

William Ellis Action Group

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27th November 2006

Schools Organisation Committee,
Room 139,
Legal Services,
Harrow Council,
PO Box 2,
Civic Centre,
Harrow,
HA1 2BR

For attention of **Mr. James Chamberlain**

Dear Mr. Chamberlain,

Re: Krishna-Avanti Primary School, William Ellis Playing Field, Edgware.

I write on behalf of the William Ellis Action Group in connection with the above.

Further to the Statutory Notice published on 19th October 2006 by the I-Foundation we hereby submit objections to the proposed new school at William Ellis Playing Field, Edgware.

The accompanying document details the objections based on the I-Foundation submission to the Schools Organisation Committee. The document challenges the statements and comments made in the I-Foundations submissions and raised questions as to the need for additional schooling within the area.

As you are aware the SOC has to review the I-Foundation submission in light of Harrow Councils UDP policies and the impact a new school will have on the local community. Our objections advance arguments in these areas as well as those detailed above.

It is noted that certain information is absent from the I-Foundation submission and it is therefore not possible to comment on these parts of the submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'L. Halsey'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

L. Halsey

For and on behalf of the William Ellis Action Group.

The William Ellis Action Group hereby submit to the Harrow Schools Organisation Committee (SOC) objections to the proposal by the I-Foundation to build a new primary school on the grounds of the William Ellis playing field at Camrose Avenue, Edgware, as detailed in the Statutory Notice published on the 19th October 2006, the I-Foundation submission to the SOC and the I-Foundation Consultation Paper.

The William Ellis Action Group wish to make clear that they are not opposed to the building of a Hindu faith school within the Borough of Harrow. The Action Group is made up of representatives from various ethnic and religious backgrounds and generally reflects the mixed ethnic population of Harrow Borough.

The objections put forward are based upon the selected location, the consultation process and the impact a new school will have on surrounding schools, the local community and the environment.

Contents

- Invalid Public Notice

- The Consultation Process

- I-Foundation submission under 'Prescribed Information'.

- The current educational needs within the proposed area of the new school.

- School location

- The impact of the new school on the local community

- Community cohesion.

- Consideration of UDP policies

- Appendices

- Maps

Invalid Public Notice

The I-Foundation Statutory Notice published in the Harrow Times on 19th October 2006 is in breach of the 'School Organisation Public and Parents Guide' section 14 (Publication) and the 'School Organisation: Making Changes (Mainstream)' Step 5 (Publication) item 34. Both documents refer to 'the date' by which letters should be sent to the relevant LA or SOC. No date by which letters should be submitted is given in the Statutory Notice, only a period of time. As such the Notice is not in compliance with either publication and is therefore invalid. In the circumstances the submission to the SOC cannot be considered until a proper Statutory Notice with stated date for closure is published.

The Consultation Process

It is a requirement that a period of consultation must take place with all interested parties and groups prior to publishing a proposal. This is the first stage of the overall process in making changes to educational provision including the building of a new school. The process and those to whom it should be addressed are detailed in 'Guidance on Statutory Proposals for Decision Makers' and the Department for Education and Skills (DfES) document, 'Schools Organisation Public and Parents Guide'.

The objection relates to the public consultation with the residents and people of Edgware.

Background

The original site identified by the I-Foundation, and supported by Harrow Council, was at Pinner Park Farm in the north of the borough. This was a green field site within the green belt. The consultation process took place between 5th May and 15th June 2006. This included three full presentations to the local community and other interested parties. The presentations took the form of 'Powerpoint' presentations, story boards and in depth discussion on the new proposal and how it would affect the local community. The process of public consultation took place over a fifteen day period with meetings being held in three different locations in and around Pinner.

The I-Foundation and Harrow Council withdrew the plan to use the Pinner Park Farm site in the face of local opposition and 'site sensitive' issues. The use of green belt land was stated as an obstacle.

The I-Foundation were then directed to the William Ellis playing field site by Harrow Council who have recently purchased the land from Camden Council.

'Consultation' process in Edgware

The consultation process in Edgware, and the way it is presented in the submission, gives the impression that all local interested parties were consulted as to the proposal. This is not borne out by what actually happened. A significant interested party, the local community and residents, were not made aware of the proposal and the following parts of the submission are challenged.

Page two of 'Prescribed Information' (see Appendix A) states the consultation period for the William Ellis proposal began on 8th September 2006 and closed on 13th October 2006, a period of approximately five weeks. Originally the consultation period was due to end on 29th September with public exhibitions taking place on the 20th and 23rd of September at the very end of the consultation period. This would have left almost no time for public submissions or comment on the proposal. The closure date for the consultation was extended to 13th October following pressure from local councillors who felt there was a lack of awareness and information in the public domain. However the extension of time was not advertised and the residents and local community were unaware of the new date. As such the extension was of no benefit to those wishing to comment or make a formal submission as to the proposal.

The I-Foundation submission annexe A, page 3, Overview of Consultation Process, (Appendix B) states, 'a number of public exhibitions were held by I-Foundation from 20th September to 23rd September'. This infers that there was a high level of opportunity for the public to attend and gain information. This is misleading. In reality only two exhibitions were held, one on 20th September and one on the 23rd September. These were not advertised by the I-Foundation or Harrow Council to the local community, a fact borne out by the low level of visitors declared in the submission. Of the two exhibitions one was held on a week-day afternoon, Wednesday 20th September, when most people are at work. It is claimed 40 people attended. In effect there was only one exhibition available to the public at a time when most people would have been able to attend. The I-Foundation claim 75 people attended the exhibition on Saturday 23rd September. The William Ellis Action Group challenges these figures as there is no evidence to support the claim on attendance. Whatever the true figures it was very poorly attended and the lack of attendance supports the argument that the consultation process was not properly advertised to the local residents and community of Edgware.

The exhibitions took the form of four story boards containing minimal detail. Those attending on behalf of the I-Foundation had little information to impart and were not fully conversant with the proposals. This lack of understanding was graphically demonstrated when a statement was made that a two form entry school would be built but one form entry would be admitted to begin with, this would change to two form entry at a later date. The I-Foundation have publicly stated a two form entry school is not being planned although this

is contradicted in responses to questions raised on the Consultation slips (this is referred to later in this submission).

The exhibition at St Anthony's Catholic Church closed early. The statement that the exhibition at St Anthony's was open and staffed during the times stated is untrue and therefore misleading.

The I-Foundation states that on the 8th September it had sent papers to '.....various different organisations and individuals including residence associations of Harrow,' (see Appendix C). Clearly these did not reach the local residents in the surrounding area of the proposed site. Residents are not mentioned in the list of parties included in the mass mail shot. Again this represents a misleading declaration and creates an impression of mass information when in fact a very large interested and affected group were excluded. It should be mentioned that the Harrow Observer is distributed on the opposite of the Borough to the proposed site and therefore was not available to those residents in the affected area. The Harrow Times distribution in and around Edgware is poor with many residents not receiving the paper at all.

Clearly there was a huge difference between the **consultation** in Pinner and the **exhibitions** at Edgware. In this respect it cannot be said that a proper consultation process has been undertaken in Edgware. This is further supported by the complaint from Stag Lane School that the period allowed for a response, six days, did not allow sufficient time to consult with Governors, staff, parents and other interested parties.

At no time has the I-Foundation sought to engage with the local community in any form of public discussion or debate, this in spite of its commitment to 'vigorously' consult with local people. It is clear that the people of Edgware have been treated differently to those of Pinner and as such must be seen as not as deserving of the consultation process. The I-Foundation has offered no explanation as to why the two communities have been treated so differently.

The Consultation Paper under item 2.2, 'Community Cohesion', states that the 'I-Foundation has gone to great lengths to ensure that the School does not stand isolated from the local community'. The failure of the I-Foundation to consult in a right and proper manner with the local community at all levels calls into question the 'great lengths' it has gone to. There is no evidence to support this statement.

It is the contention of the William Ellis Action Group that the I-Foundation has failed to properly consult with the people and schools of Edgware as set out in the DfES guidance and therefore is in breach of its statutory obligation in relation to this application.

I-Foundation submission under 'Prescribed Information' - inclusive of the Statutory Notice dated 16th October 2006 and attachments (Appendix D)

The I-Foundations Executive Summary of the Consultation Paper:

- 1) This states that the I-Foundation has been chosen 'because of its truly broad representation of the Hindu community'. In addition, under 'What are the objectives of the proposal' on page two of the 'Prescribed Information' submission, the I-Foundations claims the proposal has the support of 'all major Hindu umbrella organisations'. This gives the impression that the I-Foundation is representative of the broader Hindu community. This is not a fact. The Hindu religion is made up many sects of which the I-Foundation represents ISKCON, one sect within the overall faith. As such, teaching at the new school would be formulated to the ISKCON philosophy and ethos. This would not necessarily be an approach to which other Hindu sects would subscribe and therefore will limit the level of applications to one sect from within the overall Hindu community.
- 2) The I-Foundation states 'I-Foundation's team has extensive experience in establishing and operating Hindu faith schools in the UK'. From the information submitted it states the I-Foundation has experience of establishing and operating two private faith schools. Clearly these two statements are incompatible. The first would lead to a belief that the organisation has extensive experience when in fact this is not the case. This statement is misleading and creates the wrong impression as to the I-Foundations credentials. The fact is the I-Foundation has no experience of setting up or organising a Voluntary Aided school.
- 3) In Part 9a, the I-Foundation states that the schools objective is to promote inclusiveness and partnership. This includes community cohesion and the environment. It must be stated that as a direct result of the lack of consultation and the nature of the proposed project, i.e. to build on green field land, both of these objectives are unachievable. Community cohesion is in a very fragile state as a result of the I-Foundation proposal, a point made by a member of the local Hindu community at a recent public meeting called by Harrow Council. In addition the plan to build on green field land and its impact on the environment has met with a very hostile response from across the whole of the local community irrespective of ethnicity or background. As such these 'values' cannot be considered.
- 4) Under the heading 'Environment' the I-Foundation commits itself to the ideal of helping to improve and maintain certain aspects of the environment. The plan to build on a green field site is a direct contradiction of these values. The proposal to remove valuable green land brings no benefits, as confirmed by the Leader of Harrow Council who was unable to respond to the question, 'What are the benefits of building on green land', when posed at a public meeting. In fact the

proposal only serves to further reduce people's quality of life and bring tensions into a stable and cohesive community. As the commitments stated in this document do not bear out the reality it is invalid and cannot be accepted. The I-Foundation appear to be saying one thing and doing another.

- 5) Annexe A, page 4, states that 500 people of the Hindus faith living in the Harrow were surveyed and that results reflected a strong demand for a Hindu school. Given the population of Harrow has a Hindu community of some 40,000 the number of people surveyed represents only 1.25% of the population and cannot be claimed to be representative of the community as a whole. The fact the I-Foundation represents ISKCON, one sect within the general Hindu community, further diminishes any claim it represents the wider Hindu community within Harrow.
- 6) Annexe C. Key information with respect to details of school numbers in the borough of Harrow are not give by the I-Foundation, see Appendix E, attached. In the absence of this information it must be assumed it has not been submitted. In the circumstances it is not possible to evaluate the submission in its full context and therefore the submission must be withdrawn. Should these details become available at some point in the future then a new submission must be made with a revised Statutory Notice period for consideration by those affected.
- 7) It is noted, under Item 19, that the submission states that 3553 primary school children are of the Hindu faith. This is a straight extrapolation based on a percentage of the total primary school population in Harrow related to the overall percentage of Hindu people living in the Borough. As such this figure cannot be accepted as a true representation of the number of Hindu primary school children. Furthermore, given ISKCON represents only one element within the overall faith the figure is not truly representative. In these circumstances it is misleading and cannot be accepted as factual.
- 8) Concerning the Annexe A cover sheet of the submission. This lists 'Consultation Exhibition Slides' as part of the enclosed documents. These are missing from the documentation as there were no slides at the exhibitions in Edgware, only minimal information displayed on story boards. This further underpins the case concerning the lack of information to the local community.
- 9) With reference to Annex A item 3, Consultation Documentation – Outcomes (pages 5 - 8). This states there was mixed feedback received via consultation reply slips. Given the very low attendance at the exhibitions how many reply slips were received from the residence of Edgware? Were the reply slips from all sources including the first suggested site at Pinner? With reference to the responses by the I-Foundation to these enquiries the following observations are made:-

- a) It is stated that the I-Foundation investigated various sites within Harrow. Despite repeated requests for a list of these alternative sites to be made public both the I-Foundation and Harrow Council have refused to issue the information. In these circumstances it must be concluded that no such search was made and therefore this statement is misleading.
- b) The initial enquiry to commercial agencies for sites was conducted in September 2005. Given the search lasted only one month it appears insufficient time was allocated to find a suitable site. Clearly when looking for such a large site more time should have been allowed given the project being undertaken.
- c) The plan to site the school at Pinner collapsed in June/July 2006. In September 2006 Harrow Council proposed William Ellis playing field. Given the assurances by Harrow Council that alternative sites were considered, although there is no evidence to support this claim as no information has been put in the public domain, why did the I-Foundation not re-engage commercial agencies to find a suitable alternative location in September 2006? Some twelve months had elapsed since the original enquiry and other sites may have become available.
- d) To date there has been no indication that the I-Foundation has conducted or published the 'Green Travel Plan' referred to.
- e) On the question of form level entry the Statutory Notice details a single form entry. In response to a Consultation reply slip the following answer is given, 'The school will be established as a one-form entry mixed primary school with attached nursery and with the future possibility of expansion to a two form entry. The school will be built with a two form entry common infrastructure'. It would appear the school intends to change to a two form entry at a later date (subject to approval). However this fact is not included in the Statutory Notice which gives a misleading impression as to the proposal and future intent to expand the school. There is conflicting information coming from the I-Foundation on this point and it would appear different parties are being given different information.
- f) The I-Foundation recognises that building a school on the William Ellis site will have an adverse impact on surrounding schools but emphasises the issue of parental choice. The total intake when fully occupied will be 240 children as a one form entry school (possibly 480 in the longer term). Given the children would have been accommodated in other local schools the impact on those schools will be severe. The location of the new school will drive the decline in other local schools and may possibly result in their closure. A different location within the Borough would have less of an impact and help to sustain the existing school structure for the non-Hindu population.

There is a risk with this proposal that the vast majority of children, non-Hindu and non ISKCON followers, may suffer the loss of a local school if the new school is built at William Ellis.

- 10) Annex B. Information related to schools located in Harrow within a two mile radius has not been included in the submission. As such it is not possible to comment or form a judgement on this part of the submission. It must be concluded that the submission is incomplete and therefore cannot be considered. However the Harrow Schools Organisation Plan, 2003 – 2006, details falling school numbers with under subscribed schools and surplus places being well in excess of the 10% recommended. There is special reference to the South East, clause 3.9, which identifies surplus places at between 15% and 22% and recommends a significant change to Standard Numbers to overcome the problem.

The Current educational needs within the proposed area of the new school.

Currently there are three schools offering primary education within the surrounding area of the proposed site. These are Little Stanmore, Stag Lane and Edgware School, in the borough of Barnet. In addition Glebe School is a short distance away. These schools have reported declining numbers of pupils and surplus places and recently Glebe School came under threat of closure. Stage Lane school has recently been reduced from a three form entry to a two form entry. Across the borough school numbers are declining and schools are reporting surplus places, notwithstanding the requirement for a 10% excess of places to allow for possible fluctuations in school numbers. All as detailed in the Harrow Schools Organisation Plan, 2003 – 2006.

As such there is no absolute need for additional educational facilities within either the Borough or the ward of Edgware at First School level.

Currently children of the Hindu faith are catered for within the existing schools structure, however, the issue of parental choice is raised. In this respect the I-Foundation proposal will only serve that part of the community that subscribes to the ISKCON sect of the faith. In these circumstances a large part of the Hindu community will still have no choice but to use the existing arrangements. This arrangement benefits very few children and as such it is questionable as to its effectiveness in responding to the need of the Hindu community as a whole.

In addition the proposal to build a new school is not supported by the existing schools in the surrounding area.

The introduction of a new school with a population of 240 children into the existing cluster of local primary schools will have a huge impact. The declared catchment area is within a one mile radius of the proposed site. With this arrangement existing local schools will see a gradual decline in intake over the coming years that may well lead to their closure as the effects of the decline wash through the system.

School location

The proposed school will be located in the south east corner of the Borough, see attached map 1. In this location, and with a declared catchment area of one mile a large proportion of the catchment area falls outside the Borough boundaries, see attached map 2. With such a large proportion of the catchment area falling outside the Borough it is questionable as to how many Harrow primary school children and residents will benefit from the school. If the intention is to just take children from Harrow then clearly the distances they travel and the ripple effect on other schools intake will be much greater than implied in the submission.

Clearly from a geographical standpoint the location is poor as a large section of the Hindu population within Harrow live too far from the school to have the opportunity to apply. This coupled with the close proximity of the existing primary schools cluster makes the whole proposal questionable. To attain the maximum benefit from the new school it should be located in a more central position within the Borough. This would create a wider catchment area within the Borough boundaries and create better opportunities for the wider Hindu community to apply to the school. In addition the new location should seek to minimise the impact of a new school relative to the existing surrounding primary schools. From a schools planning standpoint this must be a better alternative to that proposed.

Given the proposed location the travel arrangements to the school must be questioned. In its submission the I-Foundation refer to a Green Travel Plan. As this has yet to be published it is impossible to comment but what can be said is that there are no effective 'walking buses' within the Borough and that the vast majority of primary school children arrive and are collect by car.

The I-Foundation has made clear it thinks the school will be over subscribed. In the circumstances Hindu children may well find themselves unable to qualify for admission because they live too far away from the school on the wrong side of the Borough. The proposed location clearly does not serve those residents well. A more central location will give all those who would like to send their children to a Hindu school from across the Borough a fairer chance.

The impact of the new school on the local community

Any new school, especially one on a green field site, is going to have a huge impact on the local environment, area and residents. Needless to say this proposal is hugely controversial as it seeks to build on green land depriving a local youth football club and local children of the benefit of a large recreational area. There is no way of minimising the impact of this development on the community. Once built on green land is impossible to replace.

This particular area of the Borough already has a shortage of green space compared to other wards and areas, so the plan to build in this location will have a serve impact on the local environment and community. The attendant

issues of loss of green land, noise, pollution and traffic only serves to compound matters. Refer to Harrow UDP and central government policies on these issues.

Notwithstanding the environmental issues the ramping up of the number of children attending the school will have severe implications for surrounding schools. The ability to manage the educational process in terms of stable funding, higher educational attainment and staff stability are vital to a successful school. These key aspects will be undermined with any decline in school numbers especially in an area of high under subscription. The potential closure of a local community school will have a huge impact on the local residents and those who use the school facilities. The proposed new school would 'engineer in' this decline with its resultant adverse affects for the community at large.

Community cohesion.

Within the neighbourhood encompassed by the proposed school we have enjoyed a high level of community cohesion and harmony. This has grown as the area has taken on a more diverse composition. Tolerance and understanding have grown to be a foundation stone of the harmonious community in which we live. However the introduction of a new school in such controversial circumstances is leading to tension and strain within the community. This cannot be ignored by the SOC who have to take recognition of the impact such a dramatic imposition will have. This applies to all those affected, the local community, the school organisation, including pupils, teachers and staff, as well as all other groups affected by the change. The SOC must take recognition of these factors as it assess the overall short and long term implications of such a scheme.

It is the feeling of a large section of the community that cohesion will be severely damaged if this proposal is pushed through against the wishes of the vast majority of the local residents and community at large.

It has to be recognised that Belmont Football Club play a vital social role within the community. The club bring together young children from all social and religious backgrounds as well as providing playing and training opportunities to those children from deprived areas and disadvantaged backgrounds. This is a vital role within the framework of social cohesion and community tolerance. The loss of 50% of the playing area will mean a huge reduction in the key role the club play within the community. The resultant change can only mean the community is deprived of a valuable asset. This can only be to the detriment of young people and the community at large.

Consideration of UDP policies

The SOC is obliged to take into account Harrow's UDP as part of the evaluation process.

This proposal contradicts all of Harrow Council's declared UDP policies with respect to environmental protection, building on green field land, protection and preservation of recreational land, use of previously developed land, encouraging a healthy lifestyle, air quality, etc.,.

In suggesting and supporting the William Ellis site Harrow Council have ignored their own UDP policies and those stated policies and objectives of central government in matters of the environment and preservation of recreational and green land. On these grounds alone the scheme before the SOC should be rejected.

It is the contention of the William Ellis Action Group that a suitable brown field site can be found for the school within the Borough. It would appear from the submission that this possibility has not been fully explored and that the I-Foundation are only considering green field sites, in contradiction of their own ethos and philosophy, as well as Harrow's UDP and government policies. This combined with the impact on local schools within the area makes the choice of William Ellis Playing Fields a poor one. All of the issues can be addressed with the choice of an alternative site better positioned to serve the need of the Hindu community within Harrow.

Final summary

In summary the objections of the William Ellis Action Group are put forward on the following grounds:

- 1) There is no closure date stated in the Statutory Notice published on 19th October 2006 in contravention of requirements of the 'School Organisation Public and Parents Guide' section 14 (Publication) and the 'School Organisation: Making Changes (Mainstream)' under Step 5, (Publication) item 34.
- 2) The public consultation process in Edgware was not advertised to a major interested party, i.e. the local community and public.
- 3) The two consultation exhibitions in Edgware were over too short a period (three days) and did not contain sufficient information for people to form an objective view of what was being proposed.
- 4) Incorrect and conflicting information was given at the public exhibitions.
- 5) The people of Edgware were not treated in the same manner as those in Pinner when it came to consultation with the general public. This has resulted in public anger at not being given the same level of information as the people of Pinner.
- 6) Information contained in the I-Foundation submission is incomplete. Given these facts it is not possible to provide a complete and fully appraised response by the William Ellis Action Group to the application made to the SOC.
- 7) The current and forecast under subscription to primary educational in the Borough can be managed within the existing school organisational arrangements. In these circumstances there is no absolute requirement for a new primary school.
- 8) The introduction of a new primary school at William Ellis will lead to the decline and possible ultimate closure of an existing local school.
- 9) The limited time for consultation with local schools has not allowed them sufficient time to consult with Governors, staff, parents and the local community.
- 10) The proposed location of the school in the far south east corner of the Borough does not serve the Hindu community properly. A more central location needs to be considered where the school would give a wider choice to a greater section of the Hindu community with the Borough.
- 11) The schools proposed site will mean the loss of green land and have an adverse impact on the whole of the local community including Belmont United Youth Football Club. This is an area of the Borough

where green field land is already limited and space for recreation is being continually depleted.

- 12) Community cohesion will be adversely impacted as a result of the new school. There are real fears within the local community that the school will prove divisive and introduce increased tension into a previously harmonious community. After many years of happy co-existence the imposition of this scheme will introduce an un-necessary intrusion into the community.

The severe reduction of the social role played by Belmont United Youth Football Club will do immense damage to the long term future of community cohesion. The role the club plays in shaping attitudes and the sense of tolerance and understanding within the community cannot and must not be underestimated.

- 13) The proposal takes no recognition of the UDP policies of Harrow or central governments aims to preserve green space and recreational land. It is clear from the information contained within the I-Foundation submission that there has been no effort to find a suitable brown field site. It should be noted that the I-Foundation states it is committed to the environment. There is no sign of that commitment in this proposal.