

Report of the Interim Director of Planning, Regeneration & Public Realm

Address GRANGEWOOD SCHOOL FORE STREET EASTCOTE PINNER

Development: Demolition of existing school building and construction of part one storey, part two storey Special Education Needs and Disability School (SEND) (Use Class F), together with associated landscaping, play space, access, refuse and recycling storage, car and cycle parking and associated works.

LBH Ref Nos: 2145/APP/2022/3534

Drawing Nos: Tree Survey, Arboricultural Impact Assessment and Outline AM€ (November 2022)
FS0728-WWA-ZZ-ZZ-D-L-0705 (Rev. P01)
Transport Statement (November 2022)
2700_P (Rev. D)
Preliminary Ecological Appraisal Update (November 2022)
Planning Statement (November 2022)
Archaeological Desk Based Assessment (November 2022)
Phase 1 Geo-Environmental Desk Study Report (March 2018)
Planning Noise Assessment (November 2022)
Flood Risk Assessment and Drainage Strategy
Fire Safety Strategy (27 October 2022)
FS0728-WWA-ZZ-ZZ-DR-L-0703 (Rev. S4 P07)
FS0728-WWA-ZZ-ZZ-DR-L-0704 (Rev. S4 P06)
FS0728-WWA-ZZ-ZZ-DR-L-0401 (Rev. P01)
FS0728-WWA-ZZ-ZZ-DR-L-0118 (Rev. P01)
FS0728-WWA-ZZ-ZZ-DR-L-0117 (Rev. P01)
FS0728-WWA-ZZ-ZZ-DR-L-0116 (Rev. P02)
FS0728-WWA-ZZ-ZZ-DR-L-0115 (Rev. P01)
FS0728-WWA-ZZ-ZZ-DR-L-0114 (Rev. P02)
FS0728-WWA-ZZ-ZZ-DR-L-0112 (Rev. P06)
FS0728-WWA-ZZ-ZZ-DR-L-0106 (Rev. P02)
FS0728-WWA-ZZ-ZZ-D-L-0706 (Rev. P01)
Travel Plan (November 2022)
FS0728-WWA-ZZ-ZZ-D-L-0702 (Rev. S4 P02)
FS0728-NOV-V2-00-DR-A-PL02 (Rev. P01)
FS0728-NOV-V2-00-DR-A-PL01 (Rev. P01)
FS0728-NOV-01-XX-DR-A-PL12 (Rev. P01)
FS0728-NOV-V1-XX-DR-A-PL11 (Rev. P01)
FS0728-NOV-V1-XX-DR-A-PL10 (Rev. P01)
FS0728-NOV-V1-XX-DR-A-PL09 (Rev. P01)
FS0728-NOV-V1-XX-DR-A-PL08 (Rev. P01)
FS0728-NOV-V1-02-DR-A-PL07 (Rev. P01)
FS0728-NOV-V1-01-DR-A-PL06 (Rev. P01)
FS0728-NOV-V1-00-DR-A-PL05 (Rev. P01)
5017665-RDG-XX-00-PL-ME-8102
5017665-RDG-XX-00-PL-ME-8101
External Lighting Strategy (11-11-22)
Energy Strategy Report (September 2022)
Design and Access Statement (November 2022)
Car Park Management Plan (November 2022)

Biodiversity Net Gain Report (November 2022)
Initial Air Quality Statement (November 2022)
Air Quality Statement (December 2022)
FS0728-WWA-ZZ-ZZ-D-L-0701 (Rev. S4 P02)
Bat Survey Report (November 2022)
Existing Elevations (Sheet 2)
Replacement Fence Specifications
Proposed Replacement Fence Location (with SSSI and SAM overlay
FS0728-WWA-ZZ-ZZ-DR-L-0113 (Rev. P06)
Response on Biodiversity Matters (2145/APP/2022/3534

Date Plans Received:	21/11/2022	Date(s) of Amendment(s):	07/12/2022
Date Application Valid:	23/11/2022		06/01/2023
			25/11/2022

1. SUMMARY

The proposal seeks permission for the demolition of the existing school building and the erection of a larger, part one and part two-storey replacement building, to continue to operate as an SEN School but with improved modern facilities whilst allowing for an uplift in the number of pupils which can attend, with a new maximum occupancy of 180 pupils (an increase of 80).

The built form in the wider area is predominantly characterised by two-storey residential properties, although it is noted that Coteford Infant School is located approximately 5 minutes' walk to the south on Fore Street, and the areas to the north and west are characterised by dense woodland. Most of the undeveloped land within the application site is also woodland, with Ruislip Woods to the north and west of the site (and partially within the site), which is a protected Site of Special Scientific Interest (SSSI), and also includes a Scheduled Ancient Monument (SAM).

The demolition and erection of a replacement school to provide Special Educational Need provision is considered an acceptable use for the site, being a continuation of the existing use, and is wholly supported in principle recognising the significant weight which should be given in favour of additional school places, recognised at a national level through the NPPF and recognising that a larger SEN school is crucial to meeting the council's statutory duty to provide a sufficient number of school places within the borough.

The overall scale and design of the proposal is acceptable and would retain a modest footprint and massing, appearing contextually appropriate for the surrounding natural and built environment and without encroaching on the SSSI or the SAM with the exception of a replacement fence, for which further details would be secured by condition. Additionally, because of its location and distance from the nearest residential properties, any impacts to residential amenity would be low to negligible.

There are numerous trees which would be removed as a result of the proposed development, and there would be harm to bats through the removal of multiple existing bat roosts within the building. It is considered that this harm has been mitigated as best as possible, with further details of this mitigation to be provided and secured through a condition, and the scheme as a whole delivers a biodiversity net gain.

The levels and location of parking around the site is considered acceptable for this site, recognising that SEN schools typically have more staff per pupil than most state schools and the PTAL of the site is relatively low, and therefore there will be some reliance on the private car. Measures to increase sustainable and active travel would be controlled through a Travel Plan to be secured as an obligation, alongside a gradual uplift in active electric vehicle charging points.

Overall, the proposal would comply with development plan policies and is recommended for approval, subject to the conditions and obligations set out in this report.

2. RECOMMENDATION

That delegated powers be given to the Interim Director of Planning, Regeneration and Public Realm to grant planning permission, subject to the following:

A) That the Council enter into a legal agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) or any other legislation to secure the following:

i) A full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include targets for sustainable travel arrangements, effective measures for the ongoing monitoring of the Travel Plan, and a commitment to delivering the Travel Plan objectives. A £20,000 Travel Plan bond is also to be secured;

ii) Details shall be submitted for a Construction and Employment Training scheme in accordance with the Council Planning Obligations SPD with the preference being for an in-kind, on-site scheme to be delivered;

iii) A carbon offsetting sum based on an Updated Energy Strategy to be submitted to discharge condition 8, with the offset calculation based on £95 per tonne of CO2 over a 30 year period.

iv) A financial contribution equal to 5% of the total cash contributions, for Project Monitoring and Management.

B) That in respect of the application for planning permission, the applicant meets the Council's reasonable costs in preparation of the Section 106 Agreement and any abortive work as a result of the agreement not being completed.

C) That officers be authorised to negotiate and agree the detailed terms of the proposed agreement and conditions of approval.

D) That, if the Legal Agreement has not been finalised within 6 months (or such other time frame as may be agreed by the Interim Director of Planning, Regeneration and Public Realm), delegated authority be given to the Interim Director of Planning, Regeneration and Public Realm to refuse planning permission for the following reason:

'The applicant has failed to secure the necessary legal obligations associated with the proposed development and provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of Carbon Offsetting, Travel Planning, Employment Strategy and Construction Training, and Project Management and Monitoring). The scheme therefore conflicts with Policy DF1 of the London Plan (2021), Policy DMCI 7 of the Hillingdon Local Plan Part 2 (2020) and the Planning Obligations

Supplementary Planning Document (2014).'

E) That if the application is approved, the following conditions be imposed:

1 A1 Time Limit

The development hereby approved shall be begun before the expiration of three years from the date of this permission.

REASON

To comply with Section 91 of the Town and Country Planning Act 1990.

2 COM4 Accordance with Approved Plans

The development hereby approved shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers:

2700_P (Rev. D), FS0728-WWA-ZZ-ZZ-DR-L-0703 (Rev. S4 P07), FS0728-WWA-ZZ-ZZ-DR-L-0704 (Rev. S4 P06), FS0728-WWA-ZZ-ZZ-DR-L-0401 (Rev. P01), FS0728-WWA-ZZ-ZZ-DR-L-0118 (Rev. P01), FS0728-WWA-ZZ-ZZ-DR-L-0117 (Rev. P01), FS0728-WWA-ZZ-ZZ-DR-L-0116 (Rev. P02), FS0728-WWA-ZZ-ZZ-DR-L-0115 (Rev. P01), FS0728-WWA-ZZ-ZZ-DR-L-0114 (Rev. P02), FS0728-WWA-ZZ-ZZ-DR-L-0112 (Rev. P06), FS0728-WWA-ZZ-ZZ-DR-L-0106 (Rev. P02), FS0728-WWA-ZZ-ZZ-D-L-0706 (Rev. P01), FS0728-WWA-ZZ-ZZ-D-L-0702 (Rev. S4 P02), FS0728-NOV-V2-00-DR-A-PL02 (Rev. P01), FS0728-NOV-V2-00-DR-A-PL01 (Rev. P01), FS0728-NOV-01-XX-DR-A-PL12 (Rev. P01), FS0728-NOV-V1-XX-DR-A-PL11 (Rev. P01), FS0728-NOV-V1-XX-DR-A-PL10 (Rev. P01), FS0728-NOV-V1-XX-DR-A-PL09 (Rev. P01), FS0728-NOV-V1-XX-DR-A-PL08 (Rev. P01), FS0728-NOV-V1-02-DR-A-PL07 (Rev. P01), FS0728-NOV-V1-01-DR-A-PL06 (Rev. P01), FS0728-NOV-V1-00-DR-A-PL05 (Rev. P01), FS0728-WWA-ZZ-ZZ-D-L-0701 (Rev. S4 P02), FS0728-WWA-ZZ-ZZ-D-L-0705 (Rev. P01), FS0728-WWA-ZZ-ZZ-DR-L-0113 (Rev. P06), 5017665-RDG-XX-00-PL-ME-8102, 5017665-RDG-XX-00-PL-ME-8101, Existing Elevations (Sheet 2) and Proposed Replacement Fence Location (with SSSI and SAM overlay).

And the submitted documents, titled:

Tree Survey, Arboricultural Impact Assessment and Outline AMS (November 2022), Response on Biodiversity Matters (2145/APP/2022/3534), Transport Statement (November 2022), Preliminary Ecological Appraisal Update (November 2022), Planning Statement (November 2022), Archaeological Desk Based Assessment (November 2022), Phase 1 Geo-Environmental Desk Study Report (March 2018), Planning Noise Assessment (November 2022), Flood Risk Assessment and Drainage Strategy, Fire Safety Strategy (27 October 2022), External Lighting Strategy (11-11-22), Design and Access Statement (November 2022), Car Park Management Plan (November 2022), Biodiversity Net Gain Report (November 2022), Initial Air Quality Statement (November 2022), Air Quality Statement (December 2022), Bat Survey Report (November 2022), and Replacement Fence Specifications.

REASON

In the interests of proper planning, and to ensure the approved development complies with the provisions of the London Plan (2021), the Hillingdon Local Plan: Strategic Policies (2012), and the Hillingdon Local Plan: Development Management Policies (2020).

3 OM19 Construction Management Plan (inc. Natural England)

Prior to the commencement of the development hereby approved (including demolition), a Demolition and Construction Logistics Plan (DLP/CLP) and a Demolition and Construction Management Plan (DMP/CMP) shall be submitted to, and approved in writing by, the Local Planning Authority, in consultation with Natural England, to minimise impacts to the local highway network, to control noise, vibration and air pollutants generated as a result of the construction process, and to avoid or mitigate construction impacts on species and habitats, particularly to the adjacent Ruislip Woods Site of Special Scientific Interest (SSSI). These documents shall be prepared in accordance with the London Freight Plan, 'The control of dust and emissions from construction and demolition' Supplementary Planning Guidance, BRE Pollution Control Guides 'Controlling particles and noise pollution from construction sites' and 'Controlling particles, vapour and noise pollution from construction sites'.

The DLP/CLP and DMP/CMP shall include details of (but shall not necessarily be limited to):

- (a) loading and unloading of plant and materials;
- (b) storage of equipment, plant, materials and chemicals;
- (c) programme of works;
- (d) measures for traffic management and encouragement of sustainable modes of transport for workers, including prohibition of construction vehicles parking on the local highway network within the vicinity of the application site;
- (e) details of a vehicle booking system, ensuring construction deliveries are received outside peak hours;
- (f) provision of boundary hoarding and visibility zones of construction traffic routing;
- (g) hours of construction;
- (h) means to prevent deposition of mud on the highway;
- (i) likely noise levels to be generated from plant and construction works;
- (j) a dust risk assessment;
- (k) means to monitor and control dust, noise and vibrations, following the published guidance by The Institute of Air Quality Management (IAQM) on how to assess impacts of emissions of dust from demolition and construction sites.
- (l) use of a banksman (if applicable)
- (m) haulage routes;
- (n) a site plan identifying location of site entrance, exit, wheel washing, hard standing hoarding (distinguishing between solid hoarding and other barriers such as heras and monarflex sheeting), stock piles, dust suppression, location of water supplies and location of nearest neighbouring receptors;
- (o) bonfire policy;
- (p) confirmation that a mobile crusher will/won't be used on site and if so, a copy of the permit and intended dates of operation;
- (q) confirmation of all Non-Road Mobile Machinery (NRMM) to be used, or a statement confirming that NRMM will not be used. All Non-Road Mobile Machinery (NRMM) and plant to be used on site of net power between 37kW and 560 kW shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" and must be registered at <http://nrmm.london/>;
- (r) details of any closures of public routes and diversions, demonstrating how time spent closed to the public has been minimised;
- (s) the arrangement for monitoring and responding to complaints relating to demolition and construction;
- (t) details of cranes and other tall construction equipment (including the details of obstacle lighting);

- (u) all Heavy Goods Vehicles shall comply with the Direct Vision Standard. A rating of 3 stars (or more) will be required;
- (v) all deliveries to the site, particularly Heavy Goods Vehicles, shall be made using vehicles which have a Class VI mirror fitted in accordance with EU directive 2007/38/EC;
- (w) the precautions set out to eliminate or reduce noise levels where the operational risk levels illustrated within The Control of Noise at Work Regulations 2005 could be exceeded;
- (x) the provision of secured restricted access as the sole means of entry to site for cyclist along with secured turnstile entrance for pedestrians;
- (y) chemical and/or fuel run-off from construction into nearby watercourse(s); and
- (z) measures to ensure no materials, machinery, vehicles or works will encroach on the adjacent Site of Special Scientific Interest (SSSI).

The development hereby approved shall be implemented in accordance with the approved DLP/CLP and DMP/CMP.

REASON

To ensure that the proposed development does not interfere with the free flow of traffic and conditions of safety on the public highway, to ensure the development process does not have a significant adverse impact on the amenities of nearby residential properties and to protect features of biodiversity value, in accordance with Policies DMT 1, DMT 2, DMEI 7 and DMEI 14 of the Hillingdon Local Plan: Development Management Policies (2020) and Policies D14, SI 1, T4, T7, G5 and G7 of the London Plan (2021). Also, to ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Development Management Policies (2020).

4 NONSC Archaeology - WSI

(A) Prior to the commencement of the development hereby approved (including demolition), a Stage 1 Written Scheme of Investigation (WSI) shall be submitted to, and approved in writing by the local planning authority, in consultation with the Greater London Archaeological Advisory Service (GLAAS). For land included within the WSI, no demolition of development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent persons(s) or organisation to undertake the agreed works.

(B) If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted and approved in writing by the local planning authority, in consultation with GLAAS. For land included within the stage 2 WSI, no demolition of development shall take place other than in accordance with the agreed stage 2 WSI, which shall include:

- (i) The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person or organisation to undertake the agreed works.
- (ii) Where appropriate, details of a programme for delivering related positive benefits.
- (iii) The programme for post-investigation assessment and subsequent analysis, publication, dissemination and deposition of resulting material.

REASON

To protect assets of archaeological interest in accordance with Policy HC1 of the London Plan (2021) and Policies DMHB 1 and DMHB 7 of the Hillingdon Local Plan Part 2 (2020).

5 NONSC Archaeology - SAM and Replacement Fence

Prior to the removal of the existing boundary fence, full details (including scale drawings, specifications and manufacturers' details where relevant) of all parts of the fence which overlap with the Park Pale Scheduled Ancient Monument shall be submitted to, and approved in writing by, the local planning authority, in consultation with Historic England and the Greater London Archaeological Advisory Service (GLAAS). This shall include confirmation that only existing post holes shall be used for the replacement fence and that no new post holes will be made, or any other disturbance caused to the Park Pale Scheduled Ancient Monument during erection of the replacement fence.

REASON

To ensure the replacement fence does not harm the Scheduled Ancient Monument on site, and to protect assets with heritage value, in accordance with Policy HC1 of the London Plan (2021) and Policies DMHB 1 and DMHB 7 of the Hillingdon Local Plan Part 2 (2020).

6 COM26 Bats

Prior to demolition of any building, structure or tree that contains (or is suspected to contain) a bat roost, full details of bat mitigation requirements shall be submitted to and approved in writing by, the local planning authority. These measures, as part of the wider development, must be carried out in accordance with the bat licence issued by Natural England (to be issued subsequent to this planning permission).

REASON

To ensure the protection of bats in accordance with Policy G6 and G7 of the London Plan (2021) and Policy EM7 and DMEI 7 of the Hillingdon Local Plan Parts 1 (2012) and 2 (2020).

7 COM30 Contaminated Land

(i) Prior to the commencement of the development hereby approved (excluding demolition), a scheme to deal with contamination shall be submitted to and approved in writing by the Local Planning Authority (LPA). All works which form part of any required remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include the following measures:

a) A site investigation, including where relevant soil, soil gas, surface water and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and

(b) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement, along with the details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

(ii) If during remedial or development works contamination not addressed in the submitted remediation scheme is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

(iii) Upon completion of the approved remedial works, this condition will not be discharged

until a comprehensive verification report has been submitted to and approved in writing by the LPA. The report shall include the details of the final remediation works and their verification to show that the works have been carried out in full and in accordance with the approved methodology.

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping and/or engineering purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the factual results and interpretive reports of this testing shall be submitted to and approved in writing by the Local Planning Authority.

REASON

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policies DMEI 11 and DMEI 12 the Hillingdon Local Plan Part 2 (2020).

8 SUS1 Updated Energy Strategy

Prior to commencement of the development hereby approved (excluding demolition), an Updated Energy Strategy shall be submitted to, and approved in writing by, the local planning authority. The Updated Energy Strategy shall include an assessment of the annual baseline regulated energy demand (kwhr) as per 2013 Building Regulations (or subsequent amendments) and associated carbon emissions (kgCO₂ and tCO₂), and shall then set out the measures and technology required to achieve, as far as practicable, the zero carbon standards of the London Plan and an on-site reduction equal to or greater than 35% in the CO₂ associated with the baseline regulated energy demand.

The Updated Energy Strategy shall clearly define the 'be lean', 'be clean' and 'be green' measures to demonstrate that the development will meet as far as practicable the zero carbon standards of the London Plan and the minimum standards for onsite energy efficiency. Carbon-saving measures must be sufficiently evidenced with corresponding details and specifications including the location of low and zero carbon technology (i.e. roof plans showing the inclusion of PV panels), and the Updated Energy Strategy must clearly set out any annual shortfall (tCO₂) of the zero-carbon requirement.

The Updated Energy Strategy shall also provide details of the 'be seen' recording and reporting measures and demonstrate that the 'onsite saving' is being achieved in perpetuity.

The development must proceed in accordance with the approved Updated Energy Strategy.

REASON

In order to deliver the maximum on-site carbon savings in accordance with Policies SI 2 and SI 3 of the London Plan.

9 COM15 Sustainable Water Management

Prior to commencement of the development hereby approved (excluding demolition), a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how water is managed and demonstrate ways of controlling the surface water on site by

providing information on:

a) Sustainable Drainage:

i. Surface water discharge - the submitted drainage strategy must confirm the proposed method and location of discharging collected surface water from the site in accordance with the hierarchy set out in the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided. Any proposal that includes an off-site connection through a private sewer network should provide details of the condition and ownership of the entire drainage route to a public sewer or ordinary watercourse.

ii. SuDS - the submitted drainage strategy should incorporate Sustainable Drainage System (SuDS) elements that are embedded, where practicable, within the landscaping plan for the development. Preference should be given to above-ground SuDS elements that provide wider biodiversity, water quality and amenity benefits.

iii. Infiltration drainage - where infiltration drainage is proposed, a ground investigation must be provided to establish the level of groundwater on the site; to demonstrate the suitability of infiltration techniques proposed on the site by providing the results of infiltration testing in line with BRE Digest 365; and to confirm the suitability of infiltration drainage based on any encountered ground contamination.

iv. Runoff rates - surface water discharge from the site must be no greater than greenfield runoff rates at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus 40% climate change. Any increases above greenfield rates must be adequately justified and may be subject to developer contributions.

v. Drainage calculations - include calculations to demonstrate the volume of storage and size of drainage features provided is adequate to control surface water for a range of storm duration and rainfall intensities for events up to and including the critical 1 in 100 plus 40% climate change rainfall event.

vi. Exceedance routes - provide a plan showing the route surface water will take through the development for rainfall events exceeding the 1 in 100 year event. Where it is intended to store water on the ground surface, the maximum extent of overland flooding should be mapped and include details on flow paths, depths and velocities. Safe access and egress for the site must be demonstrated.

b) Long-term management and maintenance of the drainage system.

i. Provide a Management and Maintenance Plan for the drainage system that includes clear plans showing all of the drainage network above and below ground, and identifies the responsibility of different parties for each component of the drainage network.

ii. Include details of the necessary inspection regimes, maintenance frequencies and responsible authority (Private Management Company, homeowner, etc.).

iii. Where managed flooding of the ground surface is proposed, the plan should include the appropriate actions for those areas and document the actions required to ensure the safety of the users of the site during a rainfall event.

c) Minimise water use.

- i. incorporate water saving measures and equipment.
- ii. provide details of how rain and/or grey water will be recycled and reused in the development.

Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

REASON

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding in accordance with Policy EM6 of the Hillingdon Local Plan Part (2012), Policy DMEI 10 of the Local Plan Part 2 (2020) and Policy SI 12 of the London Plan (2021).

10 OM14 Fire Strategy

A) Prior to any above ground works for the development hereby approved (excluding demolition), the principles of a Fire Statement shall be submitted to, and approved in writing by, the Local Planning Authority. The statement shall detail how the development will function in terms of:

- (i) the building's construction: methods, products and materials used, including manufacturers' details
- (ii) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- (iii) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- (iv) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- (v) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- (vi) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

B) Prior to occupation of the development hereby approved, the final comprehensive Fire Statement shall be submitted to and approved in writing by the Local Planning Authority. This should be accompanied by the Building Control Decision Notice or equivalent. Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON

To ensure the safety of all building users in accordance with Policy D12 of the London Plan (2021).

11 NONSC Low Emission Strategy

Prior to any above ground works for the development hereby approved (excluding demolition), a low emission strategy (LES) shall be submitted to and approved in writing by the Local Planning Authority. The LES shall specify ways to manage air pollution emissions to conform with the LBH Local Action Plan. The measures are to include but not be restricted to the provision of electric mini buses, the provision of green roofs and planting, and a low emission model for the diesel backup generator as well as behavioural

measures such as walking, car sharing, cycling and anti-idling campaigns. It shall specify as a minimum the following:

- a) No idling on school grounds or ways of access to the school entrance;
- b) Implementation of suitable measures from the Mayor of London's Schools Air Quality Audit Toolkit demonstrating a clear steer towards an air quality positive approach and demonstrate the project's commitment to ensuring a high level of sustainability;
- c) a clear and effective strategy to encourage staff of the school to use public transport, cycle / walk to work where practicable. enter car share schemes, and purchase and drive to work zero emission vehicles.
- d) Provision of a clean low emission model for the diesel backup generator to be deployed on site and in alignment with the cleanest technologies in the market for diesel backup generators. The associated testing and maintenance regime is also to be designed in order to minimise to the maximum possible extent the NOx and PM2.5 annual emissions into the atmosphere.

The measures in the agreed scheme shall be maintained throughout the life of the development.

REASON

To reduce impacts on air quality in accordance with Policy SI 1 of the London Plan (2021), Policy DMEI 14 of the Hillingdon Local Plan Part 2 (2020) and the London Borough of Hillingdon Air Quality Action Plan 2019-2023.

12 A12 Parking Design and Management Plan

Prior to any above ground works for the development hereby approved (excluding demolition), a Parking Design and Management Plan shall be submitted to, and approved in writing by, the Local Planning Authority. It shall include the following:

- (i) The arrangements for all on-site parking, and to include provisions for managing, monitoring, enforcement and review. All on-site parking spaces shall be solely for use by the development hereby approved (e.g. staff, visitors, parents of students) and shall not be used for any other purpose or leased/sub-let.
- (ii) Details of 3 wheelchair accessible spaces, to be permanently retained within the car parking area.
- (iii) Details of 6 active electric vehicle charging points, to be increased by 20% annually over a five year period.
- (iv) Details of minibus spaces to be permanently retained within the car parking area.
- (v) The permanent retention of 38 parking spaces for use by Coteford School.

The vehicle parking provision and its management, as outlined in the approved Parking Design and Management Plan, shall be fully implemented as approved prior to the first occupation of the development, and the parking area shall not be used for any other purpose for the lifetime of the development.

REASON

To ensure the appropriate operation of the car park in accordance with Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan: Development Management Policies (2020) and Policy T6 of the London Plan (2021).

13 OM5 Bin Stores

Prior to any above ground works for the development hereby approved (excluding demolition), details of covered and secure facilities to be provided for the screened storage of refuse bins within the site shall be submitted to, and approved in writing by the Local Planning Authority. No part of the development shall be occupied until the facilities have been provided in accordance with the approved details and thereafter the facilities shall be permanently retained.

The details should demonstrate that there is sufficient space for the separate collection of general waste, recycling, clinical and food waste, and should therefore show space for the provision of 1 x 1100 litre bin for general waste, 1 x 1100 litre bin for recycling and 1 x 240 litre bin for food, with additional space for the storage of bulky items such as broken tables, chairs and equipment that cannot be disposed of within the provided waste containers.

REASON

To ensure compliance with Policies SI7 and D6 of the London Plan (2021) and Policy EM11 of the Hillingdon Local Plan: Strategic Policies (2012).

14 H14 Cycle Stores

Prior to any above ground works for the development hereby approved (excluding demolition), details of 40 long-stay and 4 short-stay covered and secure cycle storage spaces designed in accordance with London Cycling Design Standards, alongside changing facilities, lockers and showers for users of and visitors to the development, shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the development shall not be occupied or brought into use until the approved cycling facilities have been implemented in accordance with the approved plan, with the facilities being permanently retained for use by cyclists.

REASON

To encourage an uptake in cycling in accordance with Policy T5 of the London Plan (2021).

15 COM9 Landscaping

Prior to any above ground works for the development hereby approved (excluding demolition), a scheme of landscaping shall be submitted to, and approved in writing by, the Local Planning Authority. The scheme shall include:

A. Details of Soft Landscaping

A.a Planting plans (at not less than a scale of 1:100).

A.b Written specification of planting and cultivation works to be undertaken.

A.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate, to include pollution absorbing trees.

B. Details of Landscape Maintenance

B.a Landscape Maintenance Schedule for a minimum period of 5 years.

B.b Proposals for the replacement of any tree, shrub, or area of surfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

C. Schedule for Implementation.

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the area and provide appropriate cycling provision in accordance with Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Development Management Policies (2020).

16 COM7 Materials

Prior to any above ground works for the development hereby approved (excluding demolition), details of all materials and external surfaces, including fenestration, balconies, boundary treatments and balustrades, shall be submitted to, and approved in writing by, the Local Planning Authority.

Details should include information relating to make, product, type, colour and can include photographs and images.

Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

REASON

To ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Development Management Policies (2020).

17 COM10 Replacement Trees

Prior to any above ground works (excluding demolition), a scheme detailing the number, location and species of all replacement trees shall be submitted to, and approved in writing by the local planning authority, which shall ensure that all trees to be lost as a result of the development are replaced on at least a 1:1 basis, using appropriate tree species in appropriate locations.

REASON

To protect the verdant character of the area in accordance with Policy DMHB 14 of the Hillingdon Local Plan: Development Management Policies (2020).

18 NONSC Delivery and Servicing Plan

Prior to the first use of the development hereby approved, a Delivery and Servicing Plan, including tracked vehicle movements where necessary, shall be submitted to, and approved in writing by, the Local Planning Authority.

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON

To encourage out of hours/off peak servicing to help mitigate the site's contribution to local congestion levels in compliance with Policy T7 of the London Plan (2021) and Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020).

19 NONSC Community Use Agreement

Prior to the first use of the development hereby approved, a Community Use Agreement shall be submitted to and approved in writing by the Local Planning Authority, detailing how the main hall could be used by the local community out of school hours.

The Community Use Agreement shall include details of operating hours, access, parking arrangements and any other relevant consideration related to community uses within the main hall of the proposed new school, including further details on the type and frequency of community functions which could take place.

REASON

To encourage shared use of school facilities whilst safeguarding the residential amenity of the occupiers of adjoining and nearby properties in accordance with Policy S3 of the London Plan (2021) and Policy EM8 of the Hillingdon Local Plan Part 1 (2012).

20 COM8 Tree Protection Measures

All trees shown to be retained shall be protected from the impacts of construction through implementation of the tree protection measures outlined in the Tree Survey, Arboricultural Impact Assessment and Outline AMS (November 2022) and Drawing Nos. FS0728-WWA-ZZ-ZZ-D-L-0705 (Rev. P01) and FS0728-WWA-ZZ-ZZ-D-L-0706 (Rev. P01), including, where appropriate, establishing and protecting the relevant Root Protection Areas (RPAs) and Crown Protection Zones (CPZs) of retained trees.

REASON

To protect the verdant character of the area in accordance with Policy DMHB 14 of the Hillingdon Local Plan: Development Management Policies (2020).

21 COM31 Secured by Design

The development hereby approved shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No part of the development hereby approved shall be occupied until accreditation has been achieved.

REASON

To ensure the development provides a safe and secure environment in accordance with Policy DMHB 15 of the Hillingdon Local Plan: Development Management Policies (2020) and Policy D11 of the London Plan (2021).

22 NONSC Max Occupancy

The school hereby approved shall operate with a maximum student capacity of 180 students.

REASON

To ensure that the development is not overcrowded and that potentially adverse impacts of an operational school can be effectively managed on-site.

INFORMATIVES

1 I52 Compulsory Informative (1)

The decision to GRANT planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

2 I53 Compulsory Informative (2)

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan 2021 and national guidance.

DMAV 1 Safe Operation of Airports

DMCI 1 Retention of Existing Community Sport and Education Facilities

DMCI 1A	Development of New Education Floorspace
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 14	Air Quality
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D5	(2021) Inclusive design
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP G2	(2021) London's Green Belt
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP HC1	(2021) Heritage conservation and growth
LPP S1	(2021) Developing London's social infrastructure
LPP S3	(2021) Education and childcare facilities
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction

3 I70 LBH worked applicant in a positive & proactive (Granting)

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

4 I72 Section 106 Agreement

You are advised that this permission has been granted subject to a legal agreement under Section 106 of the Town and Country Planning Act 1990.

5

Written Schemes of Investigation (WSIs) will need to be prepared and implemented by a

suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. Additionally, Condition 4 is exempt from deemed discharge under schedule 6 of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

6

The applicant is advised to contact Jane Sidell (jane.sidell@HistoricEngland.org.uk) and Sandy Kidd (sandy.kidd@HistoricEngland.org.uk) regarding the proposed development prior to beginning any works on site. The applicant is further advised of the need to obtain Scheduled Monument Consent from Historic England separately from the planning process before they could carry out any works affecting the Scheduled Monument.

7

The applicant is advised that they will need to obtain a Bat Licence, issued by Natural England under a separate legislative regime to the planning process, before development commences, because of the presence of roosting bats on site.

3. CONSIDERATIONS

3.1 Site and Locality

The application site comprises an existing one-storey Special Educational Need (SEN) school and the surrounding land, falling within Use Class F1(a), and which comprises the northern half of the wider school grounds which also includes Coteford Junior School (operating from the southern half of the wider site). The existing main building is located in the north-western corner of the site, accessed from a long driveway which extends through most of the site, connecting with Fore Street to the east, with a clockwise one-way loop adjacent to the entrances of the two schools.

Grangewood School operates as a primary school for up to 100 students aged 3-11 with severe learning difficulties and complex needs, including autism and multi-sensory impairment, employing 70 members of staff. The existing car parking provision is 72 spaces, which includes provision for the adjacent Coteford Junior School, alongside 3 permanent minibus parking spaces dedicated for the school's own use.

Most of the undeveloped land within the application site is woodland, with Ruislip Woods to the north and west of the site (and partially within the site), which is a protected Site of Special Scientific Interest (SSSI), and also includes a Scheduled Ancient Monument (SAM). Small areas of hardstanding, used for parking and the waiting of vehicles during drop-off and pick-up periods are located around the northern and western parts of the site.

The built form in the wider area is predominantly characterised by two-storey residential properties, although it is noted that Coteford Infant School is located approximately 5 minutes' walk to the south on Fore Street, and the areas to the north and west are characterised by dense woodland.

3.2 Proposed Scheme

The proposal seeks permission for the demolition of the existing school building and the erection of a larger, part one and part two-storey replacement building, to continue to operate as an SEN School but with improved modern facilities whilst allowing for an uplift in the number of pupils which can attend, with a new maximum occupancy of 180 pupils (an

increase of 80). This proposed increase would specifically allow students at the Royal National Institute of Blind People (RNIB) Sunshine House School in Norwood, who have similar levels of educational needs, to be incorporated. Additionally, the creation of a new modern building would allow the school to support a wider range of needs, and is proposed to cater for students aged 4-19, as opposed to students aged 3-11 as is currently the case

The new school building would have a larger footprint than at present and would extend further east and west, to provide an increase in teaching space alongside supporting office, dining and recreational spaces, and would employ up to 130 (FTE) staff (an increase of 60). This correlates with the increase in internal floorspace (from 2110 sqm to 4884 sqm) and the number of teaching spaces (from 11 to 39). There would also be an increase in the number of parking spaces and a reconfiguration of the car parking layout, with 110 car parking spaces proposed (including 38 for Coteford Junior School), to comprise 107 standard bays and 3 wheelchair accessible bays (an increase of 38). The number of minibus spaces would remain unchanged, however the proposed layout would allow for up to 7 minibuses to use the pick-up and drop-off facilities simultaneously.

A permeable 360 sqm asphalt Multi Use Games Area (MUGA), enclosed by a 3 metre high weldmesh fence, would be located in the south-west part of the site for more formal sports activities, alongside three internal courtyards adjacent to the classrooms within the centre of the building and a terrace on the first floor, to accommodate informal active play space, a sensory garden and an outdoor horticultural learning area.

No development is proposed within the woodland areas to the north and west of the site (within the SSSI and affecting the SAM), except for the replacement of the existing fence with a new taller fence to secure the site, and it should be noted that the proposal includes a new UKPN substation, which would be located near to the entrance to the school site from Fore Street.

3.3 Relevant Planning History

Comment on Relevant Planning History

The planning history of the school relates to various minor extensions and the erection of detached outbuildings within the wider school grounds. This planning history is not relevant to the current application.

4. Planning Policies and Standards

Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)

The Local Plan: Part 2 - Development Management Policies (2020)

The Local Plan: Part 2 - Site Allocations and Designations (2020)

The London Plan (2021)

The West London Waste Plan (2015)

The National Planning Policy Framework (NPPF) (2021), Planning Practice Guidance, as well as relevant supplementary planning documents and guidance are all material consideration in planning decisions.

The proposed development has been assessed against development plan policies and relevant material considerations, as discussed below.

UDP / LDF Designation and London Plan

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.CI1	(2012) Community Infrastructure Provision
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM11	(2012) Sustainable Waste Management
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.HE1	(2012) Heritage

Part 2 Policies:

DMAV 1	Safe Operation of Airports
DMCI 1	Retention of Existing Community Sport and Education Facilities
DMCI 1A	Development of New Education Floorspace
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 14	Air Quality
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D5	(2021) Inclusive design
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP G2	(2021) London's Green Belt
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP HC1	(2021) Heritage conservation and growth

LPP S1	(2021) Developing London's social infrastructure
LPP S3	(2021) Education and childcare facilities
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **21st December 2022**

5.2 Site Notice Expiry Date:- **10th January 2023**

6. Consultations

External Consultees

Letters dated 25-11-22 were sent to 180 nearby properties, including properties on Fore Street, Coniston Gardens, Maybank Gardens, Wentworth Drive, Grangewood Close, Wood Rise, Dormywood, and Park Avenue. Additionally, one site notice was displayed outside the site on 20-12-22, and a press notice was displayed in a local newspaper on 30-11-22.

Eight responses (three objections, four in support and one neither objecting nor supporting) were received following public notification, raising the following material considerations:

- Proposal will create much needed places for pupils with severe learning disabilities
- Current school is no longer fit for purpose and new development will be of a higher quality
- Increased traffic from construction and once operational
- Worsened pedestrian safety
- Increase in surface water flooding

EASTCOTE RESIDENTS' ASSOCIATION (23-12-22): We write to state that we have no objections to this application.

In fact, we fully support such an important project to improve and increase the existing facilities to provide a new special needs and disabilities (SEND) school to meet current and future requirements. The places provided in such a school are much needed and sought after and thus so important to achieve. We appreciate the very diligent and inclusive application documentation provided. This appears to have covered all the aspects that are very relevant to this site, not only in relation to the buildings and its own landscaping (wooded area etc), but also in relation to the wider ecological and biodiversity issues regarding the fact that it is bordered on three sides by Ruislip

Woods, which is a National Nature Reserve and Site of Special Scientific Interest. We are pleased to see that the presence of bats, which are fully protected, was noted and a survey provided. Also that Natural England will be consulted on appropriate measures to prevent any effects on the habitats and wildlife arising during construction. Furthermore, we see how various reports and plans have been included which come together to provide a holistic view of how this project can be achieved, for the wider community with, such reports including, most importantly, protecting the requirements of the closer, adjacent Coteford School site as well.

We do ask that, LBH having assessed the application and all the issues to be addressed, in any approval granted, specific conditions are included to provide all the necessary protections, where additionally needed, for the Grangewood site itself, its surrounding sites, including Coteford School, and the wider community.

GREATER LONDON ARCHEAOLOGICAL ADVISORY SERVICE (07-12-22): The planning application lies within the Ruislip Archaeological Priority Area (APA), as identified in the Local Plan.

As described in the applicant's archaeological desk-based assessment, the Ruislip APA covers Ruislip medieval village and castle and its associated deer park within Ruislip Woods. This is one of the best surviving examples of a medieval rural landscape within Greater London (and former Middlesex) combining historic buildings, archaeological monuments, ancient woodland and associated industrial remnants of a brick and tile industry. The deer park's significance is enhanced by a reference in the Domesday Book, an unusually early documentary record for this type of asset.

The application site itself lies away from the medieval village within the mediaeval deer park. The deer park's boundary earthwork ('the pale') survives in woodland to the north of the application site where it is protected as a scheduled monument. Part of the pale earthwork is mapped within the application site running alongside and immediately west of Fore Street. This short section is not scheduled but should be considered of equivalent significance and protected. Within the park it is possible that buried archaeological remains could be encountered, for example, of hunting-related structures (e.g. stands or fences) or finds (e.g. hunting gear) or ancillary woodland activities such as charcoal burning or brick/tile manufacture. Evidence of such medieval industry has been found around Ruislip, most recently during investigations for High Speed 2.

The school buildings themselves will likely have removed all archaeological interest within their footprint but where that is to be extended groundworks may reveal and harm buried remains. I therefore recommend that trial trenching is carried out to establish whether significant archaeological remains survive.

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case the consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

The development does not propose any works affecting the pale earthwork but I recommend a condition to protect it from construction-related impacts.

HISTORIC ENGLAND (22-12-22): This response relates solely to the impact of the proposed security fence upon the scheduled monument, which raises concerns. My colleague has already written regarding the archaeological implications for the rest of the project.

The proposed development site is adjacent to the scheduled monument of the Pinner Park Pale, a

relict medieval earthwork. This is a rare and valuable trace of the medieval landscape in the area, and reflects a very specific aspect of medieval rural topography and pastimes, where deer parks were created for hunting purposes. It is a fragile element in the landscape, and its importance is underscored through its designation as a scheduled monument. It is very important to protect this feature in the landscape, to allow people to understand how the area has developed and been used in the past through this fragile physical trace of the past.

The proposed boundary fence shown in the application associated with the school comes very close to the earthwork and crosses it at the eastern end of the site and appears to clip it further north. It is unclear to me whether a fence already exists and is to be replaced, or whether a new fence is to be installed. Any groundworks would require scheduled monument consent and would require significant justification. Should there be an existing fence, then re-use of the holes for posts would be acceptable, but the applicant should be directed to contact me at Historic England, just to discuss the project. A new fence crossing the monument would not be acceptable, unless there were exceptional needs and no alternative, but it should be possible to adjust the location of the fence to miss the protected earthwork. I would ask you to consider this in your planning report and decision.

The earthwork should remain unchanged, with no new interventions into it. Should the applicant have a compelling case, they should be directed to discuss it with Historic England.

Historic England has concerns regarding the application on heritage grounds and ask that you consider our points regarding the siting and installation of fencing to ensure the scheduled monument is protected.

NATURAL ENGLAND (19-12-22): No objection, subject to appropriate mitigation being secured.

We consider that without appropriate mitigation the application would damage or destroy the interest features for which Ruislip Woods Site of Special Scientific Interest (SSSI) has been notified. In order to mitigate these adverse effects and make the development acceptable, the submission of a Construction Environmental Management Plan (CEMP) should be secured as mitigation. We advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.

THAMES WATER (28-11-22): Thames Water would advise that with regard to waste water network and sewage treatment works infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

Internal Consultees

ACCESSIBILITY OFFICER (26-11-22): This proposal seeks to demolish and replace the existing Grangewood School with a 180-place Special Educational Needs and Disabilities (SEND) School. The redevelopment is intended to provide an improved educational environment to serve the long term needs of pupils with severe and profound learning difficulties including autism and multiple complex impairments.

In assessing this application reference has been made to London Plan policy D5, D12, S3 and T6.5.

No fundamental concerns are raised with the exception of the following:

1. Given the nature of the proposed school, an increase in the number of accessible parking bays should be secured at this stage in accordance with London Plan policy T6.5 Table 10.6.
2. The enlarged parking bays could be marked and signed as 'Universal Access' for use by minibuses and similar type vehicles providing door to door transport.

Conclusion: revised plans should be requested to address points 1 and 2 above, with conditions attached to any approval.

AIR QUALITY OFFICER (09-01-23): The proposed development is located within the LBH Air Quality Management area (AQMA), and within 522m from Eastcote Village Focus Area, and is likely to originate additional traffic emissions which will add to current poor air quality in the area. Proposals are required to improve air quality within Focus Areas.

As per the London Plan and LBH Local Action Plan 2019-2024, developments need to be neutral as minimum and positive in Focus Areas, contributing to the reduction of air pollutant emissions in these sensitive locations. LBH requires new developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor (LBH Air Quality Local Action Plan 2019-2024), namely Focus Areas. Furthermore, policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area. Finally, the London Plan (March 2021) requires development of this size to be air quality neutral as minimum and air quality positive, actively contributing to reduce pollutant emissions to the atmosphere.

Based on the information provided in the Transport Assessment report to support the planning application, the proposal is air quality neutral and air quality positive for transport emissions. Table 1 summarises the location constraints of the application site and proposed development and requirements that must be met once granted planning permission.

The energy model for the proposed development is based on the use of electric boilers or air source heat pumps for space and water heating for the buildings. For emergency situations, a diesel backup generator is being proposed. Given the nature of the proposed development (the provision of a Special Education Needs and Disability school (SEND) use class F, and given that the model and maintenance regimen of the proposed diesel backup generator is unknown at the time of writing, the proposed backup generator will be subject to condition to make sure the technology to be deployed is as clean as possible to meet the clean by design requirement minimising pollutant emissions to the maximum possible extent.

I suggest conditions relating to a Low Emission Strategy and reducing emissions from demolition and construction.

BIODIVERSITY OFFICER (23-12-22): The updated Bat Report from November identifies bat roosts within the building to be knocked down. This would therefore result in the destruction of bat roosts including a long-eared bat maternity roost.

This is evidently a significant concern and should trigger further information for the Council to make a decision. Whilst there is some overlap with the Natural England licensing process, one process can't rely on the other. Natural England cannot give their licence until planning permission is in place; the Council cannot reach a positive determination until it is satisfied that a bat licence would likely be issued.

The Government guidance states that before you can grant planning permission, you must make

sure any mitigation or compensation conditions you impose do not conflict with the requirements of a bat mitigation licence and be confident that Natural England will issue a licence.

You do not need to consult Natural England on the wording or discharge of any conditions you impose on a planning proposal. Natural England is unable to provide advice on this.

At this stage the Applicant has not addressed either of these grounds. There is inadequate information on how best to mitigate the bat population and the net-gain assessment doesn't even consider bats.

Part of the licence consideration is to determine whether there is an overriding need for the development that outweighs the impacts to the bats and if there is, that mitigation is in place to preserve the conservation of the species.

The applicant needs to provide a commentary on the bat conservation of the species to allow the Council to determine what the actual impacts are in this area and the applicant needs to provide specific mitigation, akin to what would be required through a Natural England licence. The planning authority will then need to determine whether they think, based on the above and taking into account the need for the development, whether Natural England will grant a licence.

BIODIVERSITY OFFICER (05-01-23): I believe the updated information in the document titled 'Response on Biodiversity Matters (2145/APP/2022/3534)' is sufficient.

You will have to be satisfied that their case for the development need is satisfactory as there is a clear harm to bats. The impacts will be harmful although works will be undertaken under licence and mitigation is in place. Nonetheless, the LPA must be satisfied that there is a robust need argument that justifies the destruction of roosts, including an important maternity roost.

A condition specific to ensuring bat mitigation is necessary.

CONTAMINATION OFFICER (21-12-22): I have reviewed a copy of the geo-environmental information within the following report submitted in support of the application.

The report provides suitable details from a phase 1 Desk study which includes an initial conceptual site model and preliminary risk assessment.

The report indicates made ground materials, associated with the development of the existing buildings and earlier local earthworks, may be present at the site. The preliminary risk assessment identifies a low to moderate risk from plausible contaminant linkages.

The report recommends a ground investigation to be conducted and in turn I recommend that details of this be secured by condition.

ENERGY OFFICER (23-12-22): Please note the energy assessment does not meet the requirements of the London Plan or reflect the guidance issued. Notwithstanding this, the application is not unusual nor unique and it is reasonably foreseeable that the development would be policy compliant and achieve zero carbon standards through a combination of onsite and offsite measures, which should be secured as a condition and planning obligation which work together in tandem.

HIGHWAYS OFFICER (22-12-22): An application has been received seeking planning permission to demolish the existing Grangewood school building located at Fore Street Eastcote and construct a part one-storey, part two-storey Special Education Needs and Disability School (SEND) (Use Class F) in its place.

Further, the proposal will include associated landscaping, play space access, refuse and recycling storage, car and cycle parking and finally associated works. The development will make provision for 110no. on-site parking spaces which will include 3no. disabled parking bays. Six of these spaces would be provided with electric vehicle charge points. There would be 40no. long stay and 4no. short stay on-site cycle parking spaces. Provision has also been made for minibuses that will drop-off/pickup students, these are as follows 8no. minibuses that will drop-off/pickup student in dedicated bays with associated hardstanding, 9no. will wait near to the drop-off/pickup bays and move forward as they become available.

Furthermore, 3no. permanent long stay parking bays have been provided for minibuses. The development will host 130no. full time members of staff and 180no. students. It should be noted that the cycle provision number worked out by the applicant was based upon a level of 140no. staff. The site is located within a heavily residential built area of the borough.

The surrounding residential streets do not contain any parking restrictions, though there are 'school keep clear' yellow zig zags at the main school entrance. Vehicle access into/out of the site will remain the same as it is now via Forecourt Street, also access for pedestrians and bikes will be through the same entrance.

The proposal site has a PTAL rating of 1a indicating that its access to public transport is poor when compared to London as a whole suggesting that there will be a strong reliance on the private car for trip making. The closest Underground stations is Northwood Hills which is c.25-minute walk and a c.7-minute bike ride to the site. Trip generation information was provided by referring to the TRICS database, nevertheless as noted in the applicants Transport Statement itself the sites selected are not suitable comparisons as none are SEND schools.

Neither the Hillingdon Local Plan: Part 2 Development Management Policies (2020) or the published London Plan 2021 provide parking standards for Special Education Needs and Disability Schools (SEND). To determine whether the 110no. car parking spaces proposed at Grangewood is appropriate the Highway Authority has referred to planning application at Moorcroft School, Bramble Close, Hillingdon for a single storey extension to provide additional teaching space reference 49008/APP/2020/1069. This is a secondary school for students between 11 and 19 years old with severe learning disabilities (SLD), profound and multiple learning disabilities (PMLD) and autistic spectrum disorders (ASD).

Moorcroft has a role of 79no. students and 60no. staff members, a ratio of staff to pupils of 0.65 ($60/79=0.75$). As mentioned above, Grangewood School has a role of 180no. students and 130no. staff, a ratio of staff to students of 0.72 which is very similar ($130/180=0.72$) to Moorcroft School. At Moorcroft 9no. mini-buses serve the school; a mini-bus to pupil ratio of 0.11 ($9/79=0.11$), whilst Grangewood would have 20no. mini-buses serving 180no. pupils; also a ratio of 0.11 ($20/180=0.11$).

From this comparative analysis the Highway Authority considers the number of car parking spaces provided at Moorcroft to be a good benchmark upon which to judge whether the 110no. car parking spaces proposed at Grangewood is appropriate. There are 61no. car parking spaces at Moorcroft to serve a school with 60no. staff, this represents a space to staff member ration of 1.0 ($61/60=1.0$). The application site Grangewood would provide 110no. car parking spaces to serve 130no staff a space to staff member ratio of 0.84. Whilst there would be proportionately fewer car parking spaces per member of staff at Grangewood compared to Moorcroft, the difference is considered marginal, taking into account staff numbers and the pupil role the 110no. car parking spaces proposed at Grangewood is considered acceptable if supported by a robust Travel Plan.

The Highway Authority has reviewed the submitted travel plan and finds more emphasis could have been placed upon the use of car sharing for members of staff, since the main mode travel to the site will be via a car. Furthermore, it is found that the idea of promoting will not always guarantee uptake

by staff and more could be done to encourage usage through the use of genuine incentives.

The Highway Authority would like to highlight that where the 9no. minibuses would be waiting when students are being dropped-off/picked-up, would impede access to the on-site parking spaces that have been allocated for electric vehicle charging points and the 3no. disabled parking bay. It is understood that some staff will arrive at the site before 08:15 hours, with others arriving up until 09:30. The vast majority of students, 98% of students would arrive between the hours of 08:00 and 09:00. Furthermore, there would be a similar overlap in the afternoon period.

The Highway Authority requires that the 3no. disabled parking bays are moved adjacent to the existing garage to ensure their access is not impeded by waiting minibuses. For the same reason the active electric vehicle charging points should be moved near to the same location so that these they are never obstructed by waiting minibuses. If staff wish to use them; they can then do so without issue.

The development of the school will see the on-site cycle parking increased to 40no. long-stay and 4no. short-stay for visitors, this will be an increase from the existing 30no. on-site cycle spaces. As earlier mentioned, the cycle provision has been based upon staffing levels to be at 140no., the London Plan 2021 Policy T5 Cycle for long-stay would be 1no. space per 8no. FTE staff plus 1no. space per 8no. students, this would equate to 16no. for staff and 23no. for students. A further 2no. for short stay per 100 students. Therefore, Highway Authority find the over provision of 40no. long stay and 4no. short stay to be satisfactory.

As stated above the development will be providing 6no. active electric vehicle charging points. Furthermore, an additional 20% increase of charging points will be seen every year over a five-year period, this is anticipated to be in line with electric vehicle ownership increase. The Transport Statement makes mention of the London Plan Policy T6 not specifying requirements for schools to have electric vehicle charging points, the published London Borough of Hillingdon Local Plan Part 2 Development Management Policies 2020 Parking Standards No.10 Parking for electric vehicles states that 'Parking for electric vehicles should be provided at a current minimum of 5% of car parking spaces with 5% passive provision'. This would equate to 5no. active charging points, with a further 5no. being passive. However, the Highway Authority finds the 6no. active with the 20% annually increased to be sufficient.

There are no highway objections to this proposal subject to the following conditions:

Subject to the condition that the applicant sends the Highway Authority a Service and Delivery plan for approval.

Subject to the condition that the applicant sends the Highway Authority a Construction and Logistics plan for approval.

Subject to the condition that the applicant sends the Highway Authority a revised Car Parking Management Plan in full for approval.

Subject to condition that the applicant enters a 1990 Town and Country Planning Act s.106 legal agreement with the developer for a £20,000 bond towards enacting of the Travel Plan, in the event that of it not being delivered the Highway Authority will use this bond to implement the Travel Plan itself. If the Travel Plan is successful, the bond will be returned.

Subject to condition requiring the developer to send the Highway Authority plans showing the relocated disabled bays and 6no. active electric charging points for approval.

Subject to the condition that the on-site electric vehicle charging points are increased annually by

20% over a five-year period.

NOISE OFFICER (07-12-22): No comment.

PLANNING POLICY OFFICER (22-12-22): The School Place Planning team has commented and is supportive of this scheme. It indicates that the school is key to local authority's SEND sufficiency strategy in order to meet need in the area. As per policy DMCI 1A of the LPP2 and Policy S3 of the London Plan, the Council is supportive of new education floorspace where there is an identified need. Regard should be had to Policy S3 of the London Plan and Policy DMCI 1A of the LPP2.

SCHOOL PLACE PLANNING OFFICER (07-12-22): Hillingdon as a local authority (LA) has a legal duty to provide pupils with sufficient school places to meet residents' needs. All existing special schools and special resources places provision are full, some beyond capacity, but demand is still rising from pupils with statutory Education, Health and Care Plans (EHCPs) and the cost of buying independent places outside the borough leads to long journeys for pupils and has led to a growing deficit on the LA Dedicated Schools Grant which is unsustainable.

To meet this demand, Hillingdon Council strongly supports the new Pinn River Special Free school to be built on the site of the current Grangewood school, with Hillingdon LA commissioning all the places when the school opens and into the future. The design will provide excellent facilities to meet the needs of pupils with the most profound needs. It will have 180 pupils and Hillingdon LA will be commissioning all the new places in both Pinn River and the new Grand Union Village Free Schools, with an ongoing increase in Hillingdon residents in both schools. This will reduce the LA use of independent placements, especially for pupils with multiple sensory impairments and those with the most complex mix of profound and severe learning difficulties and associated autistic spectrum conditions.

Pinn River free school is key to the LA SEND Sufficiency strategy in order to meet rising demand, including from new pupils moving into the borough and subsequently the safety valve agreement that the Local Authority has with the DfE. They are crucial to LA plans to meet SEND needs more effectively in-borough and to reduce the deficit on the High Needs Block.

The Borough is committed to ensuring each pupil has the most appropriate provision to support them to thrive, so far as possible local to their home, and the plans suggest Pinn River will be a fantastic new provision which will improve the lives of many young people.

TREE OFFICER (09-01-23): As discussed these are the plans that I had a site visit about. It was useful to be able to put the level of tree removal into context with the number of trees on site. I have no objections to the approval of the application subject to them following the tree protection plans they have submitted and a condition for tree replacements.

I agree that the tree removal to the rear of the school is unavoidable due to the layout of the new school, The Oak to the north/west corner of the building this is probably the nicest tree scheduled for removal, however due to the nearby tree cover its removal will have limited visual impact.

I will not object to this scheme but would expect them to include a management plan for the central island to include plans of tree work to the remaining trees as well as plans to improve and diversify the area with additional understorey planting.

It was also agreed that a rigorous method statement to include arboricultural supervision would be required for the demolition and construction phase with a focus on protecting the trees on the bank to the north of the building as well as how materials will be brought onto site.

WASTE STRATEGY (19-12-22): Swept path analysis adequate for collection of refuse. Please

ensure that refuse storage can accommodate a 50/50 split of 1100 litre general waste and recycling containers, plus space for 240 litre food waste containers at a rate of 1 container per 250 children on roll.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

Paragraph 119 of the National Planning Policy Framework (NPPF) states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

In addition, Paragraph 95 of the NPPF highlights the importance of ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities, and outlines that Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. As such, great weight should be given to the need to create, expand or alter schools through the preparation of plans and decisions on applications.

At a pan-London level, Policy S1 of the London Plan (Developing London's social infrastructure) sets out that proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported, recognising their important role in developing strong and inclusive communities. Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life, including health and education facilities.

Specifically, Policy S3 of the London Plan (Education and childcare facilities) states that proposals for education uses should be located in areas of identified need, be accessible for all users and should seek to include multiple or shared uses with other education providers if possible, ensuring that there is a sufficient supply of good quality education facilities to meet demand and ensuring no net loss of educational facilities unless it can be demonstrated that there is no ongoing or future need.

The supporting text to Policy S3 outlines that there is a growing need for school places in London, including SEN provision, with some to be provided within mainstream schools and others to be provided within specialist schools, such as proposed at this site. The supporting text further outlines the importance of providing high quality education for all, recognising that good education can have a profound impact on people's lives and can help to break down social inequality and improve social mobility.

At a borough level, Policy CI1 of the Hillingdon Local Plan Part 1 (Community Infrastructure Provision) seeks to resist the loss of community facilities, ensuring no net loss of floorspace where demolition is required, whilst supporting the retention and enhancement of existing facilities. This includes supporting extensions to existing schools and the development of new schools.

Additionally, Policy DMCI 1 (Retention of Existing Community Facilities) and Policy DMCI 1A (Development of New Education Floorspace) of the Hillingdon Local Plan Part 2 collectively seek to ensure that existing community facilities, such as schools, are protected from redevelopment into other, non-community uses whilst supporting the provision of new education floorspace to ensure that the local authority meets its statutory

duty to provide school places for all children within the borough. Policy DMCI 1A further outlines that a new school or an expansion of an existing school should have regard to the surrounding land uses and planning designations to ensure additional floorspace can be satisfactorily accommodated without conflicting with other development plan policies.

As outlined in the NPPF, and based on the above policies, it is clear that there is a general presumption in favour of new and improved education facilities with "great weight" attached to the need to create, expand or alter schools where this would improve the ability for a local authority to meet its legal duty to provide a sufficient number of school places. As outlined in the School Place Planning Officer's comments, all existing provision for SEN places are full, with some facilities operating beyond capacity, whilst demand is still rising and the cost of buying independent places outside the borough both leads to long journeys for pupils and has led to a growing and unsustainable deficit to the authority's budget. Given the urgent need for new SEN school place provision within the borough, which this proposal would help to alleviate with plans to be operational in 2025, and noting that the additional capacity of the new school is considered crucial to efficiently meeting SEN needs in the borough, it is considered that very high levels of weight should be given in favour of the proposal in the planning balance.

Additionally, as an existing SEN school, which is seeking to expand its capacity (from 100 to 180 pupils) through demolition and rebuilding a larger and more modern building, there is no land use change, and the proposal further makes efficient use of a brownfield site.

It should be further noted that both Policy S3 of the London Plan and Policy DMCI 1A of the Hillingdon Local Plan Part 2 encourage shared or multiple community uses, particularly sports, play, training and meeting spaces, within developments for new education facilities outside of their main operating hours, in order to use land more efficiently. In this regard, it is proposed that the main hall at ground floor level could be used for community use outside of school hours and further details of this would be secured within a Community Use Agreement, which would be secured as a planning obligation.

Overall, the principle of the proposed development is considered acceptable as the proposal complies with development plan policies, which is afforded significant weight in favour of the proposal.

7.02 Density of the proposed development

Not relevant to this application.

7.03 Impact on archaeology/CAs/LBs or Areas of Special Character

The application site falls within the Ruislip Motte and Bailey Archaeological Priority Area (APA), whilst the Pale Park Scheduled Ancient Monument (SAM) is present in part of the north and east areas of the site. Both the APA and SAM are designated heritage assets and should therefore be protected, and if possible, enhanced.

Paragraphs 199 - 202 of the NPPF advise that where a proposed development would lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

The NPPF further advises that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Whether a proposal causes substantial harm will be a judgment for

the decisionmaker, having regard to the circumstances of the case, relevant local policies and the consideration of the NPPF. Public benefits to offset this harm may follow from many developments and could be anything that delivers economic, social or environmental objectives, and public benefits should flow from the proposed development so that they are of a nature or scale to be of benefit to the public at large and not just of private benefit.

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance. The more important the asset, the greater the weight should be. As such, any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting), should require clear and convincing justification.

Policy HC1 of the London Plan (Heritage conservation and growth) states that proposals affecting heritage assets and their settings, should conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. Proposals should also identify assets of archaeological significance and use this information to avoid or minimise harm through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.

In this regard, heritage 'significance' is defined as the archaeological, architectural, artistic or historic interest of a heritage asset. This may be represented in many ways, in an asset's visual attributes, such as form, materials, architectural detail, design and setting, or through historic associations between people and a place, and where relevant, the historic relationships between heritage assets.

Additionally, Policy HE1 of the Hillingdon Local Plan Part 1 (Heritage) states that the council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes designated heritage assets such as statutorily listed buildings, Conservation Areas and Archaeological Priority Areas and further sets out that harm to the significance of non-designated heritage assets (recognised at a local level) such as Areas of Special Local Character and locally listed buildings will also be resisted.

Also in this regard, Policy DMHB 1 of the Hillingdon Local Plan Part 2 (Heritage Assets) states that proposals are expected to avoid harm to the historic environment, and proposals which result in harm will only be allowed if it brings an asset back into viable use, it would provide public benefit that would outweigh the harm or loss, and the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials.

Policy DMHB 7 of the Hillingdon Local Plan Part 2 (Archaeological Priority Areas and Archaeological Priority Zones) specifically seeks to protect and mitigate any harm to underground heritage assets, including through the submission of a desktop study, followed by investigative groundworks (e.g. trial pits) if appropriate. This should further include proposals for the recording, archiving and reporting of any archaeological finds.

As set out above, a very small part of the north-eastern corner of the site overlaps with the Park Pale SAM, where a replacement fence is proposed as part of the overall works, replacing an existing 1.8m high weldmesh fence with a 2.4m weldmesh fence. The replacement fence would be of the same specifications and colour, and would be plotted

along its current alignment using the same post holes. In this regard, comments from Historic England raised concerns with the replacement fence and the potential impact on the SAM, which is a rare and valuable trace of the medieval landscape in the area, and have stated that the earthwork should remain unchanged, with no new interventions into it.

On the basis that the proposed fence is a taller replacement for an existing fence, but would be plotted along the same boundary and would utilise existing post holes, it is considered that this matter can be controlled with a condition to protect the SAM, and require further consultation with Historic England prior to any works affecting the SAM. It should be noted that the applicant would also need to apply for a Scheduled Monument Consent from Historic England separately from the planning process before they could carry out any works affecting the SAM.

In addition to the SAM, the Ruislip Motte and Bailey APA covers the whole site, which is one of the best surviving examples of a medieval rural landscape within Greater London (and former Middlesex), combining historic buildings, archaeological monuments, ancient woodland and associated industrial remnants of a brick and tile industry. Comments from the Greater London Archaeological Advisory Service (GLAAS) set out that the initial construction of the existing school buildings will likely have removed all archaeological interest within their footprint but where that is to be extended, the groundworks may reveal and harm buried remains. To address this, GLAAS recommend that trial trenching and field evaluation is carried out to establish whether significant archaeological remains survive, and that this be secured by condition.

Additionally, whilst Eastcote Village Conservation Area is approximately 200 metres to the east, and there are numerous locally listed buildings on Fore Street and Coteford Close, these designated and non-designated heritage assets would be unaffected by the proposal due to its relatively small size and location deep within the site.

Overall, whilst the site's heritage is heavily protected as a result of the SAM across part of the site and the APA which covers the whole site, the concerns raised can be satisfactorily addressed through the use of conditions to ensure that no harm arises, in keeping with the advice received from both Historic England and GLAAS. On this basis, the proposal is considered to comply with Policy HC1 of the London Plan, Policy HE1 of the Hillingdon Local Plan Part 1, and Policies DMHB 1 of DMHB7 of the Hillingdon Local Plan Part 2.

7.04 Airport safeguarding

Policy DMAV 1 of the Hillingdon Local Plan: Development Management Policies (Safe Operation of Airports) sets out that the council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. In this instance, the requirement to consult on airport safeguarding is for any proposal exceeding 90 metres high (Heathrow) and 15.2 metres high (Ministry of Defence). The proposal would have a maximum height of 9.2 metres, and it is therefore not necessary to consult on airport safeguarding, as the proposal, by reason of its height would not pass the threshold. In any event, a condition requiring details of cranes to be used during construction is recommended.

7.05 Impact on the green belt

Policy G2 of the London Plan (London's Green Belt) and Policy DMEI 4 of the Hillingdon Local Plan Part 2 (Development in the Green Belt or Metropolitan Open Land) seek to prevent inappropriate development in the Green Belt in order to protect its permanent openness.

The application site abuts the Green Belt (which follows the boundary of Ruislip Woods to

the west, north and east, and also includes the playing field to the south of the Coteford Junior School building. Given that the application site falls fully outside the Green Belt boundary, the openness of the Green Belt itself would be unaffected by the proposal, notwithstanding that the replacement building would be of a relatively modest scale which would not affect any public views of the Green Belt.

7.07 Impact on the character & appearance of the area

Policy D3 of the London Plan states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site whilst the design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, including existing and planned supporting infrastructure capacity.

As such, proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape with due regard to building types, forms, proportions and the street hierarchy. Proposals should encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings that are aligned with peoples' movement patterns and desire lines in the area and facilitate efficient servicing and maintenance of buildings and the public realm that minimise negative impacts on the environment, public realm and vulnerable road users.

At a local level, Policy BE1 of the Hillingdon Local Plan: Strategic Policies (Built Environment) sets out that in order to create successful and sustainable neighbourhoods, new development (including new buildings, alterations and extensions) should be of a high-quality design which enhances the local distinctiveness of the area and contributes to a sense of place. As such. Proposals should be designed to be appropriate to the context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials. In addition, proposals should not result in the inappropriate development of gardens and green spaces as this could lead to the erosion of the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas.

Policy DMHB 11 of the Hillingdon Local Plan: Development Management Policies (Design of New Development) further sets out that all development will be required to be designed to the highest standards and incorporate good design principles to ensure proposals harmonise with their local context in terms of scale, plot size, layout, architecture and landscaping.

The overall design of the scheme has had specific regard to its intended use as a SEN school, and consequently its form and layout seek to comply with DfE guidance (such as Building Bulletin 103) and create bespoke spaces that can support the range of pupils' educational, therapeutic and medical needs, whilst responding to the natural and built context surrounding the application site to minimise environmental impacts, such as on the SSSI and Ruislip Woods.

The replacement building would sit in largely the same location as the existing building, albeit with a slightly larger footprint, which allows the school to retain its main entrance in a similar location which allows for convenient access during pick-up and drop-off, as well as being sited so that the replacement building would only be marginally glimpsed from parts of Fore Street near to the entrance gate and does not encroach on the Green Belt or

established woodland. The internal spaces have been arranged to create year group clusters to promote a natural progression of pupils moving through the school, and all classrooms benefit from a direct exit to external areas on the ground level and first floor level, as a result of the courtyards and first floor amenity areas.

The scale of the proposal, whilst larger than the existing building is still very modest with a maximum height of 9.2 metres at two-storeys, tapering to one-storey towards its southern end where it adjoins Coteford Junior School. This would be in keeping with the prevailing heights of the nearby residential properties, but with a flat roof design to limit its overall scale and ensure the building sits below the established canopy level, whilst achieving an uplift in usable floorspace.

The proposed building would be finished in a pale buff brick, with coloured window panels placed intermittently across the elevations around the windows to provide an element of architectural interest. This results in a relatively simple and muted, but nonetheless cohesive appearance which blends relatively well into the surrounding landscape and is considered appropriate for this site.

Overall, on the basis of the above, it is considered that the proposal would be of an acceptable design which would provide a functional and fit for purpose school and would generally comply with Policy D3 of the London Plan and Policies BE1 and DMHB 11 of the Hillingdon Local Plan.

7.08 Impact on neighbours

Policy DMHB 11 of the Hillingdon Local Plan: Development Management Policies and Policy BE1 of the Hillingdon Local Plan: Strategic Policies both seek to ensure that new development does not adversely impact on the residential amenity of neighbouring properties. The supporting text to Policy DMHB 11 sets out that sufficient privacy for existing residents will be protected by resisting proposals which would introduce an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. To maintain existing levels of privacy, a minimum separation distance of 21 metres between facing habitable room windows of habitable rooms will normally be required, and in some locations, for example where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary. Moreover, new development proposals must carefully consider their layout and massing in order to ensure development does not result in a significantly increased sense of enclosure or loss of outlook.

It is considered that the proposed development would not have a significant impact on the amenity of nearby properties in terms of a loss of natural light, outlook or privacy or because of the increased intensity of use on-site.

The proposed building seeks to occupy a very similar footprint to the existing building and is sited deep within the western half of the application site, a very significant distance away from the nearest residential properties which are located on Grangewood Close, Fore Street and Wood Rise to the south-east. As a result of the proposed height of 9.2 (an increase of 2.4 metres), coupled with the high separation distances to the nearest residential properties, there would be no impact on the amenity of these houses.

7.09 Living conditions for future occupiers

Not relevant to this application.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Policy T1 of the London Plan (Strategic approach to transport) seeks development

proposals to facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

In addition, Policy T2 of the London Plan (Healthy Streets) requires development proposals to demonstrate how they will reduce the dominance of vehicles on London's streets whether stationary or moving, be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

Moreover, Policy T4 of the London Plan (Assessing and mitigating transport impacts) sets out that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. When required, transport assessments or statements should be submitted with proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Policy T4 further explains that where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

Policy T5 of the London Plan (Cycling) sets out that proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. As such, developments should provide cycle parking at least in accordance with the minimum standards, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

Policy T6 of the London Plan (Car Parking) states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free developments have no general parking but should still provide disabled persons parking. The maximum car parking standards, disabled persons parking, and the provision of electric or other Ultra-Low Emission vehicles are set out in Policy T6.1 to Policy T6.5, however it should be noted that there are no specific car parking standards for care homes, other than for wheelchair accessible spaces.

As the proposed development would increase the number of students and staff, there is a commensurate increase in on-site parking, being mindful at the same time that schemes should seek to promote sustainable and active travel as much as possible. 110 car parking spaces are proposed (including 38 for Coteford Junior School who share the wider site), to comprise 107 standard bays and 3 wheelchair accessible bays (an increase of 38). 6 of these spaces would be provided with active electric vehicle charge points. Provision has also been made for minibuses that will drop-off/pickup students, including 8 dedicated bays near to the proposed main entrance, allowing waiting minibuses to queue in order within

the site without obstructing traffic. This is in addition to 3 permanent parking bays for use by the school's own minibuses. Additionally, 40 long stay and 4 short stay cycle parking spaces are proposed.

The proposal would host up to 130 full time members of staff and 180 students, at maximum occupancy and the site has a Public Transport Accessibility Level (PTAL) of 1a, on a scale of 0-6 where 0 is the worst and 6 is the best, indicating that there would be some reliance on the private car. In this regard, almost all students would arrive and leave by minibus and onsite parking would largely be for use by staff.

In support of the application, a Transport Statement (November 2022) has been submitted, which includes predicted trip generation information by referring to the TRICS database, which is generally appropriate, however, as noted within the Transport Statement itself, the sites selected for comparison are not suitable as none are SEN schools.

There are no established parking standards for SEN schools within the London Plan or Hillingdon Local Plan, and as such, comments from the Highways Officer set out that a comparison with Moorcroft School within the borough is more appropriate, which is a secondary school for students between 11 and 19 years old with severe learning disabilities (SLD), profound and multiple learning disabilities (PMLD) and autistic spectrum disorders (ASD). Based on the Moorcroft School comparison, the Highways Officer considers that a parking to staff ratio of 0.84 would be acceptable in this instance and is unlikely to lead to overspill parking on the surrounding residential roads, provided sustainable and active travel is properly promoted through the adoption of a Travel Plan, which would be secured as a planning obligation. The Highways Officer has reviewed the submitted travel plan and considers that greater emphasis could have been placed upon the use of car sharing for members of staff, since the main mode travel to the site will be via cars as a result of the low PTAL. Furthermore, it is found that the idea of promotion of measures will not always guarantee uptake by staff and more could be done to encourage these measures through the use of genuine incentives.

The development of the school will see the on-site cycle parking increased to 40no. long-stay and 4no. short-stay for visitors, this will be an increase from the existing 30no. on-site cycle spaces. As earlier mentioned, the cycle provision has been based upon higher staffing levels than expected for a school of this size, and this is welcomed as way to ensure cycle uptake is not constrained by lack of available spaces.

The proposed 6 active electric vehicle charging points, when coupled with a 20% increase of charging points year on year over a five-year period, is anticipated to be in line with electric vehicle ownership increase. Hillingdon Local Plan requirements for electric charging points are set out in the Hillingdon Local Plan as 5% active and 5% passive (which would amount to 6 active and 5 passive charging points), however, the Highways Officer considers 6 active with a 20% annual increase to be sufficient to meet demand.

On the basis of the above, the proposal is considered acceptable in respect of impacts on the highway network and would provide an acceptable level of parking on site to support the increase maximum occupancy.

7.11 Urban design, access and security

Policy D11 of the London Plan (Safety, security and resilience to emergency) sets out that boroughs should work with the Metropolitan Police Service's 'Design Out Crime' Officers to identify the community safety needs and necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Proposals should seek to maximise

building resilience and minimise potential physical risks, and should include measures to design out crime that deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. Measures to design out crime, including counter terrorism measures, should be integral to proposals, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police.

Policy BE1 of the Hillingdon Local Plan: Strategic Policies (Built Environment) encourages the creation of safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson, having regard to Secure by Design standards.

As such, a condition requiring the proposed development to achieve secured by design accreditation in consultation with the Metropolitan Police, is included within the decision notice, to ensure the proposal meets the requirements of Policy D11 of the London Plan and Policy BE1 of the Hillingdon Local Plan. On this basis, the proposal is considered acceptable in this regard.

7.12 Disabled access

Policy D5 of the London Plan (Inclusive design) sets out that proposals should achieve the highest standards of accessible and inclusive design by providing high quality people focused spaces that are designed to facilitate social interaction and inclusion, be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment, and be able to be entered, used and exited safely, easily and with dignity for all.

The internal layout has been design in close consultation with DfE guidelines, and needs to be safe, secure, and welcoming for the pupils, whilst also ensuring their broad range of needs are met by providing access to high-quality facilities both now and in the future. The accessibility needs of the development have been assessed by the Council's Accessibility Officer, who is satisfied with the proposal subject to an amendment to the number of wheelchair accessible parking bays. Having discussed this with the Highways Officer and the applicant further, it is not possible to increase the number of wheelchair accessible bays without reducing the overall number, and the intended 'universal access' bays would be difficult to manage. Further, a survey of existing staff indicated that only one member of staff requires a larger parking bay and extrapolating this should mean that three bays are sufficient. In any event, if a need for more wheelchair accessible bays arises, these can be added and controlled by a condition for a Parking Design and Management Plan.

On this basis, the proposal is considered to meet accessibility requirements and complies with Policy D5 of the London plan.

7.13 Provision of affordable & special needs housing

Not relevant to this application.

7.14 Trees, landscaping and Ecology

Policy G5 of the London Plan (Urban Greening) requires major proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping and trees. Policy G6 of the London Plan (Biodiversity and access to nature) further sets out that Sites of Importance for Nature Conservation (SINCs) should be protected and aim to secure net biodiversity gain from major developments. The supporting text to Policy G6 also sets out that sites with a formal European or national designation (including Sites of

Special Scientific Interest and National Nature Reserves) are protected by legislation, which places legal provisions to ensure these sites are not harmed by development and a duty to consult Natural England on proposals that might affect these sites. Biodiversity net gain is an approach to development that leaves biodiversity in a better state than before. This means that where biodiversity is lost as a result of a development, the compensation provided should be of an overall greater biodiversity value than that which is lost, however, this approach does not change the fact that losses should be avoided, and biodiversity offsetting is the option of last resort.

Additionally, Policy G7 of the London Plan (Trees and Woodlands) seeks to protect and maintain London's urban forest and woodlands, whilst new trees should be planted in appropriate locations to increase the extent of London under the canopy of trees. In practice, this means that wherever possible, existing trees of value should be retained and if permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the trees to be removed.

At a borough level, Policy EM7 of the Hillingdon Local Plan Part 1 (Biodiversity and Geological Conservation) sets out that Hillingdon's biodiversity will be preserved and enhanced, resisting adverse impacts particularly to SINCs and the provision of biodiversity improvements from all feasible developments. In addition, Policy DMEI 7 of the London Plan (Biodiversity Protection and Enhancement) requires the design and layout of new development to retain and enhance any existing features of biodiversity or geological value within the site, and where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where a development site is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement. Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated for, will normally be refused.

In support of the application a Preliminary Ecological Appraisal, Biodiversity Net Gain Report, Bat Survey, and a document titled 'Response on Biodiversity Matters (2145/APP/2022/3534)' have been submitted.

All of the application site falls within the Ruislip Woods SINC, whilst the eastern part of the site falls within the Ruislip Woods SSSI, and the site borders a National Nature Reserve on three sides, and consequently Natural England have been consulted on this application. Following amendments to the scheme to move the proposed substation from within the SSSI boundary to elsewhere within the site, and confirmation that the only development inside the SSSI will be the erection of a replacement fence using the same post holes, Natural England are satisfied that the proposed impact to the SSSI would be negligible, and have requested a condition controlling the impacts of construction, which has been included.

The Preliminary Ecological Appraisal outlines that a thorough desktop assessment has been undertaken, identifying deciduous woodland as the nearest priority habitat (which falls within and around the edges of the site), and ancient woodland approximately 150 metres from the school boundary. The largest area of habitat on-site consists of broadleaved semi-natural woodland, surrounding the school to the west, north and east, contiguous with Ruislip Wood and two smaller parcels southeast of the school building bisected by the school access roads.

The woodland is dominated by oak and hornbeam with a limited understorey of hawthorn, holly, yew and bramble, and does not appear to have been actively managed and consequently has a dense canopy which appears to limit the potential for a diverse understorey to become established. Moreover, whilst there are numerous notable and protected species in the area, none of these species have previously been recorded within the site. Subsequently a survey was undertaken, including a separate bat survey, which identified that at least five species of bat use the site to forage or commute over, with three bat roosts (and a possible fourth) within the roof voids of the main school building. There are also two trees with bat roost potential (one of high and one of low potential).

Given that bat roosts are present on site, and these would need to be removed to facilitate development, avoiding all harm is unavoidable if the development is to be implemented, and mitigation will be required to limit this harm as much as possible and enhance biodiversity in other ways. This includes a maternity colony of long-eared brown bats of up to 7 bats, alongside common soprano and pipistrelle roosts.

The Bat Survey indicates that a further activity survey will need to be undertaken immediately prior to demolition, when demolition is proposed between March and October (as is the case here), to confirm the presence or absence of bats. Demolition will also need to be timed to minimise the impact on bats, with removal of the roof and other features to be completed before the end of May, and removal of the roof will not be permitted between the months of June, July or August. This shall all be monitored by an Ecological Clerk of Works, who shall be a licensed ecologist, to ensure the correct procedures are followed. Other recommendations of the Bat Survey include a replacement void roost, which would be constructed on-site, prior to demolition, roof membrane specifications within the new building, and sensitive lighting, in accordance with the Bat Conservation Trust and Institution of Lighting Professionals Guidance Note "Bats and Artificial Lighting in the UK".

It should be noted that a Bat Licence, issued by Natural England under a separate legislative regime, would be required before development commences. However, before a local planning authority issue a decision affecting bats, it must be confident that Natural England are likely to issue a subsequent licence, make sure any conditions relating to mitigation do not conflict with the requirements of a bat mitigation licence and set out clearly that there is a strong need for the development which outweighs the identified harm

The document titled 'Response on Biodiversity Matters (2145/APP/2022/3534)' outlines that the applicant confirms to follow all the recommended actions within the Bat Survey and that they will submit a bat licence to Natural England if permission is granted to allow them to implement their permission lawfully. This response further commits to the provision of a new colony bat roost box to be included in (or affixed to) the new building when it is completed, together with an enhancement of the woodland within the school site to increase its structural and floristic diversity, which in turn would increase its value as part of the foraging resource for local bat populations. This is expanded on further within the Biodiversity Net Gain Report which confirms there would be an overall betterment of habitats within the site.

Whilst the scheme includes the removal of a significant number of trees, the council's Tree Officer has reviewed the scheme and has no objections to the approval of the application, subject to the implementation of the submitted tree protection plans and a condition for tree replacements on at least a 1:1 basis.

It is also considered that a rigorous method statement to include arboricultural supervision would be required for the demolition and construction phase with a focus on protecting the trees on the bank to the north of the building as well as how materials will be brought onto site, and details of this would be secured by way of condition.

Overall, based on the above considerations, it is agreed that the proposal would be harmful to existing bat roosts, however measures can be secured by condition to ensure that any harm is minimised, and mitigated through the creation of alternative roosts. There is, in any event, an overriding need to approve this application having regard to its predicted crucial role the enlarged school would play in ensuring that the local authority can provide enough school places, specifically SEN provision, for its residents. It is further recognised that despite the harm to bats, there would be an on-site biodiversity net gain (in terms of habitat creation), which would also be secured by way of condition, and therefore the proposal is considered to generally conform with the requirements of policies G5, G6 and G7 of the London Plan, and Policies EM7 and DMEI 7 of the Hillingdon Local Plan.

7.15 Sustainable waste management

Policy EM11 of the Hillingdon Local Plan: Strategic Policies (Sustainable Waste Management) states that the council will aim to reduce the amount of waste produced in the borough. To achieve this, the council will require all new developments to address waste management at all stages of a development's life from design and construction through to the end use and activity on site.

The bin store is proposed to remain in the same location and become a more permanent structure, and tracked vehicle movements satisfactorily demonstrate that a refuse vehicle could conveniently enter the site, collect the refuse and recycling, and leave the site, all in forward gear. The bin store shown on the plans appears to be sufficient to accommodate the 1 x 1100 litre bin for general waste, 1 x 1100 litre bin for recycling and 1 x 240 litre bin for food which would be needed to support this scheme, based on a ratio of 1 bin of each type for every 250 pupils. Precise details of the bin store's appearance and positioning would be secured by way of condition, requiring further details of additional space for the storage of bulky items such as broken tables, chairs and equipment that cannot be disposed of within the waste containers.

7.16 Renewable energy / Sustainability

Policy SI 2 of the London Plan (Minimising greenhouse gas emissions) states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy, placing an additional requirement to monitor emissions beyond implementation to determine the effectiveness of the mitigation:

1. be lean: use less energy and manage demand during operation
2. be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
3. be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
4. be seen: monitor, verify and report on energy performance.

Policy SI 2 sets targets for carbon dioxide emission reductions in buildings. These are expressed as minimum improvements over the Target Emission Rate (TER) outlined in national building regulations. The current target for residential and non-residential buildings is zero carbon beyond the current Building Regulations Part L 2013.

Major development proposals should include a detailed energy strategy to demonstrate

how the zero-carbon target will be met within the framework of the energy hierarchy and how a minimum on-site reduction of at least 35% beyond Building Regulations will be achieved. Residential development should achieve 10%, and non-residential development should achieve 15% through energy efficiency measures alone. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either through a cash in lieu contribution to the borough's carbon offset fund or off-site, provided that an alternative proposal is identified and delivery is certain.

Moreover, major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations (i.e. unregulated emissions).

In addition, Policy SI 3 of the London Plan (Energy Infrastructure) states that all major development proposals shall explore opportunities to maximise the use of on-site renewable energy generation and incorporate demand-side response measures.

Policy EM1 of the Hillingdon Local Plan: Strategic Policies (Climate Change Adaptation and Mitigation) sets out that the installation of renewable energy will be encouraged for all new developments.

In support of the application, an Energy Strategy Report (September 2022) has been submitted which outlines that the proposal has been designed to meet the requirements of the DfE Output Specification which requires the project to achieve Net-Zero Carbon in operation, and that the energy strategy for the site follows the London Plan Energy Hierarchy.

However, whilst the Energy Strategy discusses the requirements of the DfE guidance, there is comparatively little information against London Plan policies including a comparison of regulated emissions against Part L of the Building Regulations. Consequently, whilst a carbon offset contribution is proposed by the applicant, it is not possible to reliably secure this level of contribution as a planning obligation. However, comments from the council's Energy Officer indicate that the poor standard of the Energy Assessment would not warrant a refusal as the application is not particularly unusual or unique (in terms of energy consumption) and it is reasonably foreseeable that a development could be policy compliant and achieve zero carbon standards through a combination of onsite and offsite measures, which should be secured as a condition and planning obligation which work together in tandem.

On the basis that the non-compliance with Policy SI 2 and SI 3 of the London Plan can be secured through a combination of conditions and planning obligations, and PPG advises that matters which can be controlled in this manner should be used instead of issuing a refusal, it is considered that compliance with these policies would be possible, and is more appropriate given the overriding weight given in support of providing additional SEN provision within the borough.

7.17 Flooding or Drainage Issues

Policy SI 12 of the London Plan (Flood risk management) sets out that flood risk across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities and developers where relevant. Proposals should further ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses. Development

proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading.

In addition, Policy SI 13 of the London Plan (Sustainable drainage) sets out that proposal should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

Moreover, drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

Policy EM6 of the Hillingdon Local Plan: Strategic Policies (Flood Risk Management) encourages development to be sited away from the areas of highest flood risk (Flood Zones 2 and 3), and all development will be required to use sustainable urban drainage systems (SUDS).

The application site falls within Flood Zone 1, and whilst near a Critical Drainage Area, the site is not identified as at risk of either fluvial or surface water flooding, or affecting the nearby drainage areas. In support of the application, a Flood Risk Assessment and Drainage Strategy has been submitted, which sets out that the proposed scheme will limit discharge to the 1 in 1-year greenfield return period by using a vortex flow control device, limiting the discharge rate from site to 2.9 l/s, whilst excess surface water will be managed using a below ground attenuation tank, and surface and foul water will discharge to separate surface and foul water Thames Water sewers.

Further information would be required at detailed design stage, to be secured through an appropriately worded condition to properly manage drainage for the lifetime of the development, and compliance with Policies SI 12 and SI 13 of the London Plan can be achieved this way.

7.18 Noise or Air Quality Issues

NOISE

Policy D14 of the London Plan (Noise) states that new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses. Development proposals should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances with necessary and appropriate provisions including ongoing and future management responsibilities, and proposals should seek to separate new noise-sensitive development from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.

Policy D13 of the London Plan (Agent of Change) sets out that proposals should mitigate and minimise the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses, improving and enhancing the acoustic environment and promoting appropriate soundscapes. Proposals should first seek to separate new noise-sensitive development from major noise sources through the use of distance, screening, layout, orientation, uses and materials, in preference to sole reliance on sound insulation. Where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic

design principles, promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

It is generally accepted that noise emanating from residential properties is lower than commercial premises, and industrial uses are associated with the highest noise profile.

Policy EM8 of the Hillingdon Local Plan: Strategic Policies (Land, Water, Air and Noise) states the council will promote the maximum possible reduction in noise levels and will minimise the number of people potentially affected by new developments. As such, the council will seek to ensure that noise sensitive development and noise generating development are only allowed if noise impacts can be adequately controlled and mitigated, and requires all development to protect both existing and new sensitive receptors.

In support of the application, a Planning Noise Assessment (November 2022) has been submitted, which outlines that the proposed mechanical plant and their locations in relation to the nearest noise sensitive receptors have been mapped, including calculations to assess the resulting Rating Levels at the nearest noise sensitive receptors in accordance with BS 4142., in addition to noise from an active MUGA. The assessment predicts that plant noise levels are considered to result in a low impact in line with established guidance and that the impact from the MUGA during the daytime would be negligible and below background levels. This report has been reviewed by the councils' Noise Officer who raises no objections, and on this basis, the proposal is considered to have an acceptable impact in terms of noise and would comply with Policy D14 of the London Plan And Policy EM8 of the Hillingdon Local Plan in this respect.

AIR QUALITY

Policy SI 1 of the London Plan (Improving air quality) states that proposals should not lead to further deterioration of existing poor air quality or create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits, so as not to create unacceptable risk of high levels of exposure to poor air quality.

As such, as a minimum, proposals should be at least Air Quality Neutral and should use design solutions to prevent or minimise increased exposure to existing air pollution, whilst making provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.

Major development proposals must be submitted with an Air Quality Assessment. Proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.

Policy EM8 of the Hillingdon Local Plan: Strategic Policies (Land, Water, Air and Noise) requires all developments to not result in the deterioration of local air quality. In addition, all major developments within Air Quality Management Areas (AQMAs) should be air quality neutral whilst actively contributing to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels.

In accordance with Policy SI 1 of the London Plan and Policy EM8 of the Hillingdon Local

Plan, developments need to be neutral as minimum and positive in Focus Areas, contributing to the reduction of air pollutant emissions in these sensitive locations. New developments within the London Borough of Hillingdon are expected to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor, namely Focus Areas.

Furthermore, Policy DMEI 14 of the Hillingdon Local Plan: Development Management Policies (Air Quality) requires active financial contributions towards the continued improvement of air quality, especially within the Air Quality Management Areas and Focus Areas.

The proposed development is located within the borough's AQMA, and is approximately 500 metres from the Eastcote Village AQFA, and is likely to be associated with additional traffic emissions which will add to current poor air quality in the area. Proposals are required to improve air quality within Focus Areas.

As set out by the council's Air Quality Officer the proposal would be air quality neutral and air quality positive for transport emissions, therefore meeting both London Plan and Hillingdon Local Plan requirements. The conditions recommended by the air quality officer have been incorporated, and on this basis, the proposal is considered to be acceptable in respect of impacts on air quality.

7.19 Comments on Public Consultations

Letters dated 25-11-22 were sent to 180 nearby properties, including properties on Fore Street, Coniston Gardens, Maybank Gardens, Wentworth Drive, Grangewood Close, Wood Rise, Dormywood, and Park Avenue. Additionally, one site notice was displayed outside the site on 20-12-22, and a press notice was displayed in a local newspaper on 30-11-22.

Eight responses (three objections, four in support and one neither objecting nor supporting) were received following public notification, raising the following material considerations:

- Proposal will create much needed places for pupils with severe learning disabilities
- Current school is no longer fit for purpose and new development will be of a higher quality
- Increased traffic from construction and once operational
- Worsened pedestrian safety
- Increase in surface water flooding

7.20 Planning obligations

Policy DF1 of the London Plan (Delivery of the Plan and Planning Obligations) requires proposals to provide infrastructure and meet the other relevant policy requirements necessary to ensure that they are sustainable and support delivery of the council's strategic objectives. In general, the London Plan sets out that priority should first be applied to securing affordable housing and necessary public transport improvements, and following this, delivering necessary health and education infrastructure, whilst recognising the importance of securing affordable workspace, and culture and leisure facilities.

At a borough level, Policy DMCI 7 of the Hillingdon Local Plan: Development Management Policies (Planning Obligations and Community Infrastructure Levy) sets out that planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it, to ensure that development is sustainable in accordance with the NPPF (2021). Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL) and through planning obligations.

Specifically, planning obligations are used to secure the provision of affordable housing in relation to residential development schemes, and where a development has infrastructure needs that are not addressed through CIL to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal. Applications which fail to include appropriate planning obligations to make the proposal acceptable will be refused. Planning obligations run with the land, are legally binding and enforceable.

The Community Infrastructure Levy Regulations, the NPPF and Planning Practice Guidance have put three tests on the use of planning obligations into law. In this regard, planning obligations must meet the following tests to be lawful:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonable related in scale and kind to the development.

The following Heads of Terms are proposed, to be secured through a section 106 agreement to either ensure policy compliance or to address deficiencies in the scheme which could not be addressed through amendments to the plans:

- A full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include targets for sustainable travel arrangements, effective measures for the ongoing monitoring of the Travel Plan, and a commitment to delivering the Travel Plan objectives. A £20,000 Travel Plan bond is also to be secured;
- Details shall be submitted for a Construction and Employment Training scheme in accordance with the Council Planning Obligations SPD with the preference being for an in-kind, on-site scheme to be delivered;
- A carbon offsetting sum based on an Updated Energy Strategy to be submitted to discharge condition 8, with the offset calculation based on £95 per tonne of CO₂ over a 30 year period.
- A financial contribution equal to 5% of the total cash contributions, for Project Monitoring and Management.

As a school, the proposed development would not be CIL liable.

7.21 Expediency of enforcement action

N/A.

7.22 Other Issues

LAND CONTAMINATION

The Phase 1 Geo-Environmental Desk Study Report (March 2018) submitted in support of the application indicates a low to moderate possibility that harm could arise to a designated receptor from identified pollutants and further ground investigations are recommended to assess the geo-environmental constraints identified on site during the preliminary study.

As set out by the council's Land Contamination Officer, the submitted report provides suitable details from a phase 1 Desk study which includes an initial conceptual site model and preliminary risk assessment. The report indicates made ground materials, associated with the development of the existing buildings and earlier local earthworks, may be present at the site. The recommended conditions would be secured by condition and on this basis the proposal would not pose an unacceptable contamination risk.

FIRE STRATEGY

In the interests of fire safety and to ensure the safety of all building users, Policy D12 of the London Plan states that all proposals must achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside spaces for fire appliances to be positioned on, provide suitable access and equipment for firefighting which is appropriate for the size and use of the development, and provides spaces which are appropriate for use as an evacuation assembly point.

Buildings should be designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire by being constructed in an appropriate way to minimise the risk of fire spread. This should include appropriate fire alarm systems, passive and active fire safety measures, suitable and convenient means of escape and an associated robust evacuation strategy which can be periodically updated and published, and which all occupants can have confidence in. These measures should be set out in a Fire Strategy, prepared by a suitably qualified fire engineer.

A Fire Safety Strategy (27-10-22) has been submitted in support of this application to support the design team in progressing the detailed fire safety provisions for the proposal. It provides an overview of the means of escape, warning procedures, material specifications and long-term management objectives, which is sufficient to allow approval. A full detailed fire strategy would be secured by way of condition.

On this basis, the proposal is considered to meet the requirements of Policy D12 of the London Plan.

8. Observations of the Borough Solicitor

General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probity in Planning, 2009.

Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The

obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

9. Observations of the Director of Finance

Not applicable

10. CONCLUSION

The proposed demolition and erection of a replacement school to provide Special Educational Need provision is considered an acceptable use for the site, being a continuation of the existing use, and is wholly supported in principle recognising the significant weight which should be given in favour of additional school places, recognised at a national level through the NPPF and at a local level through the comments from the Council's School Place Planning Officer which set out that a larger SEN school is crucial to meeting the council's statutory duty to provide a sufficient number of school places within the borough.

The overall scale and design of the proposal is acceptable and would retain a modest footprint and massing, appearing contextually appropriate for the surrounding natural and built environment and without encroaching on the SSSI or the SAM with the exception of a replacement fence, for which further details would be secured by condition. Additionally, because of its location and distance from the nearest residential properties, any impacts to residential amenity would be low to negligible.

There are numerous trees which would be removed as a result of the proposed development, and there would be harm to bats through the removal of multiple existing bat roosts within the building. It is considered that this harm has been mitigated as best as possible, with further details of this mitigation to be provided and secured through a condition, and the scheme as a whole delivers a biodiversity net gain.

The levels and location of parking around the site is considered acceptable for this site, recognising that SEN schools typically have more staff per pupil than most state schools and the PTAL of the site is relatively low, and therefore there will be some reliance on the private car. Measures to increase sustainable and active travel would be controlled through a Travel Plan to be secured as an obligation, alongside a gradual uplift in active electric vehicle charging points.

Overall, the proposal would comply with development plan policies and is recommended for approval, subject to the conditions and obligations set out in this report.

11. Reference Documents

London Plan (2021)

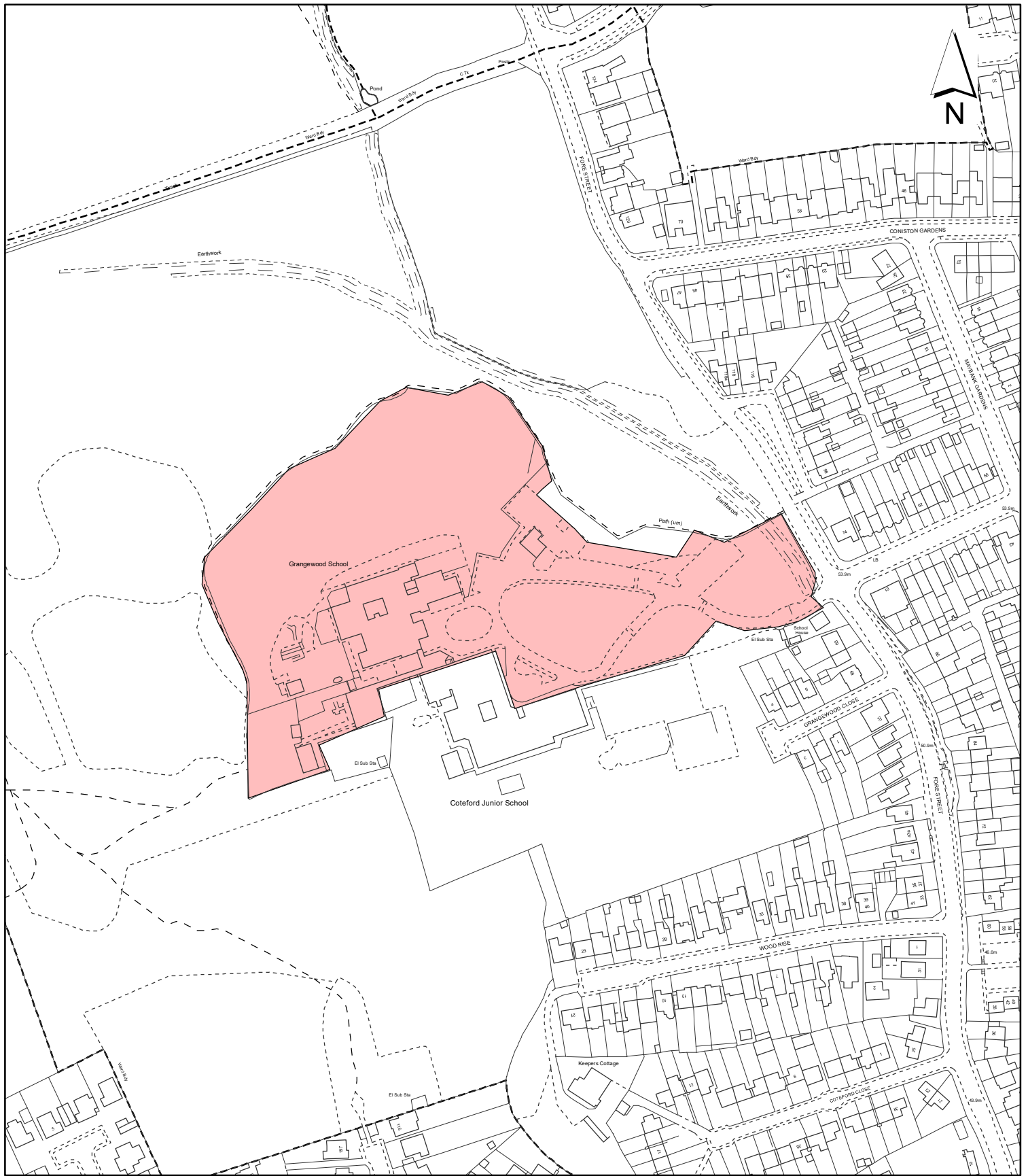
Hillingdon Local Plan: Strategic Policies (2012)

Hillingdon Local Plan: Development Management Policies (2020)

National Planning Policy Framework (NPPF) (2021)

Contact Officer: Andrew Thornley

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Notes:

 Site boundary

For identification purposes only.
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Site Address:

Grangewood School

LONDON BOROUGH OF HILLINGDON
Residents Services
Planning Section

Civic Centre, Uxbridge, Middx. UB8 1UW
 Telephone No.: Uxbridge 01895 250111

Planning Application Ref:
2145/APP/2022/3534

Scale:
1:2,500

Planning Committee:
Major

Date:
January 2023



HILLINGDON
 LONDON