

Appendix 1 - Consultation Summary

1. Brookside Primary School

1.1 No objections were received to the proposals to enlarge the premises of Brookside Primary School. This proposal is therefore not contentious.

2. Grange Park Infant and Junior Schools

2.1 No objections were received to the linked proposals to enlarge the premises of Grange Park Infant and Junior Schools. These proposals are therefore not contentious.

3. William Byrd Primary School

3.1 No objections were received to the proposals to enlarge the premises of William Byrd Primary School. This proposal is therefore not contentious.

4. Cranford Park Primary School

4.1 There were 3 individual objections to the proposals to enlarge the premises of Cranford Park Primary School. Each objection made several specific points on similar themes which can be grouped together. Table 1 below provides the Local Authority's response to each general theme of objection for the Cranford Park Primary School proposals.

Table 1:
Concerns of parents and residents for Cranford Park Primary School

Theme	Point Of Objection / Concern	Local Authority Response
General	Not in favour of proposal	The Local Authority has a statutory duty to provide sufficient school places for its residents, and a robust detailed analysis has identified a need for more primary school places in the vicinity of the chosen schools. The chosen schools offer the best solution available to the Local Authority to provide sufficient school places in the required timescale.
Staffing	Concerns of recruiting satisfactory teachers in times of shortage / increased pressure on current teachers	Currently there are no recruitment issues with regards to teachers being recruited for the start of the forthcoming academic year, and none expected for school year 2011/12, although recruitment does become more difficult during the course of the school year. One area that is sometimes difficult to recruit for is Early Years. Nevertheless there should be no additional pressures caused by the lack of satisfactory teachers as supply is currently fulfilling demand.
School Standards	Reputation & standards would be put at risk	There is no conclusive evidence, nationally or internationally, that firmly supports the view that school standards are affected by school size,

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		and additional information on this is provided in Appendix 2.
Planning	Increased traffic and pedestrian congestion around the school gates	Any traffic and congestion issues will be addressed by the Local Planning Authority at the planning application stage, which will follow after the Hillingdon Council has decided whether or not to proceed with the proposals.
Consultation Process	Delayed communication of proposals from school	The Local Authority issued consultation letters to schools on June 11th 2010 which allowed for 4 weeks of consultation. Letters addressed to parents were included and were to be circulated by the school to parents.
	Decision already made	The Local Authority has set out proposals for school expansion, but the final decision on the proposals must follow statutory consultations with all key stakeholders whereby all views will be taken into account. No final decisions have yet been made. Certain bodies (specified in school organisation regulations) will have the right to appeal to the Schools Adjudicator against any final decision taken by the council.
School Facilities	Lack of sufficient dining & catering facilities, staggered lunch break	For the suitability and sufficiency of school facilities, the Local Authority will refer to national school building standards when formulating the specific detail of the expansion proposals.
	Outdoor play space already congested / H&S issues	For play and recreation areas, the Local Authority will refer to national school building standards and Health & Safety regulations when formulating the specific detail of the expansion proposals.
	Reduce nursery places to allow expansion	The Local Authority also has a statutory duty to commission sufficient nursery school places for children reaching age 4 during the school year. Although the private sector provides some nursery provision in Hillingdon, the evidence is now clear that there will be increased demand for this service area in Hillingdon's maintained schools, so it would not be appropriate to use nursery accommodation for older children.
	Premises already extended with Portacabins	The Local Authority will look at school sites as a whole when formulating robust long term plans for the expansion of school premises. This may include the replacement of portacabins in the long term, although in the short term it is envisaged that some additional portacabin type structures may be necessary until more permanent structures are erected.

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	Use unoccupied rooms in the school rather than building new classrooms	The Local Authority has considered this already, and some under-utilised rooms will indeed be used as classrooms in the short term, if the proposals are approved. However, there will be an insufficient number of rooms within the school to sustain higher pupil numbers in the long term.
Chosen School	Build a school on RAF Uxbridge or elsewhere which is central or another site / school. Is there a future impact on secondary schools?	It is unlikely that additional places in central Uxbridge would serve the rising demand in the Cranford area. The Local Authority is undertaking a review of potential new school sites as well as negotiating a potential new school within the RAF Uxbridge site. However the level of expected demand for school places will require both new schools and expansions. The Local Authority can confirm that in future years, the pressure affecting primary schools will also mean that more secondary school places will be required.
	Most Hillingdon schools are 2fe / Cranford Park is already one of the largest in the borough.	Of Hillingdon's current 65 primary schools, 32 schools are of 2 forms of entry or less, while 33 schools are already greater than 2 forms of entry. Cranford Park is currently a 3-form entry school and the proposal is to expand the school to 4-forms of entry. There are already 6 schools of 4-forms of entry size. There is no conclusive evidence, nationally or internationally, that firmly supports the view that school standards are affected by school size. Additional information on this is contained in Appendix 2 .

5. Whitehall Infant & Junior School Schools Objections

5.1 There has been a robust opposition to the Local Authority's proposals at both the initial consultation stage and at the representation stage following the publication of proposals. In total there were 97 responses, with 8 clearly supportive and a further 6 expressing some support but with concerns. All of the rest were objections. The responses included 3 petitions and several specific points made by the governing bodies of both schools. The 3 petitions contained a total of 631 signatories.

5.2 Local Authority's response to all points are set out in sections below to comprehensively address the concerns raised by parents and residents; the joint Governing Bodies; and petitioners.

Objections by parents and local residents

5.3 Table 2 below provides the Local Authority's response to each general theme of objection from residents and parents.

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Table 2:
Concerns of parents and residents for Whitehall Infant and Junior Schools

Theme	Point Of Objection / Concern	Local Authority Response
General	Not in favour of proposal	The Local Authority has a statutory duty to provide sufficient school places for its residents, and a robust detailed analysis has identified a need for more primary school places in the vicinity of the chosen schools. The chosen schools offer the best solution available to the Local Authority to provide sufficient school places in the required timescale.
	Adverse effects on centenary celebrations	The Local Authority will work closely with the schools to ensure that, if the proposals are approved, any necessary building works are scheduled to cause the minimum possible amount of disruption to the school's celebrations.
	Affordability, considering the economic climate	The Local Authority has given assurance that sufficient funds are available for the proposals. Further details are given in the Finance sections of the main report.
School Standards	Reputation & standards are already good / or would be put at risk	There is no conclusive evidence, nationally or internationally, that firmly supports the view that school standards are affected by school size. Additional information on this is contained in Appendix 2 .
	Reduced level of one to one time with educator / supervision / quality of support to SEN children would diminish	With an increased number of pupils the schools would receive extra budget provision and therefore the quality of provision of support services should not diminish.
	Create imbalance / increased number of children with English as a second language / quality of support to children with English as a	There is no conclusive indication as to whether the proportion of children requiring additional language support would increase. However the trend within the borough and in London as a whole would suggest that it is a possibility. Nevertheless with an increased number of pupils, the schools would receive extra budget provision and therefore the quality of provision of support services should not diminish.

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	second language would diminish	
	Increase cost of educating each child e.g., teaching staff / teaching assistants / support staff	There is no conclusive evidence that larger schools generate increased costs per pupil, and the accepted wisdom is that larger facilities tend to generate better economies of scale. This is often a factor determined by how individual schools are managed. An increased pupil intake will attract more funding on a per pupil basis and it is therefore envisaged that a school expansion would not be detrimental in terms of costs per pupil.
	Contradicts LBH Amalgamation Policy / OFSTED inspection findings about 4FE schools	The Local Authority's Amalgamation Policy does not recommend against 4FE schools. It is not clear which OFSTED findings are referred to but Hillingdon does already have several viable 4FE schools, whilst research indicates no clear link between school size and standards. Additional information on this is contained in Appendix 2 .
	Would result in a larger & more impersonal school, thus affect children / school and wider community adversely	The Local Authority acknowledges that in this set of circumstances, a larger school may present more potential for impersonal relationships. However, the Local Authority also believes that such an environment can be avoided through the continuance of good relationships, excellent teaching, and involvement with parents and the local community.
Demand Analysis And Chosen School	Demand analysis is incorrect or misleading / disagree that places are needed in Uxbridge or in the Uxbridge-West Drayton corridor / presumption that RAF Uxbridge is the cause of demand.	A detailed analysis by the Local Authority in summer and autumn 2009 concluded that a significant number of primary school places would be required due to a sudden shift in migration patterns and a substantial increase in births. The evidence that has emerged since then strongly supports the Local Authority's conclusions that at least 19 forms of entry are required in school year 2012/13, and that several forms of entry will be required before then. Applications for September 2010 Reception confirmed the forecast pressure for school year 2010/11. Demographic data released by the GLA and ONS in spring 2010 now confirms the Local Authority's earlier indication of long-term sustained pressure for school places. In fact, since the 2009 analysis evidence is now emerging that migration pressure continues to worsen and births continue to rise, which could mean that future school place requirements may rise further.

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		<p>With regard to the previous number of primary school places along the Uxbridge-West Drayton corridor, the decline in available places from 2005 to 2009 reflected the removal of surplus capacity at several primary schools (including the Whitehall schools) in order to make more efficient use of resources. As demand has turned upwards, these places now need to be re-instated subject to appropriate consultations. Places previously removed at Longmead Primary School have already been re-instated. The Local Authority is proposing the re-instatement of places at Colham Manor Primary School and the Whitehall schools in this region. Additionally, previously removed places at Ryefield Primary School are being re-instated on a temporary basis subject to further review.</p>
		<p>With regard to the predicted demand for Reception places within the Uxbridge-West Drayton corridor (School Planning Areas 6,7,10,13 and 14) the Local Authority's 2009 analysis predicted 1,034 Reception children for September 2010. By July 8th 2010 the total Reception offers for all schools within these areas totalled 1,032 - therefore achieving 99.8% of the predicted figure at that point in time. Future demand predictions are now supported by births data released by the ONS and population projections supplied by both the GLA and ONS.</p>
		<p>With regard to whether the expected demand for places around Uxbridge by school year 2012/2013 is related to the RAF Uxbridge development, the Local Authority can confirm that this is not the case. The expected demand by school year 2012/13 reflects the substantial increase in local births in calendar year 2008, plus the impact of some new housing developments already constructed. The impact of RAF Uxbridge has been phased into pupil forecasts on a gradual basis from 2013 to 2020, with few units expected to be complete by 2013. The long term need for the Uxbridge area has now been identified as 4-forms of entry when the full impact of RAF Uxbridge is included, for which the Local Authority hopes to secure a 3-form entry school within the RAF Uxbridge site. To aid understanding of the underlying school places pressure around the Uxbridge area, please refer to the recorded ward births attached</p>

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		as Appendix 3.
	Put pressure on other smaller schools nearby / increase imbalance between local schools as already take pupils outside of catchment area	No schools have a defined catchment area. For strategic planning purposes, the Whitehall schools are expected to take most of their pupils living within Primary Planning Area 6 which consists of the Uxbridge North, Uxbridge South, and Brunel wards. However in practice, anyone can apply to attend any school, and families further afield may still want a school place, particularly if they have a sibling in attendance. There will be no imbalance because all other local schools are expected to be full, as is the case already at Hermitage Primary School, St. Mary's RC Primary School, and St. Andrews CE Primary School.
	Expansion of catchment area would mean less children will be able to walk to school	No schools have a defined catchment area and it depends on local demographics and school popularity. Rather than increased travelling, as local demand increases it is more likely that the opposite will happen, with schools filling from smaller areas. One of the main objectives of the proposals is to provide sufficient local school places in order to prevent increased travelling distances to schools further away that may have some capacity. The council runs an initiative to encourage walking (or cycling) to schools and the Whitehall schools do participate in this programme.
	Build a school on RAF Uxbridge or elsewhere which is central or another site / school	The Local Authority is undertaking a review of potential new school sites as well as negotiating a potential new school within the RAF Uxbridge site. At this stage there are no potential school sites within central Uxbridge whilst the earliest that the council can expect delivery of a new school within RAF Uxbridge is 2013 - and only then if several external factors are expediently resolved. However the level of expected demand for school places will require both new schools and expansions. The long term need in Uxbridge is now identified as 4-forms of entry with pressure beginning from September 2011.
	The council has been slow to acknowledge and manage the need for extra school places, thus resulting in temporary places and late	The council has recognised for several years a need for additional primary school places around Uxbridge and has worked with the MoD to try and provide a large school at the RAF Uxbridge site. However, the need for new places has come sooner than anticipated because of a sudden reversal in migration patterns (impacting now) and a larger than expected rise in births (to impact from 2012). Neither factor was

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	consultations	successfully predicted by professional demographers. The emergence of the migration factor in 2009 has indeed left a short time for preparing plans and consultations, and temporary places across Hillingdon this year have been unavoidable.
	What are the implications for secondary schools?	Rising demand for primary school places will impact upon secondary schools several years later, and the council is also in the process of assessing this impact.
Consultation Process	Lack of consultation with the school and detailed accommodation plans	So far there has been a dialogue with the Whitehall schools since autumn 2009 in an effort to jointly prepare robust proposals for school expansion. Proposals have now been prepared by the Local Authority, although the Governing Bodies have raised some concerns. The intention is for the Local Authority to work with the Governing Bodies in a constructive way to jointly formulate the specific details of accommodation required at both schools.
	Lack of consultation prior to letters with parents e.g. detail limited or misleading	The Local Authority issued consultation letters to schools on June 11th 2010 which allowed for 4 weeks of consultation. Letters addressed to parents were included and were to be circulated by the school to parents. Letters included a detailed summary of the reasons why additional school places are required.
	Decision already made / undemocratic process	No decision has been made yet. The council has published proposals and, as required by law, given stakeholders opportunities to respond. This report contains all points made during the consultation process, including the views of petitioners expressed at a meeting on November 8th. Decisions will be taken by the full Cabinet of Hillingdon Council after considering the evidence. If the council decides to conditionally approve the proposals, the governing bodies will have the right of appeal.
School Facilities	Classroom sizes currently insufficient and would worsen with additional pupils	Any new and additional classrooms will be designed and built with regard to the latest national school building standards and regulations. Old classrooms may not meet modern area recommendations, but the building guidance (Building Bulletin 99) is aimed at new build projects and is non-statutory.
	Hall / ICT suite / cookery suite / music & dance studio / washing & toilet facilities	For the suitability and sufficiency of school facilities, the Local Authority will refer to national school building standards when formulating the specific detail of the expansion proposals.

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	/ would be put under pressure and pupil learning would be limited.	
	Disruption to learning caused by building work	If the proposals to expand the school are approved, any disruption during the building phase will be kept to a minimum. Ideally it would be preferable to undertake most building work during school breaks, but the schedule of work will depend upon other approval processes (such as planning permission) with the fundamental key milestone of delivering additional school places in time.
	Lack of sufficient dining & catering facilities, staggered lunch break	For the suitability and sufficiency of school facilities, the Local Authority will refer to national school building standards when formulating the specific detail of the expansion proposals.
	Loss of already limited outdoor play space due to new buildings & building of extended services	For outdoor play space, the Local Authority will refer to national school building standards and statutory playing field regulations when formulating the specific detail of the expansion proposals.
	Extra cost of equipping new classrooms not taken into consideration	This cost will be taken into consideration.
	Less extra-curricular activities & clubs	In some cases, schools have taken the opportunity to make effective alternative use of class room accommodation (e.g. for extended service provision) if it was not currently needed for classrooms. Accommodation planning will be sensitive to schools' individual circumstances. However, it will not always be possible for such dedicated use to continue, especially where similar facilities cannot be made available to other schools
	MUGA impractical e.g. further from toilets and where would play equipment go?	The proposed MUGA would allow intensive use and is in that sense practical. Its location has been discussed with the schools. The management of play equipment is an issue for the school, but additional storage space is part of the proposals.
Planning	Loss of natural	Any local environment issues will be addressed

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Issues	habitat 'The Grove' e.g. newts etc.	by the Local Planning Authority at the planning application stage, which will follow after the council has decided whether or not to proceed with the proposals.
	Insufficient parking facilities & extra congestion etc. / including pedestrian traffic and single site entrance	Any traffic and congestion issues will be addressed by the Local Planning Authority at the planning application stage, which will follow after the council has decided whether or not to proceed with the proposals.
	Upkeep of 'un-adopted' roads	Any local roads or amenity issues will be addressed by the Local Planning Authority at the planning application stage, which will follow after the council has decided whether or not to proceed with the proposals.
	Disruption to residents caused by building / children's centre / lack of privacy / overlooked	The Local Authority will be sensitive to local residents when conducting the actual building works. These proposals are completely separate from the proposals for a Children's Centre. Privacy concerns can be addressed at the planning application stage.
	Increased risk of accidents due to extra congestion (H&S).	The proposals take into consideration the congestion issue and alternative exist may form part of the final proposals.
	Pressure on public transport routes & infrastructure	Transport assessments will be required as part of the planning application process. The proposals will only progress if planning permission is granted.

Concerns raised by the joint Governing Bodies of Whitehall Infant and Junior Schools, June 2010

5.4 A series of specific concerns were raised by the joint Governing Bodies at a meeting held on June 22nd 2010. The Local Authority's response to this series of questions is presented below:

- *Reasons why the Whitehall schools have been proposed for expansion*

5.4.1 A combination of rising birth rates and migration means that the council now needs at least 19 (and probably more) additional forms of entry in primary schools between now and 2014. Exceptional demand arising from recession factors has increased demand in 2009 and for September 2010 but the main reason for additional places is demographic change. The scale of required school places means that all primary schools need to be assessed for expansion potential. The council is also looking at alternatives (e.g. new school sites). However, the timescale by which places are needed and the availability of new sites mean that a large programme of

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expansion of existing schools is needed in all areas of the borough. Within this programme, expansion of more schools to four forms of entry is considered necessary. In the first phase proposals, Cranford Park and Grange Park schools are also being asked to expand to four forms of entry.

5.4.2 In planning additional places, the council has to consider meeting local needs and, in particular, the avoidance of excessive home to school journey times for young children. If the council does not have sufficient capacity in each local area, this would lead to some children having to travel a considerable distance for a school place. This may not be feasible for all parents and could have detrimental effects in relation to attendance and the ability of children and their families to access extended services. The council also has to take into account that some children will not be able to access some local schools because of the different admissions criteria applying to different types of school. Even if pupils travelled to schools further away, this would not be a sustainable solution as demand for places grows in those areas.

5.4.3 The projected long-term need for places in the school place planning area including the Whitehall schools is now four forms of entry. Only approximately half of this demand relates to the development of the RAF Uxbridge site. The council is putting considerable effort into securing new provision at the RAF Uxbridge site but the maximum that the proposed school site can accommodate is three forms of entry. At present, it is not known when this provision will be available but two forms of entry will be needed locally for September 2012. Therefore at least one permanent and at least one temporary expansion will be needed by then. With regard to a suggestion about using Uxbridge High School, under current school area guidance the Uxbridge High School site is not large enough to support a primary school.

5.4.4 Of the other schools serving the Uxbridge area, two are voluntary aided schools and discussions with the diocesan authorities have indicated there is no long term potential for expansion at either St. Mary's RC Primary School or St. Andrews CE Primary School. One other school, Hermitage Primary School, is located on a small site that would not comfortably support a permanent expansion to two forms of entry. In contrast, the Whitehall schools were previously functioning as 4 forms of entry schools for a number of years until 2005.

- *Concerns regarding change of ethos & standards*

5.4.5 Expansion is a change for any school and the council understands the concerns with regards to maintaining the ethos of the schools. However, the change would be more gradual in that one additional class would enter the school each year, and the new admission number would work through the year groups incrementally. The council also believes that it is possible to maintain a 'small school feel' within a larger school, though it may entail different ways of organising. The council would look at whether there are any ways in which the related building development can support maintaining a small school feel.

5.4.6 With regard to size and standards, there are examples of successful four forms of entry schools in Hillingdon. Additionally, all-through three forms of entry primary schools (ages 4 to 11) are already larger than either of the Whitehall schools would be following an expansion to four forms of entry. Whilst the council

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acknowledges the challenges and changes that expansion to four forms of entry would bring, the council does not believe that the size inherently compromises standards and safeguarding. The council would support schools that are expanding as much as possible to safeguard standards.

- *Accommodation Issues & Funding*

5.4.7 In some cases, schools have taken the opportunity to make effective alternative use of class room accommodation (e.g. for extended service provision) if it was not currently needed for classrooms. Accommodation planning will be sensitive to schools' individual circumstances. However, it will not always be possible for such dedicated use to continue, especially where similar facilities cannot be made available to other schools.

5.4.8 At present, Primary Capital funding has been earmarked to support the first phase of expansions but this is only part of the larger programme and the council's Cabinet is aware of the financial implications. Depending on existing accommodation, some expansion projects will require more capital investment than others. Schemes will be developed in consultation with schools. Details of proposed investment would be included in the formal statutory proposals.

5.4.9 In terms of meeting accommodation needs for expanded schools, consideration has been given to capacity for essential services, such as school meals and kitchen facilities. With regard to play areas, the dynamics of the site will change as infants now require some soft play, social, informal and habitat areas (all green space). However as a confined site, the council will consider adding some form of multi use games area (MUGA, which will double-up as play areas). It is also envisaged that any existing garden spaces could be retained, or relocated if necessary.

- *Pedestrian safety*

5.4.10 Concerns have been raised about potential health and safety issues at the school's entry point on Cowley Road. This will be considered by the Local Planning Authority at the planning application stage, and any recommendations acted upon.

Specific points of objections made by the Governing Bodies, October 2010

5.5 During the statutory notice representation period the joint Governing Bodies submitted a 19-page letter of objection with a series of specific points, some of which echo themes raised earlier either by the governing bodies or by other stakeholders. The Local Authority's response to each specific point made is set out in Table 3 below.

Petition Hearing

5.6 On November 8th 2010, the Cabinet Member for Education & Children's Services held a meeting with 3 petition groups who expressed opposition to the Whitehall schools proposals, and this meeting gave the petitioners an opportunity to elaborate on their views before final decisions are taken by the council. The points made by the petitioners are also addressed within Table 3 below.

Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

Governing Bodies' Letter References	SPECIFIC POINTS	LOCAL AUTHORITY RESPONSE
Main Letter 1.1 - 1.3	The Department for Education Guide on Expanding a Maintained mainstream school states that stakeholders views should be taken into consideration and the Decision Maker (the council) should consider a variety of prescribed criteria before making a decision.	The Local Authority has carefully considered various options for meeting the long term demand for school places in the Uxbridge area. The expansion of the Whitehall schools remains the best option. However, this is a decision for elected members to make, and before doing so they will indeed have regard to the statutory guidance issued by the Department for Education. All views expressed during the consultation process will be presented to the elected members to allow them to make a fully informed decision.
2.1	Problems experienced after temporary expansion	
	GENERAL: WIS was contacted by the LA in March 2009 and requested that WIS take an additional 30 children in September 2009 as an emergency measure as there was a severe shortage of reception places in the LA. WIS agreed to temporarily increase its admissions from 90 to 120 reception children under condition that the LA resolve the issue as it could not take an additional form of entry in September 2010.	Since temporary arrangements were made for September 2009, the Local Authority has indeed explored other avenues to provide local school places for September 2010. The LA has so far avoided a 4th form of entry at Whitehall for September 2010, despite widespread pressure for places. However going forward, additional local school places will be required from September 2011 and the Whitehall proposals offer the best solution.
	REFURBISHMENT: Refurbishing a classroom which had previously been used as a store and small group room to accommodate the additional reception class. There are no sink facilities in the class and no nearby toilets leading to many (preventable) accidents during the year. A permanent increase in numbers will mean this classroom will have to be used again. The refurbished reception classroom does not meet	In the latest capacity assessment the school identified this as a classroom. The school has the required amount of toilets, although access from this classroom could be better. None of the existing reception classrooms meet BB99 guidelines but this guidance is non-statutory and is not retrospective, it provides recommendations for new build.

Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

	<p>BB99 Guidelines.</p>	
	<p>PUPIL DROP-OFF/PICK-UP POINTS: There have been significant problems getting all of the parents and children into and out of the school and classrooms at the beginning and end of every day, despite creating an extra entrance.</p>	<p>The new proposals will divide access into the school between two major access points from two different roads which will considerably reduce the congestion now centred on the one major access point in Cowley Road.</p>
	<p>CATERING / DINING: Lunchtimes were (and continue to be) particularly difficult trying to get 120 4-year old children through lunch without them feeling rushed but ensuring they eat their food. The current dining facilities are inadequate for this number of children. Other WIS children also suffer as queuing times have increased, choice becomes restricted and the food often cold for those at the end of the queue.</p>	<p>Dining in for all infants and PE is a problem. The expansion proposals will provide the school with the means to address this issue.</p>
	<p>LOSS OF EXTERNAL PLAY AREA: Since September 2010 the 120-children year group has moved into Year 1. The main play area is significantly more crowded with more small injuries occurring. If expansion goes ahead, one third of the existing play space is going to be taken up by the proposed Infant extension, further exacerbating these problems</p>	<p>The existing play area will be reduced if building work takes place. However, an extra 2,500 sq m will be provided by installing a 'multi use games area' (MUGA). As a rule of thumb, as long as 2 sq m per pupil is provided, this would be sufficient. More area will be provided under the LA proposals. We will however need to reallocate site areas between the schools inline with the guidance rather than try to retain the current demarcation lines.</p>
	<p>LOSS OF EXTENDED SCHOOL ACTIVITIES: WIS has had to suspend all extended school activities (e.g. parenting classes, English for adults, which are important in enabling some parents to support their children's education) as there are no rooms to safely carry out these activities.</p>	<p>The school only has to provide access to the extended services core offer. Services do not have to be directly delivered on the school site and they may signpost to other delivery partners and still satisfy the core offer requirements in the interim. In accommodation terms the school has had spare accommodation with they have used for extended services during the school day. The new buildings being proposed can still be used and could enhance extended school and community usage, although the timing of use and events may need to change.</p>

Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

	<p>PUPIL FUNDING: Despite promises made from March to August 2009, funding for the additional children was not received until September 2009 and the LA made no further contact with the school regarding further expansion until November 2009.</p>	<p>The authority recognised the need to fund the additional places at the school from September 2009-March 2010, but had to seek school forum approval to apply the Expanding Schools Factor retrospectively. This was agreed at the July 2009 meeting and the funding was released as planned in September 2009 when the school took on the additional form of entry.</p>
2.2	Whitehall functioning as 4fe schools	
	<p>WIS and WJS have never operated as 4fe schools and there was never a 'surplus' of places at WIS and WJS.</p>	<p>This is incorrect. The Whitehall schools began operating as 4 form entry schools from September 1996 following a decision taken by the council in February 1996. The pupil numbers referred to are correct, and the problem in filling all available places is the reason why the schools were allowed to fall back to 3 form entry schools. The decision to lower the schools' Published Admission Number of 120 places legally required a Public Notice, which was published in February 2004 and sent to the Schools Adjudicator. The schools remained as 4 form entry until September 2005</p> <p>Net Capacity surveys not only reflect a school's accommodation, but also a school's admission number and how a school uses accommodation to meet its admission number. Thus, the Net Capacity of Whitehall Infant School in 2004 (when still a 4 form entry school) was 346 places (close to the required 360 places) and the Net Capacity of Whitehall Junior School in 2004 (when still a 4 form entry school) was 430 places (short of the required 480 places). Most of the school accommodation that was present as 4 form entry schools remains in place. Value for money is an important consideration, and the availability of existing school accommodation is a key factor in concluding that the Whitehall schools offer the best solution to provide additional school places in the required timescale.</p>
	<p>There was only ever one year group of 110 that started at WIS as a 4fe in Reception in 1998. This year group got gradually smaller until in Year 6 in 2004 in WJS there were 96 children (run in 4 classes for educational reasons).</p>	
	<p>There have occasionally been year groups of more than 90 children in the past 10 years, but a single year group has never exceeded 98 (see above). There has never been an occasion when two or more year groups in either school exceeded 90 children.</p>	
	<p>Throughout the last 10 years there have never been more than 257 children in WIS (excluding Nursery) until 2009 when 120 children were taken into reception. The number of children in WIS in the last 2 years has been 293 and 297 respectively, which is above the 270 capacity as defined by the Net Capacity Survey.</p>	
	<p>Throughout the last 10 years, there have never been more than 336 children in the WJS, close to the 348 capacity as defined by the Net Capacity Survey.</p>	

Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

2.3	Home School Travel	
	<p>The Department for Education Guide on Expanding a Maintained mainstream school states in paragraph 4.36. that proposals should not have the effect of unreasonably extending journey times or increasing transport costs, or result in too many children being prevented from sustainable travel options.</p>	<p>The school expansions are focussed on those areas where there is population growth and there is going to be subsequent pressure on school places; in that regard the specific choice of schools for expansion is specifically addressing the school's statement. The distances it is envisaged children will travel to school (bearing in mind the Whitehall Schools are located in a relatively dense urban area) will not prevent sustainable travel patterns. The Council would work with the school to consider sustainable travel patterns through tools such as the school travel plan.</p>
	<p>The LA is not providing sufficient local school places and expanding WIS and WJS will make this situation worse. Because the 3 closest schools (all 1fe) are full, even more parents will walk past these schools on their way to WIS and WJS. The LA has not considered the effect of this proposal on home school travel and increased traffic and congestion which will occur.</p>	<p>The proposals are to provide sufficient local school places available to the whole community. The Whitehall schools are easily accessible from north Uxbridge, south Uxbridge, Cowley and Brunel and will offer school places to children regardless of any particular faith.</p>
	<p>Whitehall schools pupils live on average over 0.7 miles from the site (distances as the crow flies). There are 2 primary schools within half a mile of the Whitehall site, a further 2 schools within 1 mile and a further 6 within 2 miles.</p>	<p>In a dense urban area there is often overlap of people's addresses and the nearest school location. This in part can be because of historical factors such as a parents desire for children in the same family to attend the same school. Locally, there are 2 local faith schools with restricted in-take. The nearest community primary school is Hermitage Primary School in Belmont Road, north Uxbridge 1km away. The next nearest school in this school planning area is The Cowley St. Laurence Church of England School, 1.6km south of the Whitehall schools. The average travelling distance to the Whitehall schools is reasonable. The council is working with the Whitehall schools to develop a robust school travel plan.</p>
	<p>Over 25% of the children live more than one mile from the Whitehall site and go past at least one other school on their way to WIS and WJS.</p>	
	<p>Over 44% of children live further than half a mile away and live closer to or pass another LA or VA primary school but come to Whitehall Schools.</p>	

Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

	Recent research from the Department of Transport showed that only 48% of 5-10 year old children walk to school with over 43% travelling by car. The report also states that since trips to school take place at around the same time each day, they have a major impact on levels of congestion in some areas. At the peak travel to school time of 8.45 am on weekdays during term time, two in ten (20 per cent) car trips by residents of urban areas were generated by the 'school run' in 2008 (Source: National Travel Survey 2008, Department for Transport). If numbers in WIS and WJS increase by 210 then 43% of these trips will be made by car which will generate more than 50 extra cars journeys to and from the Whitehall School sites twice every day.	It is inevitable that school expansion will generate more traffic. The Local Planning Authority will need to consider whether the impact of additional traffic has an adverse impact on the safe and efficient operation of the highway network. For many new developments it is possible to design mitigation schemes where junction improvements or new road markings address direct impacts on the highway network. The correct vehicle to consider such matters is either a Transport Statement or a Transport Assessment. Such a document would provide the evidence base to determine highway impacts and mitigation measures if required. The Transport Statement or Transport Assessment is something that would be prepared to support a planning application. School Travel Plans are also an important tool to reduce car journeys and the consequent impacts on the highway network.
2.4	Imbalance in current school provision in School Planning Area 6:	
	Whitehall Schools are already the biggest of the 5 schools in the planning area accounting for 3/8 of the total capacity. If WIS and WJS were increased to 4fe they will be one third bigger than St Mary's, St Andrews and Hermitage put together.	These are factual statements. The two local Voluntary Aided schools exist on small sites and provide a small number of places for their particular faith. Hermitage Primary School also exists on a small site. It would be difficult and costly to expand these schools permanently.
	Of the 9 1fe schools in LBH, one third are in planning area 6 (St Andrews, St Mary's and Hermitage). The other school in the planning area is a 2fe school (Cowley St Laurence).	
	WIS and WJS already have the largest proportion of free school meal children compared to the 3 closest schools (18.3% and 21.9% compared to 2.9%, 4.4% and 11.7% respectively; Source LBH 2010 census). The level of free school meals is often used as a deprivation index.	

Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

	<p>WIS and WJS already have the highest number of casual admissions compared to the 3 closest schools (9.2% and 11.3% compared to 5.7%, 5.7% and 4.8% respectively; Source LBH 2010 census). This puts strain on the staff assimilating and incorporating new children.</p>	<p>This is also a factual statement, but is selective and therefore misleading. Another school in this school planning area is Cowley St. Laurence which had 10.5% of children casually admitted in 2009/10 (source: LBH 2010 PLASC pupil census). This is comparable (and falls between) the numbers for Whitehall Infant and Junior Schools. The borough average for casual admissions is 8.2%, so the Whitehall schools are slightly above the average level.</p>
	<p>WIS and WJS have high proportions of special needs children (29.6% and 20.7% compared to 13.1%, 17.0% and 34.2% respectively; Source LBH 2010 census).</p>	<p>The figures referred to by the schools are children with SEN but without a statement. Another school in this school planning area, Cowley St. Laurence, has a 28.2% incidence of non-statemented SEN, whilst the borough average for non-statemented SEN is 22.3%.</p> <p>The figures for statemented SEN at local schools shows that Whitehall Infant and Junior Schools has a lower proportion of statemented children (1.4% and 1.0% respectively) than Hermitage Primary School (1.5%) and St. Andrews CE Primary School (1.9%), and are comparable to Cowley St. Laurence Primary School (1.3%) and St. Mary's RC Primary School (1.0%). The borough average for statemented SEN is 1.5%. (source: LBH 2010 PLASC pupil census).</p>
	<p>Although the number of Ethnic minority children are comparable (66.4% and 56.5% compared to 40.4%, 59.3% and 51.5% respectively) the numbers of EAL children are much higher (47.7% and 40.8% compared to 21.2%, 6.5% and 31.9%; Source LBH 2010 census). Again this puts considerable strain on resources.</p>	<p>This is a factual statement. The proportion of children with EAL at Whitehall Infant and Junior Schools is higher than at other local schools, and is above the borough average of 39.3%. The reasons for this imbalance are not clear and would require further research.</p>

Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

2.5	Contribution to raising local standards and adverse affects on children:	
	<p>The LA has not considered how its proposals will affect the current and future children at the schools, and has not demonstrated how the proposed expansion will contribute to raising standards and improve the education of these children. The schools will have to teach groups of 30 in 'small group areas' (as defined by BB99 Guidelines).</p>	<p>Old school buildings do unfortunately have classrooms smaller than new build standards. BB99 guidance is not retrospective and it would not be expected, reasonable, or practical, to enlarge every school classroom. Nevertheless, school building projects do provide opportunities to look at and re-model school areas to meet modern standards, and it is possible that some school areas may be remodelled as proposals are progressed, subject to available funding and timescales.</p>
	<p>Making it harder for staff to form relationships with children and follow their progress throughout school.</p>	<p>There is no firm evidence for the assertion that relationships formed within a school should be detrimentally affected by school size.</p>
	<p>Making lunchtimes and playtimes much more crowded with large numbers of children in a constrained space, increasing the number of small accidents and behaviour problems.</p>	<p>The existing play area will be reduced if building work takes place. However, an extra 2,500 sq m will be provided by installing a 'multi use games area' (MUGA). As a rule of thumb, as long as 2 sq m per pupil is provided, this would be sufficient.</p>
	<p>Considerable disruption to children during building works which will last for more than one year, permanently taking away one third of existing play space and temporarily using approximately half of the field throughout the building works.</p>	<p>This will be discussed with builders and the two schools as the proposals are progressed and implemented. The Local Authority will aim to cause minimum disruption and make maximise use of any resources available to the school. There will be some disruption and a loss of some areas during construction. However, the proposals will provide approximately 2500m² of play area which is a net gain.</p>
	<p>Overwhelming pressure on existing school facilities, including specialist teaching areas (ICT, Library etc), inadequate hall space and not being able to have whole school gatherings, lack of toilets and washrooms, etc...</p>	<p>Facilities concerns are addressed at sections 2.11 - 2.18 of this table.</p>
	<p>Increasing frustrations with parents trying to get their children to and from school through an overcrowded entrance with increased traffic levels.</p>	<p>This point is addressed section 2.3. of this table.</p>

Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

	The Department for Education Guide on Expanding a Maintained mainstream school states in paragraph 4.20 (about the decision stage) that the proposals should contribute to raising local standards of provision and lead to improved attainment etc.	In providing sufficient local school places in time, these criteria will clearly be met. There is no reason to believe that standards of provision and attainment will suffer, and in fact Appendix 2 points to published research which indicates no apparent link between school size and school standards.
	There has been no communication from the LA identifying the educational benefits of expanding WIS and WJS and the response in the Cabinet report is an opinion. The LA has not demonstrated that an expansion will contribute to the raising of local standards and its only justification for expansion is to provide additional places and not improve educational standards.	The Local Authority's response in the previous report is indeed an opinion. Importantly, it is an opinion supported by published research from the NFER. The schools are correct in stating that the proposals are only to provide additional places - that is the fundamental goal of the proposals. Once those places are provided, the Local Authority holds the opinion, supported by published research, that there is no clear link between school size and school standards and therefore there should be no good reason why standards cannot be maintained or improved.
	WIS and WJS have higher proportions of under-performing groups (FSM, SEN and EAL) compared to neighbouring schools. The LA has not considered this in its deliberations and (as far as we are aware) has not satisfied itself that the attainment gap will be narrowed.	This point is addressed section 2.4. above.
2.6	Alternative solutions:	
	The LA does not accept that the Whitehall schools are located on a small site (BB99 guidance defines the site as 'confined') site <i>that would not comfortably support a permanent expansion to 4 forms of entry.</i>	The Local Authority does consider that the Whitehall schools should be treated as a confined site, and if carefully managed with robust proposals are sufficiently large enough to support a 4 form of entry school under the existing school area guidelines. This can be achieved with the provision of a MUGA and with the provision of some nearby off-site playing fields. The Local Authority proposals contain the possibility of using fields along Whitehall Road within a few hundred yards of the schools. This possibility has been discussed with the council's Green Spaces officers and would require executive approval. It is also important to note that the definition of a confined site does not in itself preclude any further expansion, and allowances are typically made for schools sited in

Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

		built up urban areas.
	There were no discussions on expansion with the local Voluntary Aided schools until June 2010 which was far too late and discussions should have taken place at a much earlier stage. This was reported by a senior LA Officer to the Whitehall Schools Joint governing body meeting in July 2010.	This is incorrect. The Local Authority's first discussion with VA authorities about growing primary school needs, including the Uxbridge area, was held at the Civic Centre in November 2009. As had been agreed with the governing bodies of Whitehall schools earlier in 2009, the Local Authority explored the possibility of expanding the VA schools in the Uxbridge area as alternatives to expanding Whitehall. The meeting referred to by the schools (June 2010) was a follow up meeting to discuss more possibilities at all VA schools across Hillingdon, and possibilities for the Uxbridge area were again explored with the same conclusions.
	It has long been recognised by the LA that Hermitage school is on a restricted site, and in the past the LA has investigated rebuilding this school on other sites including Hillingdon House Farm. Recent large LA developments have taken place on Hillingdon House Farm (swimming pool, running track) but rebuilding Hermitage as a 2fe or 3fe school was not considered. A new 2fe or 3fe school could still be built at this location which would solve the shortage of places problem.	The governing bodies refer to a long-held conclusion of the Local Authority that the Hermitage school site is tightly constrained and would be difficult to expand. With regard to re-locating the Hermitage school to a larger site, this would be something for the Corporate Landlord to consider. However it is clear, at this point in time, that there are no sites immediately available, should that option be considered. The most likely site for a new school or any relocated school remains RAF Uxbridge, and the earliest that the Local Authority could expect this to be ready is late 2013 - and even then, that is dependent upon some expedient external decisions. Therefore, there is an undetermined period during which additional school places need to be provided, and the Whitehall schools offer the best solutions for stable additional places.
	Identifying other land for a new school (e.g. land South of Pield Heath Lane, Court Park, Hillingdon House Farm or the Sandersons site.) which could be used to build another school or replace an existing 1fe school).	
	Placing a (temporary or permanent) primary school on the Uxbridge High School site. The Cabinet report said that 'With regard to a suggestion about using Uxbridge High School, under current school area guidance the Uxbridge High School site is not large enough to support a primary school'. The	

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	<p>current Whitehall schools site is also under current school area guidance to support a bigger school, but expanding WIS and WJS has not been rejected.</p>	
	<p>Temporarily increasing the intake for one year only of neighbouring schools. WIS did this in September 2009 and this large year group is progressing and being managed through the school. If each neighbouring school took an additional 1fe in turn this would increase overall capacity by 120 over 4 years and give the LA time to find long-term solutions.</p>	<p>This would not be the Local Authority's preferred solution. It would offer a disruptive pattern of provision for a period of a few years, on the anticipation that a new school would definitely be available at a certain point in time. Even so, the level of demand expected to come through in 2012 and 2013 (when the delivery of a new school is unlikely) is such that other local schools might need to offer places <i>as well as</i> the Whitehall schools, rather than instead of.</p>
	<p>Bringing forward the building of a new school on RAF Uxbridge site. There are provisional plans for a 3fe school but these could be revised so the school is enlarged to a 4fe school.</p>	<p>This option of bringing forward the provision of a new 3fe school is being pursued as vigorously as possible, but the earliest that this seems achievable is at least 2013 - and even then, this is dependent upon various external factors.</p>
		<p>At the Petition Hearing on November 8th, it was suggested that Uxbridge High School would now be willing to, and has capacity to, contain a primary school of 2 forms of entry.</p> <p>Until recently the Uxbridge High School site formed part of the council's Building Schools for the 21st Century programme, and had been earmarked for expansion. The BS21 programme has only recently been cancelled.</p> <p>If the proposals presented here are rejected, the Local Authority would need to investigate and consider this as a potential alternative. However, an initial assessment indicates that the site would require extensive MUGA areas to contain both a 2fe primary school and maintain its current admission number. This would also prevent the provision of additional secondary school places in the future, when the current primary school pressure reaches secondary schools. It would require a new statutory consultation process to change the school's age range and would be unlikely to</p>

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		offer a solution within the required timescale.
2.7	Working with the LA:	
	The LA does not work closely with WIS and WJS on building projects. There has been a very strained relationship between the schools and the LA over the Children's Centre development.	It should be understood that these proposals are completely separate to proposals for a Children's Centre.
	The LA submitted and obtained planning permission in July 2009 for a Children's Centre to be built on the school playing field without discussion or consultation with either school. After a great deal of effort the schools convinced the LA to change these plans but the schools are still not kept up to date with progress. The most recent example is that the schools were not informed that revised plans had been submitted in July 2010 and the item was on the August Planning Agenda.	Nevertheless, the school was involved in all aspects of the Children Centre design & location from the initial identification of the site. The school were involved in the initial application, when it was first raised by the school that they were unhappy with the scheme. A subsequent application was made which will be considered by the appropriate committee in November. Officers have attended governing body meetings to present the second ("B") scheme. The builders compound is an issue of logistics and should be agreed on site. The foot path can be located to suit the schools' requirements, and this has been confirmed to the Chair of Governors. The bin store will be a condition of planning. As to not being kept up to date, this is refuted by council officers as the chair of Governors attended the last planning committee to speak in support of the scheme at the request of officers.
	There are still unresolved issues linked to the Children's Centre (e.g. path to school, builder's compound, bin store etc). The schools are not kept up-to-date with changes to the plans or likely submission dates to the Planning Committee.	
	Unsuccessful attempts have been made to work with the LA to help reduce traffic and make access at the Whitehall site and entrance safer. School suggestions have included changing the road layout at front of school and opening the back gate to ease congestion at the front but the LA has given no practical assistance and offered no other solutions. The only concrete action taken by the LA was misguided and made things worse (putting a fence around the bus stop).	These concerns have been passed on to planning and highways officers and will be addressed at the planning application stage.

Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

	<p>The LA has not considered that this is the worst time major building works can take place at the school. If the plans do go-ahead, the School will be a building site for the whole year of the centenary celebrations with one half of the field and one third of the hard play space being unavailable. This is because the LA will lay the foundations for the MUGA and then move the existing portable accommodation (which WIS has to continue to use) onto this MUGA base. The rest of the MUGA base will be used as a works compound with works vehicles driving up and down one side of the field.</p>	<p>This will be discussed with builders and the two schools as the proposals are progressed and implemented. The Local Authority will aim to cause minimum disruption and make maximum use of any resources available to the school. There will be some disruption and a loss of some areas during construction. However, the proposals will provide approximately 2500m² of play area which is a net gain.</p>
2.8	Lack of consultation over detailed accommodation plans	
	<p>Lack of consultation in several areas including not considering petitioners' views, wider issues e.g. pedestrian safety, congestion & traffic, local road network, local amenities, environmental issues.</p>	<p>The DfE regulations for consulting on school organisation proposals have been followed. All views are taken into account in this report, including petitioner's views. Planning issues are addressed as best as they can be at this stage and will be fully addressed, as appropriate, by officers at the planning application stage. If the proposals are approved, they will be on the condition of obtaining planning permission. These concerns are addressed in more details in sections 2.9 and 2.10.</p>
	<p>The LA has not consulted realistically and not taken the schools' views into account. There is a lack of ground and play space and both schools have suggested building on 2 levels but this has not been considered by the LA.</p>	<p>Both schools made a formal decision to oppose expansion and were made aware that due to the time scales involved, the development of proposals would have to continue. WIS was very cooperative and did participate in consultation at an early stage, whilst WJS took a different approach. The LA did present the proposed schemes to the schools for comment.</p>
	<p>In WJS there are areas which could be built above (onto a second level) or the existing 3-class block could be rebuilt on 2 levels and would be in keeping with the rest of the WJS building. This was rejected by the LA. In April 2009 the school was shown a</p>	<p>Building the proposed accommodation at WIS over two levels would not incur significant extra cost (minor extra circulation). However wherever possible, the LA tries to keep infant accommodation at ground floor level. The brief given to the design team suggested 2-storey might be considered, but the conclusion was to build a single</p>

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	<p>new block on 2 levels containing 4 classrooms and one hall. Without consultation or discussion this design was changed to a single storey extension.</p>	<p>story structure, and this conclusion was in accord with the WIS commissioned feasibility study promoted by the school. The LA looked at both single and two story options for WJS. The conclusion was that to provide a viable 2-storey option would (a) require the demolition of three existing classrooms; (b) need the provision of temporary accommodation throughout the contract period; (c) extend the contract period; (d) cause disruption to the schools' service delivery over a longer period; and (e) require approximately 66% more funding than the single story option. If the proposed accommodation at both schools were to be built over 2-levels the Whitehall schools would still be considered as a confined site and be treated accordingly by the LA under the DfE key formulae.</p>
	<p>The reasons given for building on one level with an increased footprint are that building on two levels was 'too expensive'. It seems the LA would prefer to make WIS and WJS 'confined site' schools and use valuable open green areas for building.</p>	
2.9	Untimely consultation	
	<p>DfE regulations state that the proposer should consider the views expressed before deciding to publish proposals, and that this was not done with regard to petitions. This goes against DfE advice and the council's standing orders.</p>	<p>No standing orders or school organisation regulations have been disregarded or breached. The general views of petitioners, as expressed in their written submissions, were included in the report made to the Cabinet Member in August 2010. The decision then taken by the Cabinet Member in August was to continue with further consultations (through a statutory publication and representation period). The petitioners were also allowed the opportunity to verbally present their views at a meeting on November 8th 2010, before this Cabinet meeting to determine the proposals. The views expressed at the Petition Hearing are contained in this report. As there have been objections to the proposals, the decision on the proposals must be taken by the full Cabinet and not the Cabinet Member.</p>
	<p>The Department for Education Guide on Expanding a Maintained mainstream school Paragraph 1.6 states that</p> <ul style="list-style-type: none"> • At the end of the consultation the proposer should consider the views expressed during that period before reaching any final decision on whether to publish statutory proposals. <p>The Council Standing Orders relating to petitions says</p> <ul style="list-style-type: none"> • The Cabinet Member will consider the report (relating to the petition) at a meeting that will be held in public. The Council has rights for petitioners and as such you have the right to come along to the meeting to discuss the matter with the Cabinet 	

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	Member so that he is fully aware of your views before he makes a decision.'	
	Petitions with a total of 631 signatures were submitted on 11th July by WIS and WJS. None of the petitioners were contacted and no discussions took place before the Cabinet Member took the decision to publish statutory notices and proceed to the representation. This is against both the guidance published by The Department for Education and Council Standing Orders as an irrevocable decision has been taken without consultation.	
2.10	Lack of Consideration of wider issues	
	<p>The LA is not considering any of the wider issues involved in expanding the school and not looking holistically at the situation. The schools believe that these important issues must be addressed as part of this expansion proposal and solutions identified to these many difficult issues before responsibility for the decisions is passed onto another LA group (Planning Committee).</p> <p>Although it is accepted that only the Planning Authority can decide planning issues, many of the other issues need to be addressed and resolved prior to planning permission being submitted. If the LA does not give consideration to these issues and identifies solutions as part of these expansion proposals there is the risk that planning permission will not be granted and the issue of additional capacity will not be resolved or severely delayed.</p> <p>This demonstrates that the LA is not considering the</p>	<p>With respect to wider environmental and planning issues, the Council is mindful that the Environment Agency will require a sequential assessment to be undertaken. The Whitehall schools are not in a floodplain, not in a Conservation Area, do not have listed buildings, are not in or adjoining a nature reserve. Nonetheless a planning application will have to be determined on its own merits. Technical reports would need to be prepared to support the planning application (e.g. a Transport Statement or Transport Assessment would fully evaluate highway impact). The Council cannot pre-judge future planning applications. The practicality of school extensions, and ensuring they do not adversely impact on neighbours, is a matter for the appointed architect and then the Local Planning Authority. The Council could design a brief for the architects to minimise environmental impacts. If Cabinet approves the proposals at this stage, it must only do so on condition of obtaining planning permission. This indeed does introduce risk to the proposals, and this is true for all of the proposals presented here. Due to the timescale for providing sufficient school places, some decisions taken by the council will need to be taken at risk of the separate planning application process.</p>

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	wider issues for children, local residents and the wider school community and are only interested in providing additional spaces.	
	Heightening the problems with the local community as the site becomes more crowded with children and buildings.	
2.11	Alternative use of accommodation:	
	BUILDING BULLETIN 99 SCHOOL AREAS GUIDELINES : With the changing curriculum (with inclusion, every child matters and extended schools, etc) any 'spare' spaces that may have existed are now used for other required and essential activities. It should be noted that: • WIS is considerably below the number and space used for 'Learning Resource Areas' recommended in BB99 for a 3fe school with a nursery (one space of 21sqm vs. recommended 62sqm) • WJS is only marginally above the 'Learning Resource Areas' spaces recommended for a 3fe (80sqm vs. 69sqm).	Whitehall Infant School is below BB99 recommended area guidelines for this type of space, and this is also true for approximately 40% of primary schools in the borough. Up to this point in time, how space has been utilised is a matter for the school and it should be noted that the school has had surplus spaces since falling to 3 forms of entry in 2005. Nevertheless, additional areas are proposed to make the school function effectively as 4 form entry and the school has been encouraged to participate in formulating the proposals to make the most effective use of space. For Whitehall Junior School, there is currently sufficient Learning Resource Area space to meet requirements for both a 3fe school, and the school has been encouraged to participate in formulating proposals to make the most effective use of space as a 4 form entry school.
	Following the temporary expansion of WIS in September 2009, extended schools activities are not possible and have been suspended and the school could potentially be penalised by OFSTED.	The school only has to provide access to the extended services core offer. Services do not have to be directly delivered on the school site and they may signpost to other delivery partners and still satisfy the core offer requirements in the interim.
2.12	WJS classrooms:	
	The LA did not address nor answer the original point about current classrooms. BB99 guidelines recommend that the minimum class size of 49sqm to carry out many activities with a 30 children in a	The current guidance is non statutory and not retrospective (for old buildings) and unfortunately it would be impractical to address every instance, however all new accommodation will comply.

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	class, including whole class teaching, group discussion; literacy, numeracy and other subjects; practical 3D and construction work; drawing, sketching and working with compliant materials; science, art and DT.	
	Six of 13 existing classrooms in the WJS are below this minimum space requirement for basic teaching and are classified in BB99 guidelines as 'Small Group Rooms'. These classrooms can neither accommodate nor be used for teaching groups of 30 children.	The Net Capacity details the current school accommodation and how it is used. Small classrooms by definition do not necessarily equate to small group rooms. Under the BB99 non-statutory guidelines and the Net Capacity formulae, the rooms referred to can comfortably accommodate 27/28 children each and would have been originally designed (under previous standards) for 30 children. These rooms are proposed to be reverted classrooms, but some additional space is also being provided within the LA proposals for the purpose of small group teaching.
	This situation is currently managed by the school as there are smaller year groups and there is currently one 'spare' classroom. After the proposed expansion there will be no 'spare' classrooms and all of these small group rooms will have to be used for class teaching.	As WJS already use these rooms for class teaching, and sets for part of the day, this can continue and additional space is being provided within the LA proposals for this purpose.
2.13	WJS hall(s):	
	There is currently one hall and one studio at WJS. To comply with BB99 guidelines it will be necessary to remove all equipment from the existing school hall to enable 480 children to be accommodated in one hall (although they will not be able to sit down at the same time). WJS recently 'borrowed' (small) Infant children and found that the main hall could only accommodate approximately 400 (very cramped and small) children.	Currently overall hall space within the Junior school meets the standards set out in BB99, when taking into account the Local Authority proposal of using a large space as a studio (currently used as an out-of-school club room). With regard to loose PE equipment stored around the hall, this could pose H&S risks in an active space and these needs to be managed by the school.
	The LA are proposing to build an external store for the hall equipment to make more space in WJS hall, however this store will take yet more play space, will	The new hall store is proposed at 14m ² internal space. If needed this could be increased and the impact on the playground would be minor.

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	not be large enough for all of the equipment and will add considerably to the time taken to set-up and put away before and after each lesson.	
	<p>Section 2 of the BB99 guidelines states that</p> <ul style="list-style-type: none"> • In any primary school, the total area for halls and studios should include at least one hall or studio for every 200 pupil places. <p>After the proposed expansion the school will potentially have 480 pupils, however the LA is not proposing to add a 3rd hall for school use (even if there were space to put one) and is therefore not complying with regulations.</p>	The reference made (to non-statutory guidance) is an example of what hall space might be offered. In fact the BB99 worked examples set out other examples, indicating fewer halls with larger areas. The Local Authority's proposals will ensure that overall hall space will meet modern guidelines. For reference, the BB99 formulaic recommendations ($100+0.3N$ where $N = 480$ pupils when expanded) suggests overall hall space of 244m ² . The school currently has a large hall of 180m ² and the Local Authority proposes using another large space as a studio.
2.14	WIS toilets:	
	<p>The Education – school premises regulations 1999 relating to sanitary fittings require that schools should</p> <ul style="list-style-type: none"> • . . . contain a number of sanitary fittings which is at least equal to 10% of the Number of Pupils at the school who have not attained the age of 5 years and 5% of the Number of Pupils at the school who have attained that age. 	The project manager will work with the schools to ensure that the statutory requirements for sanitary fittings are met.
	<p>WIS does not have enough sanitary fittings. There are currently 24 toilets in WIS, 16 in the main school and 6 in the Nursery. Last year with 120 children in reception, there should have been 21 toilets in the main school (5 more than are currently provided). After expansion 24 toilets would be required to comply with legislation. The LA proposals provide a total of 18 sanitary fittings.</p>	Reference to the "main" building is misleading as two sets of toilets in other blocks have been ignored. According to the school capacity assessments and surveys, existing toilet units total 33 including those for staff. The LA proposals will provide a total of 37 units including staff. This would be above the minimum required amount.
	<p>The Chair of Governors wrote to the Local Authority on 1st April 2010 and again as part of the original consultation in July seeking clarification of this issue but I have yet to receive a reply. We have also</p>	The Local Authority had understood that the meeting held at the schools, with the governing bodies, on June 22nd 2009 appropriately discussed and recorded the concerns of the earlier letter. The concerns raised at that meeting were contained in the

Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

	asked without success for LA assistance in providing extra toilets in the Reception area.	report to the Cabinet Member in August, and they are again presented here for Cabinet to consider.
2.15	WIS washroom facilities:	
	The Education – school premises regulations 1999 relating to washrooms require that : <ul style="list-style-type: none"> • In the case of a school with pupils who have not attained the age of 5 years, at least one shower, bath or deep sink shall be provided for every 40 such pupils, the number of such pupils being rounded up to the nearest multiple of 40. 	This point is acknowledged and will need to be addressed.
	One shower is currently available at WIS. With a reception intake of 120, plus 40fte nursery children 3 additional fittings will be required. The LA proposals do not provide additional such fittings and therefore not complying with legislation.	This point is acknowledged and will need to be addressed.
2.16	School fields and play space:	
	The Education – school premises regulations 1999 relating to playing fields require that <ul style="list-style-type: none"> • the minimum area for team games for a school of between 400 and 500 children who have attained the age of 8 is 20,000sqm. 	The 12m2 difference (i.e. between the 26,163m2 and 26,151m2 measurements) is an acceptable and insignificant margin of error. The figure of 4,300m2 for the current buildings includes upper floor rooms and is therefore an incorrect measure, as only the buildings footprint should be subtracted. A MUGA is proposed. The LA proposals will provide in area terms; a total site area in excess of 32,000m2 (this includes the removal of 200m2 for the proposed children's centre); remote playing fields subject to executive approval, and counts the MUGA area twice as allowed for a confined site; a total building ground floor foot print no greater than 4,500m2, leaving net site area of approximately 28,400m2 which will be several hundred m2 over the minimum site requirements for a 4FE school.
	The LA has used the incorrect site area of 26,163sqm in all of its calculations for WIS and WJS. The LA has not deducted the 2,000sqm of school playing field which has been designated by the LA to build a Children's Centre. This area has been fenced off and has been unavailable to the school since the start of term in September 2010. In addition, the most recent net capacity surveys for WIS and WJS give the site as 26,151sqm, not 26,163sqm.	

Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

	For a 3fe junior school and 3fe infant school with a nursery BB99 requires a total site size of 24,560sqm. Using the reduced site size of 24,151sqm the Whitehall schools site is already a 'Confined site' lacking enough play space under BB99 guidelines. In addition, after subtracting the 4,300sqm of all current buildings the site is less than 20,000 which is the minimum required by the school premises 1999 regulations.	
	For a 3fe junior school and 3fe infant school with a nursery BB99 requires a total site size of 24,560sqm. Using the reduced site size of 24,151sqm the Whitehall schools site is already a 'Confined site' lacking enough play space under BB99 guidelines. In addition, after subtracting the 4,300sqm of all current buildings the site is less than 20,000 which is the minimum required by the school premises 1999 regulations.	
	BB99 guidelines recommend a total site area of 30,160sqm for a 4fe school with a nursery, which is 20% more than the current site. The only way the LA can comply with regulations is by providing 2x1,000sqm MUGAs which will take up over half of the field area leaving very little grassed area for the school or community.	
2.17	Replacement of existing equipment / facilities:	
	The LA has assured the schools on several occasions that it will relocate and / or replace any displaced equipment and facilities which result from the expansion, however there have been no discussions on what has to be replaced and how this will be achieved.	This point is acknowledged and where the equipment is relocated does need to be resolved as the proposals progress.

Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

	Amongst the equipment that needs relocating are the assault course in WJS, the assault trail in WIS, the 'wagon' and other equipment in WIS playground. There are also numerous trees that will need to be replaced, the grove wildlife area relocated and the mound moved to make way for the MUGA. There is also the matter of the loss of 3-4 car parking spaces.	All of these requirements may or may not need to be relocated but do need to be addressed as the proposals progress, including the issue of parking spaces.
	The Whitehall site is already a 'confined' site (BB99 guidelines) and with all of the additional buildings and the MUGA which will occupy half of the existing field there will be major problems in finding areas to make good on the LA promises.	This point is addressed in section 2.16
2.18	Kitchen and dining facilities:	
	At the moment the Infant meals are prepared in the Junior Kitchen. The kitchen is currently inadequate and WJS has secured a grant to upgrade the kitchen however this project is on hold pending the result of the expansion proposals.	For these facilities, the LA proposals would meet the requirements for 4FE provision. The decision on the proposals will be taken at this meeting, although the governing bodies do have the right of appeal which could prolong the timescale.
	The LA is proposing to replace the existing kitchen which currently serves both the Infant and Junior School. To only service the Junior School and comply with regulations the replacement kitchen would need to be approximately 70sqm, which would take up additional play space and car parking bays. To serve the Junior and Infant Schools the kitchen would need to be a minimum of 84sqm, taking up even more play space and parking bays.	This point is acknowledged. Kitchen facilities of an appropriate size are included within the proposals.
	Because of the space requirements for new kitchens the Junior School may restrict the size of a new kitchen and refuse to prepare meals for WIS. This would mean that WIS would then require its own kitchen, requiring additional space and works by the LA. This has not been considered by the LA.	If the LA proposals are not approved, and WJS were not to provide pupils at WIS access to hot meals, this does not mean the LA would be required to provide WIS with a kitchen. There are other options that would be considered.

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2.19	Lack of sufficient capital funding.	
	<p>The Department for Education Guide on Expanding a Maintained mainstream school states in paragraph 4.57, 4.59. that land and funding needs to be in place for proposals to be approved.</p>	
	<p>The LA has yet to identify where the funds to expand the schools is going to be found. The £73m figure reported is for school expansions are for Phase 1 and Phase 2 expansion projects. Currently £6.26 million over 3 years is allocated for phase 1 and £66.85m allocated for phase 2 (for expansion of schools by a further 19fe throughout the borough to be available in 2012). These costs were most recently reported to Cabinet in July 2010 and no changes were noted as part of the revenue and capital budget monitoring at the Cabinet meeting in September 2010.</p>	<p>These are Local Authority proposals and the Local Authority has confirmed that it will fund the schemes. More detail on the funding arrangements is given in the Finance sections of the main Cabinet report. Many authorities are facing increased requirements for school places due to increase in birth rates and the government is yet to advise on revised capital allocations, though additional allocations are expected in respect of sufficiency issues. Funding will come from a variety of sources, namely the Primary Capital Programme, but also potentially Section 106 funding held by the authority and any capital receipts. Essentially, PCP will not be the only funding source for these expansions. Other capital funds will need to be applied to these projects based on existing PCP allocations.</p>
	<p>The estimated costs of capital works required at the 7 schools in phase 1 as reported in the statutory proposals is £13.2m. This is over twice the budgeted figure. These proposals should not go ahead as funding for the projects has not been adequately identified as required by the Department for Education Guidance.</p>	
2.20	Lack of forward planning:	
	<p>The Department for Education Guide on Expanding a Maintained mainstream school states in paragraph 8 that:- "Currently, LAs must publish a Children and Young People's Plan (CYPP) as the single strategic overarching plan for all services affecting children and young people which also includes reference to</p>	<p>The current CYPP is a three year plan (2008-11). It was a statutory requirement to update the plans every three years; however this requirement has now been repealed by the government. Officers are in discussion with Council members on the possible production of a new plan or something similar.</p>

Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

	strategic planning for school places."	
	<p>The only reference to school places in the Hillingdon CYPP published in 2008 is on page 6, stating:</p> <ul style="list-style-type: none"> • 'A review of future projected demand for childcare indicated there are enough places overall but across all the age ranges there are shortages of places in Ickenham, Charville, Yeading and Pinkwell wards. There is a lack of childcare places for children of the age of 5-11 across the borough. This will become more apparent over the next three years as the population increases. There is likely to be a growing need for baby places across the borough given that the birth rate is above the national average.' 	<p>The CYPP is an overarching strategic document which outlines the strategic priorities. The operational detail is produced by individual teams more regularly. While the overarching plan has not been updated, the annual action plans have been refreshed to ensure development in service delivery. The reference made by the Governing Bodies only reflects the situation at the time the document was produced up to early 2008. Several school places reports have been produced since then, which have all identified the more widespread need for primary school places. These reports are routinely incorporated into service delivery plans.</p>
	<p>In the year before the plan was produced (2007/08) births in LBH increased significantly and have stayed at the higher level since. There was no mention of this in the CYPP and there has been no update of the plan to accommodate this increase. There have been significant housing developments in schools planning area 6 in the past 3-4 years however (as far as we are aware) until very recently the LA has carried out very little planning to accommodate the additional children.</p>	<p>This is incorrect. The surge in births in 2008 (400+ more children than the previous year) was not evident in PCT data in 2008 as it was occurring, and in fact was only confirmed by official ONS data in spring 2009. And at that point in time (spring 2009) the borough was also experiencing a sharp increase in net migration - a separate but equally important factor. The planning of school places is assessed every year as new data emerges, and plans are made accordingly. Housing developments are routinely included in local forecasts and in official forecasts produced by the GLA. Plans to accommodate new housing and rising births are (and have been) made several years in advance. Locally (in Uxbridge) the forward planning of places expected that the delivery of a 3-form entry school would provide sufficient places. This size of school would provide approximately 50% more places than the child-yield from the RAF Uxbridge site. However since mid-2009 there have been fundamental changes in circumstances across Hillingdon, with much higher births and sudden reversals in net migration trends. The problem of increasing net migration means school places are needed much earlier than previous expectations. This factor was</p>

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		picked up at the earliest possible time, and plans have been made accordingly. The proposals presented here to Cabinet are Phase 1 of the council's programme to deal with this rising demand (including from new housing).
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Table 3: Specific points made by the joint Governing Bodies of Whitehall Infant and Junior Schools or expressed at the Petition Hearing on November 8th 2010.

Appendix 2 - Reference to research on school size & standards

"THE STRUCTURE OF PRIMARY EDUCATION: England and other countries"

by Anna Riggall and Caroline Sharp (National Foundation for Educational Research, Copyright © University of Cambridge 2008).

6.2 The impact of school size on attainment

There is relatively little research evidence on the impact of school size on learning and teaching. One fairly recent study which considered the performance of pupils in schools with different characteristics (Spielhofer et al. 2002) found no evidence of a relationship between primary school size and pupil progress in Key Stage assessments, although this may have been influenced by the relatively small number of primary schools included in the analysis. In New Zealand, Harker (2005) conducted a similar study, examining the relationship between school size and pupil attainment. The author points out that most New Zealand primary schools would be considered 'small to medium' by international standards. The study found no evidence of a significant relationship between school size and academic attainment in primary schools.

Two other qualitative research studies have considered aspects of (large) primary school size and school amalgamation in England. Southworth and Weindling (2002) researched the views of school leaders on the benefits and limitations of large primary schools (those with over 400 pupils). They found that headteachers of large primary schools held mostly positive views of the impact of large schools on teaching and learning. Wallace and Pocklington (2002) studied the process of school amalgamation in two local authorities, documenting the complexity of the process for local authority and school staff and identifying the main change management processes and themes involved.

6.3 However, one of the issues addressed in a report of TIMSS [*Trends in International Mathematics and Science Study*] data by Martin et al. (2000) was the effect of school size on achievement (where schools were categorised as 'large' if bigger than the national average in that country). The report states: 'There seems to be a general tendency for greater percentages of students in high-achieving schools to be in the larger schools in each country.' (p. 47).

7.3 Two aspects of school structure have attracted more evaluative consideration in England and elsewhere: school size and starting age. The available evidence suggests that neither of these has a strong impact on children's attainment or progress at school.

SOURCE

http://www.nfer.ac.uk/nfer/publications/PRO01/PRO01_home.cfm?publicationID=307&title=The%20structure%20of%20primary%20education:%20England%20and%20other%20countries

Appendix 3 - Hillingdon Births

HILLINGDON WARD BIRTHS BY SCHOOL YEAR											
<small>(data source: Office for National Statistics school term births spring, summer, autumn)</small>											
	1998/1999	1999/2000	2000/2001	2001/2002	2002/2003	2003/2004	2004/2005	2005/2006	2006/2007	2007/2008	2008/2009
Barnhill	155	194	202	182	189	173	212	246	242	239	257
Botwell	220	210	200	206	209	213	231	231	252	282	300
Brunel	167	135	132	149	142	140	139	142	163	185	173
Cavendish	164	118	153	139	129	121	151	125	135	129	142
Charville	143	157	146	140	166	160	174	192	182	210	189
Eastcote & East Ruislip	107	92	96	124	84	111	85	67	105	109	104
Harefield	100	108	99	100	109	119	109	110	107	128	111
Heathrow Villages	159	160	185	155	174	160	190	216	195	216	208
Hillingdon East	179	150	140	152	164	170	136	161	162	198	195
Ickenham	84	97	85	67	88	94	88	91	101	83	119
Manor Ward	170	154	147	132	151	142	122	144	113	159	159
Northwood	107	103	111	107	105	98	92	111	126	96	99
Northwood Hills	133	117	120	125	124	134	124	120	131	134	148
Pinkwell	221	168	223	178	212	201	208	240	216	281	266
South Ruislip	174	166	132	168	165	176	173	164	161	183	196
Townfield	151	195	162	183	167	204	210	215	234	292	281
Uxbridge North	123	136	132	132	146	133	139	136	124	168	157
Uxbridge South	118	137	152	132	128	142	142	121	136	183	164
West Drayton	173	158	147	153	166	172	166	201	170	213	231
West Ruislip	148	123	120	136	126	137	127	163	136	138	140
Yeading	238	215	214	188	198	224	257	258	277	295	298
Yiewsley	189	180	160	177	165	190	197	208	189	227	242
North of A40	1,187	1,078	1,063	1,098	1,081	1,132	1,071	1,095	1,115	1,159	1,218
South of A40	2,236	2,195	2,195	2,127	2,226	2,282	2,401	2,567	2,542	2,989	2,961
TOTAL BIRTHS	3,423	3,273	3,258	3,225	3,307	3,414	3,472	3,662	3,657	4,148	4,179
UXBRIDGE SCHOOL PLANNING AREA	408	408	416	413	416	415	420	399	423	536	494
<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"> ↓ September 2009 Reception Cohort </div> <div style="text-align: center;"> ↓ September 2012 Reception Cohort </div> </div>											
The record of births alone indicates a further and substantial demand increase to be expected by September 2012 (before the RAF Uxbridge development commences).											