the local community feel they have not had their voices heard.

- **Not allocated in local plan** The site is not allocated in Hounslow's Local Plan for educational development.

- **Need for school places** Local campaigners say that the Turing House School would not serve the needs of the local community. At present 80% of the proposed pupils will be from Teddington, Hounslow, which is the temporary location of the school. It will more than double the area needed to travel by pupils to school as the overwhelming majority will come from a different Borough.

Furthermore, this particular area of Whitton is already well served by 4 other primary schools and 2 large secondary schools and as such school places are not needed in this area.

- **Alternative sites** Local residents feel that a number of other plausible locations for the school have been discounted with no reason.

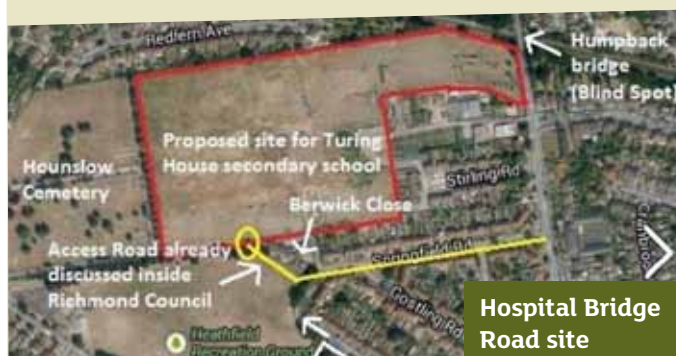
Sarah Whelan of Whitton Against Turing House said:

“Myself and many residents feel that we have no voice when it comes to the site for Turing House school. It feels very much like this is a done deal which has been conducted behind closed doors with little or no thought given to the enormous impact on the local environment and residents.

It makes no sense whatsoever to build a school on this site as the local children won't be able to use it. There is no need for a school in this area.

It will also have a dramatic effect on the surrounding area. There has even been talk that in order to provide safe access for the children to the site (as it stands there are no safe access points) they will need to build a new road across the rec on Powder Mill Lane, ploughing up another much needed green space.

Once this land is used for a school site it will be lost forever.



GRASSHOPPERS RUGBY FOOTBALL CLUB

Get West London reported in May 2015 that the HIP (Hounslow Improvement Partnership) School, a new secondary free school set up by head teachers in the area, which is due to open in 2017, is in line to move to Grasshoppers' current grounds.¹¹

The rugby club, whose current ground is on Metropolitan Open Land, has been offered a new site adjacent to the school which is proposed for

the White Lodge site, to allow their current site to be used for the HIP school. Although we have not yet found any details about any proposed development, it seems likely this will also lead to loss of MOL in Hounslow. We are unaware if a decision regarding this has been made.

Enfield

THE GLEBE LAND, SOUTH OF ENFIELD ROAD

This is an area of Green Belt south of Enfield Road, known locally as the Glebe land. According to local residents, for many years this land has been used for grazing horses and is the habitat for a wide variety of wildlife, including hedgehogs, bats, muntjac deer, pheasants, owls, woodpeckers and many species of birds. It also contains specimens of ancient oak trees and hedgerows.

It has been the subject of a pre-application consultation by Fairview Homes for the development of a secondary school as well as 300 homes. Major local opposition has already mobilised and a petition has reached over 4,000 signatures objecting to the development of the land.¹²

- **A 'done deal'?** Fairview Homes has listed the site as available for development on their website, giving the impression that there is no restriction to building on the land. Wren Academy submitted their application for the new school to the Government's Education Funding Agency in October 2015 and is being interviewed on the 4 December 2015. Local residents are concerned that the land will come under threat because of the Government's involvement.

- **Not (yet) allocated in local plan** This site has not been allocated for development or educational use in the Local Plan. Campaigners also point out that "The field remains an important part of the Green Belt. Even as recently as November 2014, when the borough's current Development Management Document was adopted, the field was included in the Merryhills Brook Valley section of Enfield's Green Belt which was described as *an important area of high quality open landscape with a special character which is highly valued.*"¹³

They are very concerned that the site is likely to be allocated in the upcoming draft Local Plan due for consultation this winter.

- **No need for a school in this area of Enfield** Fairview Homes started investigating the site prior to the publication of a report by the Council that suggests there is no need for a school in this area of Enfield. A report published by the council suggests that this is the case. The pre-application proceedings by Fairview have continued despite this.¹⁴

Caroline Frisk of Enfield RoadWatch said:

“ Enfield RoadWatch Campaign Group has collected over 4,500 signatures from residents in a petition to ward off unneeded and unwanted development on local Green Belt fields. The case for preserving the 35 acre Green Belt site from 300 new dwellings and a secondary school was presented by the group at a full council meeting in Enfield last week.

The new school would also be poorly located, being within sight of Highlands, an outstanding and much valued existing community secondary school and Southgate, another outstanding secondary school, both within one mile of these fields. Both these schools would wish to expand in the future if the government provided the relevant funding. This would also help with envisaged budgetary constraints and meet the expectation of parents and their needs across the whole borough.



Enfield RoadWatch asserts the rights of residents to quality of life without this unnecessary threat of development hanging over the community. Enfield councillors from all parties have expressed a general wish to preserve the Green Belt. The Local Plan is being revised next year. We do not wish for the Government's Education Funding Agency to be pursuing this site as a location for an unwanted school.

”



GROVELANDS HISTORIC PARK, ENFIELD

Enfield Borough Council is consulting on ideas for building a new school on part of the historic parkland of the former Grovelands House, which is also designated as Metropolitan Open Land and was once part of a Royal Hunting forest in the 12th century.

The Grovelands Residents' Association and Friends of Bournside Sports Ground said “We are aware of council plans for a primary school on part of the site.

We stand together opposing this. Better sites are available to meet the undoubted educational need with a less destructive impact. The land should be revitalised to retain and enhance its existing sporting use.” In recent news, the council has applied to Historic England for a decision in principle on whether a primary school is acceptable in principle on the Grovelands site.¹⁵

Bromley

17 PROTECTED GREEN SITES IN BROMLEY

Bromley council's consultation on its draft Local Plan closed in October 2015. In the draft, 17 protected green spaces were allocated for the development of new, or expansion of existing, schools. Of these sites eight are Green Belt, four are Metropolitan Open Land and five are Urban Open Space.

In October CPRE London responded to each of these cases as part of the local plan review process.¹⁶ Our main objections were:

- **No 'very special circumstances'**

The increased need for school places is a general pressure and does not constitute the 'very special circumstances' needed to justify building on Green Belt or MOL. The protections are there precisely to resist such general pressures to develop green land.

- **Removal of Green Belt and MOL processes**

The appropriate means to de-designate these protected spaces is through a Green Belt review. This had been carried out and the sites were

found to meet the criteria for their designation and as such their status should remain in place. (Note that, due to a recent housing development, it is recognised that the allotments site may no longer meet Green Belt criteria, but it does meet Metropolitan Open Land criteria so should not have its protection level changed).

THE FORMER COOP SPORTS GROUND

One of the sites in Bromley's Local Plan Review was the former Coop Sports Ground, Balmoral Avenue. It is designated as Urban Open Space which means it has a level of protection from development albeit not the highest level afforded to the Green Belt and MOL categories. The site is one of those proposed for a new school in the Bromley Local Plan.

- **A done deal?** The Beckenham Academy, it seems, has been in negotiations to purchase the site for a new school since January 2015. They are now the owners of the site despite the council still considering the responses to their Draft Local Plan consultation, despite the Local Plan not yet having been officially agreed by the council, and despite it not yet having been submitted to the Planning Inspectorate for approval.



Bromley allotment – one of the sites identified in the Local Plan.

Harrow

WHITCHURCH PLAYING FIELDS

Less worrying than most of the cases set out in this report, Whitchurch Playing Fields will be partly retained for their intended use, however the Council has approved a proposal to build Avanti House Secondary School on Whitchurch Playing Fields, which are designated as Urban Open Space and playing fields. The fields are used by 35 local schools and there was concern locally that access should remain for those schools.

In a March 2014 debate in Parliament, MP Bob Blackman, Conservative Harrow East, said “I have secured this debate because it is vital that the

playing fields are preserved for the use of all the schools that need them. I also believe that the site should be put into the hands of the Avanti Schools Trust, on the condition that the majority of the fields continue to be used, as they are now, for local sports, schools, and local communities.”

The planning application for the school was submitted by the Department for Education and the Avanti Schools Trust in October 2015.

Hillingdon

LAKE FARM COUNTRY PARK

This is a case where the school has already been built. Lake Farm Park Academy was given the go ahead despite the area being Green Belt. Five and a half hectares of land have been lost to the Academy including a children's play area, the place which held the Park's green flag and well used pathways.

In March 2013 GetWestLondon reported that “Campaigners who have fought long and hard to save Lake Farm from development have been dealt a bitter blow, after the controversial green belt school proposed at the park was given the go-ahead at a stormy council meeting.” Speaking after the meeting, MP Mr McDonnell said: “I am bitterly disappointed but not surprised. It was not democratic, and I've never seen a council meeting descend into such a shambles.”¹⁸

The Council gave its approval to the scheme despite the Mayor of London raising a number of major concerns and Transport for London highlighting that the school would lead to traffic problems. Hayes and Harlington MP John McDonnell was one of five petitioners who spoke on behalf of the hundreds of campaigners who have strongly opposed the idea



of a school in that location ever since it was first mooted back in July 2011.

The paper also reported that alternative site search saw 26 possibilities all of which were disregarded and that the demand for school places had reduced.¹⁹

In Hillingdon's Local Plan review (consultation ongoing until 8 December 2015) the council has proposed to remove the site from the Green Belt, including the playing fields, which would leave open the possibility of further development down the line, and which shows clearly how incremental development can threaten larger areas of protected land over the longer term.



WHY ARE SO MANY CASES OF THREATS TO GREEN BELT AND METROPOLITAN OPEN LAND IN GREATER LONDON RELATED TO SCHOOLS?

Looking at the cases set out in this report, a number of conclusions can be drawn:

- 1.** Sites are being identified for schools without reference to the Local Plan, undermining the proper investigation of alternative sites through the democratic planning process.
- 2.** A justification for including the site in an upcoming Local Plan review, or for seeking planning permission, is then retrospectively constructed by citing the need for school places.
- 3.** The need for school places is often questioned by local residents; the need for school places may be defined differently by government supporting 'demand' for free schools catering for a wide area, as compared to local authorities defining local need.
- 4.** The 'need for school places' is being cited as an 'exceptional circumstance' (required to build on Green Belt or MOL) though it is clearly a generalised pressure and not an 'exceptional circumstance' as per the intentions of the Green Belt and Metropolitan Open Land provisions.
- 5.** The involvement of the Government's Education Funding Agency at an early stage puts pressure on planning authorities to consent to developments, and undermines public confidence in the planning system to mediate fairly between competing interests for the use of land.

FOOTNOTES

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6. enfieldroadwatch@gmail.com
7. <http://www.parliament.uk/business/publications/research/key-issues-parliament-2015/education/school-places/>
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