



Part B - Please use a separate sheet for each representation

Name or Organisation: Brentford Community Council

3. To which part of the Local Plan does this representation relate?

Paragraph(s)	b, d, e, f	Policy	CI2	Figure/Site	
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4. Do you Consider the Local Plan is:

(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
ii) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
iii) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Before commenting on the soundness of these policies the Brentford Community Council took advice on the current level of education provision in Brentford. This advice was that, like Central Hounslow, Brentford was a "hot spot" where despite every effort to make the maximum use of existing school sites, provision of school places was already inadequate.

The planned expansion of the Brentford residential population in the plan period to 2030 would greatly increase the number of pupils with a statutory right to primary and secondary education, and increase the need for further education and training. The Borough relies on open market provision of new schools such as Academies or Free Schools. Unfortunately, such provision cannot match the site value of speculative residential development. However none of the Site Allocations where education is a possible use allocate Education as the only use.



In particular Site Ref 16, Commerce Road, is the only place in the East of the borough with secondary school potential but is described as “mixed” with education as only a possible rather than a required use.

CI2 b. “Other school providers” only support single sex or faith schools in the east of the borough. There is no plan for provision of mixed schools for those of no faith, although this is the greatest unmet demand.

CI2 d. Mixed use sites are untried in the borough. No assessment has been made of obvious disadvantages of education and residential uses on the same site, such as noise, vehicular traffic generation, and safety of children. For these reasons it is particularly unsuitable for nursery and primary school provision.

CI2 e. This may refer (inter-alia) to the West London University in Brentford which has been crowded into high rise accommodation adjacent to the M4 and which has no room to expand. No sites are identified, or are likely to become available in the plan period.

CI2 f. The council has recently sold off a pre-school centre and we are concerned that the number of places available to working parents may be diminishing. This policy is unsound because there is no plan for increasing provision to keep pace with the needs of our rising population. The sites allocated are inadequate to meet the growing needs for education places. The demand for competitive uses reduces the land available and tends to further increase site costs.

The Council does not have, nor can have secure funding to ensure that any proposals can be securely funded without recourse to Free Schools and Academies over which it has no control.

(Continue on a separate sheet if necessary)



6. Please set out what modification (s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. *(NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).* You will need to say why this modification will make the Local 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.

CI2 "Our approach" add the text "In line with the phased expansion of residential accommodation we will designate sites for pre-school, primary, secondary and further education use only together with the necessary secure finance to ensure that places are available before new residents occupy their new homes."

CI a. add the text "with preference for provision of mixed schools for those of no faith or with regard to the type of unmet demand if appropriate.

CI2 b. add the text "In the event that it proves impossible for statutory education obligations to be met we will seek to defer additional residential development until sites and finance are available."

CI2 d. Replace the existing text with the text:
"Assess the mixed-use of sites which are suitable for delivering secondary and tertiary education facilities for their impact on the other uses such as residential, to enable the provision of needed school places within the borough;

CI2 e. Omit this Policy

CI f. add the text "and require large residential development sites to provide on-site provision of these facilities."

(Continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination.

Yes, I wish to participate at the oral examination



8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To clarify the reasons why the plan is fundamentally unsound

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.

9. Signature:

Date: