

Report of the Head of Planning, Transportation and Regeneration

Address HILLINGDON MANOR SCHOOL HARLINGTON ROAD HILLINGDON

Development: Change of use of open space from (Use Class Sui Generis) and the construction of two buildings and a cafe in association with the school (Use Class D1) with associated access, car parking and landscaping

LBH Ref Nos: 3043/APP/2019/1788

Drawing Nos: 1594-01 B
Arboricultural Impact Assessment
Ecological Impact Assessment
Proposed Visual
1594-02 C
1594-03 C
Planning, Design and Access Statement
Planning Statement
Phase I and Phase II Geo-environmental Site Investigation
Preliminary Ecological Appraisal
Covering Letter (Ref: A110762/IB)

Date Plans Received: 28/05/2019 **Date(s) of Amendment(s):** 31/07/2019
Date Application Valid: 28/05/2019 30/05/2019
28/05/2019
11/10/2019

1. SUMMARY

This is an application for the erection of three single storey buildings, two of which would be used as classrooms and the third building would be used as an ancillary cafe. Immediately east of the proposed cafe, an area of hard standing to accommodate 12 car parking spaces with associated access is proposed within an open field that is situated entirely within the Green Belt. The proposal is inappropriate development within the Green Belt requiring very special circumstances to be demonstrated. The applicant has failed to satisfactorily demonstrate that there are very special circumstances to outweigh harm to the Green Belt.

The development would also harm the setting of a Grade II Listed Building by encroaching upon a historic field boundary. This application is recommended for refusal for the reasons outlined within this report.

2. RECOMMENDATION

REFUSAL for the following reasons:

1 NON2 Non Standard reason for refusal

The proposed development represents inappropriate development within the Green Belt which is harmful by definition. There are no very special circumstances provided or which are evident which either singularly or cumulatively justify the development which would overcome the presumption against inappropriate development in the Green Belt. The development is therefore harmful to the Green Belt, contrary to the National Planning Policy Framework, Policy 7.16 of the London Plan (2016), Policy EM2 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policies OL1 and OL4 of the

Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and Policy DMEI 4 and DMCI 1A of the emerging Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

2 NON2 Non Standard reason for refusal

The proposed development, by reason of its siting, would result in the loss of a historic field boundary which would be detrimental to the setting of the Grade II listed building contrary to Policies BE1 and HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policy BE10 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012), Policies DMHB 1 and DMHB 2 of the emerging Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019) Policy 7.8 of the London Plan (2016) and the NPPF.

INFORMATIVES

1 I52 Compulsory Informative (1)

The decision to REFUSE 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 REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) as incorporated into the Hillingdon Local Plan (2012) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

OL4	Green Belt - replacement or extension of buildings
BE10	Proposals detrimental to the setting of a listed building
BE13	New development must harmonise with the existing street scene.
BE15	Alterations and extensions to existing buildings
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
OE1	Protection of the character and amenities of surrounding properties and the local area
R10	Proposals for new meeting halls and buildings for education, social, community and health services
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMHB 1	Heritage Assets
DMHB 2	Listed Buildings
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping

LPP 3.18	(2016) Education Facilities
LPP 7.16	(2016) Green Belt
LPP 7.4	(2016) Local character
LPP 7.8	(2016) Heritage assets and archaeology
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land

3 159 Councils Local Plan : Part 1 - Strategic Policies

On this decision notice policies from the Councils Local Plan: Part 1 - Strategic Policies appear first, then relevant saved policies (referred to as policies from the Hillingdon Unitary Development Plan - Saved Policies September 2007), then London Plan Policies (2016). On the 8th November 2012 Hillingdon's Full Council agreed the adoption of the Councils Local Plan: Part 1 - Strategic Policies. Appendix 5 of this explains which saved policies from the old Unitary Development (which was subject to a direction from Secretary of State in September 2007 agreeing that the policies were 'saved') still apply for development control decisions.

3. CONSIDERATIONS

3.1 Site and Locality

Hillingdon Manor School occupies an irregularly shaped plot located on the south west side of Harlington Road. It accommodates a mainly single-storey school building, a number of mobile classroom units, a playground, car parking and ancillary development. The buildings and playgrounds are located towards the rear (west) of the site, with car parking to the east and south. Hillingdon Manor School opened in 1999 as an independent school for children and young people with autism.

The application site is situated to the north of the existing site which is currently occupied by privately owned fields. A single-storey building adjoins the southern most corner of the school site. Mencap also use buildings to the east of the school car park and south of its access.

There are four Grade II Listed properties know as Vine House, The Lawns, Stable and Coach House building to the north of Moorcroft and Moorcroft lie to the south of the site.

The entire site and its surrounds fall within the Green Belt as designated in the Hillingdon Local Plan and the site has a very low Public Transport Accessibility Level of 2.

3.2 Proposed Scheme

The proposal seeks the change of use of existing open space and the erection of two modular classroom blocks and a forestry school cafe following the removal of an existing classroom block.

Two new buildings are proposed to accommodate two classrooms in each block that will allow for the intake of 15 additional post-16 pupils with learning difficulties.

A separate building will house the Forest Schools cafe. This facility will enable the delivery of BTEC/ASDAN hospitality and catering courses for learners with Adult Social Care (ASC) and additional needs. The building will contain a kitchen and dining area in a open plan cafe style layout. The cafe will serve as an internal enterprise for staff and students and other community groups (by invitation only). The cafe would only be used ancillary to the school

and not as a standalone cafe.

Overall the built footprint would increase by approximately 330 sq.m and volume of 1,155 m3. New access and decking is proposed leading to the classrooms and the cafe. A new area of hardstanding is proposed to be provided to facilitate a new car park immediately to the east of the new cafe which comprises 12 car parking spaces. These spaces will replace the unmarked parking which currently takes place on the main access road (though it is to be noted that this is only informal car parking by staff and visitors to the school, the car parking spaces along the main access road is not something that has been agreed by the council as part of previous consents). A footway is also proposed to enable pedestrians and wheelchair accessible users to navigate to the entrance of the existing and proposed school.

A horticultural area is proposed adjacent to the new classrooms. This will allow the growing of various vegetables in seven rotated beds and 18 perennial raised vegetable beds. Fruit vines are also proposed to be planted. A limited number of temporary, small-scale, non-fixed polytunnels will be used in this area, together with a small chicken run, composting area and potting shed. The fruit and vegetable crops grown will be used in school meal provision, in the cafe and for sale to parents and staff.

3.3 Relevant Planning History

3043/APP/2001/1392 Manor School, Moorcroft Complex Harlington Road Hillingdon
ERECTION OF A PORTACABIN FOR USE AS OFFICE

Decision: 14-09-2001 ALT

3043/APP/2003/1997 The Moorcroft Complex Harlington Road Hillingdon
ERECTION OF A TEMPORARY SINGLE STOREY BUILDING, FORMATION OF NEW PLAY
AREA AND FOUR ADDITIONAL CAR PARKING SPACES

Decision: 26-11-2003 Approved

3043/APP/2008/1077 Hillingdon Manor Lower School Harlington Road Hillingdon
RETENTION OF A SINGLE STOREY PORTACABIN FOR USE AS AN ANCILLARY OFFICE IN
CONNECTION WITH THE EDUCATIONAL USE OF THE SITE

Decision: 24-12-2008 Approved

3043/APP/2008/2511 Hillingdon Manor School Harlington Road Hillingdon
Retention of a single storey detached classroom block.

Decision: 16-10-2012 NFA

3043/APP/2009/673 Hillingdon Manor School Harlington Road Hillingdon
Additional classroom block, new entrance and reception area, alteration to elevations and
relocation of mobile classroom.

Decision: 29-07-2009 Approved

3043/APP/2009/782 Hillingdon Manor School Harlington Road Hillingdon

Attached garage, involving demolition of existing detached garage.

Decision: 30-06-2009 Approved

3043/APP/2012/1784 Hillingdon Manor Middle School Harlington Road Hillingdon

Erection of 2 new modular classroom buildings, re-organisation of existing modular buildings and creation of a link corridor involving removal of 2 existing modular classroom buildings within rear courtyard and car park.

Decision: 19-02-2013 Approved

3043/APP/2016/78 Moorcroft Harlington Road Hillingdon

Retention of existing courtyard terrace comprising units 34-37, Moorcroft (Application for a Certificate of Lawful Development for an Existing Development)

Decision: 20-05-2016 Approved

3043/APP/2017/1365 Hillingdon Manor Secondary School Harlington Road Hillingdon

Alterations and refurbishment of existing school frontage

Decision: 07-06-2017 Approved

3043/BN/94/0843 Moorcroft School Harlington Road Hillingdon

Erection of a single mobile classroom unit

Decision: 13-07-1994 ALT

Comment on Relevant Planning History

There is extensive planning history relating to this site, the most recent and relevant is listed above.

RELEVANT HISTORY OF HILLINGDON MANOR SCHOOL

In 1994, the application site was operated by Moorcroft School which was given planning permission under application ref: 49008/94/0561 to provide a single storey secondary school for up to 75 children with special needs on a site in Bramble Close, Uxbridge.

Upon their departure, the Hillingdon Manor School opened in September 1999. The current school opened as an independent day school for 40 pupils between the ages of 3 to 19 years with a diagnosis of Asperger's syndrome, high functioning autism and/or semantic-pragmatic disorder. According to the the Inspector's report, pupils were being placed at the school from 14 local authorities including Barnet, Enfield, Sutton, Hampshire and Richmond.

A review of the planning history indicates that planning permission was granted under application ref: 866/APP/2009/1884 for the change of use from Class B1 (Business) to

Class D1 (Non-Residential Institution) for use as a specialist educational day centre, including re-siting of existing garden sheds and new fencing to rear. In the officer's report, it is clear that the capacity at Yiewsley Grange is for upto 50 pupils. The officer's report also noted that at the time of the application, the site on Harlington Road accommodated upto 90 pupils, though it was at capacity.

Under application ref: 866/APP/2012/2880, permission was granted for the retention of play equipment and erection of a temporary new detached timber building (to rear of the Grange building) to provide 2 classrooms and toilets. The officer's report suggests the additional classrooms would increase the Yiewsley Grange capacity to 55 pupils.

Under application ref: 3043/APP/2012/1784 planning permission was granted for the erection of 2 new modular classroom buildings, re-organisation of existing modular buildings and creation of a link corridor involving removal of 2 existing modular classroom buildings within rear courtyard and car park. Within the officer's report, there was proposed to be no increase to the number of pupils.

Since 2012, the impact of more than 123 pupils across Hillingdon Manor School on Harlington Road and Yiewsley Grange has not been assessed. It is noted from a recent OFSTED report dated September 2019 that there are 188 pupils on the school roll.

OFSTED INSPECTOR REPORTS

Listed below are extracts from the Office for Standards in Education (OFSTED) inspection reports which explain how the school has expanded the pupils on its roll. The OFSTED reports which are publicly available were reviewed for information. This information is only included as it gives accurate information regarding pupil numbers and provides an understanding of where pupils come from.

In 2001, the Inspector noted there were 40 pupils from 14 different authorities including students from the Home Counties, Enfield and Hampshire.

In 2005, the Inspector report noted there were 71 pupils in attendance across two schools, though planning permission for the use of Yiewsley Grange was only obtained in 2009.

In July 2008, the Inspector noted there were 90 pupils attending the school across two sites funded by 16 local authorities.

In October 2011, the school's was registered for upto 150 pupils operating from 3 sites with 123 on the roll funded by 17 local authorities.

In March 2015, OFSTED noted the number of pupils's on the school's roll increased to 150.

In January 2017, 175 pupils were on the school roll.

In March 2018, a further inspection was carried out. The Inspector noted "at the time of inspection, there were 178 pupils on the school's roll aged five to 19 years, eight more than the school's maximum registered capacity. 18 local authorities fund pupils' placements.

In January 2019, an additional inspection was carried out noting there were 181 pupils on the school's roll.

In September 2019, a further additional inspection was carried out and it was noted there are 188 pupils on the school's roll.

4. Planning Policies and Standards

Development Plan

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 - Saved UDP Policies (2012)
The London Plan - Consolidated With Alterations (2016)

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Planning Policies

Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

- (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- (c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (Consolidated with Changes July 2019)

The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. This Consolidated version remains under examination with a report by the appointed panel of Inspectors due in Autumn 2019.

The Council's general approach at this stage is to give limited weight to the draft London Plan as a material consideration when deciding planning applications given at this stage of preparation it remains subject to a large number of objections, and could still be subject to significant further change prior to publication.

Proposed Submission Local Plan Part 2 with Main Modifications (March 2019)

The Revised Proposed Submission Local Plan Part 2 (LPP2) documents (Development Management Policies, Site Allocations and Designations and Policies Map Atlas of Changes) were submitted to the Secretary of State for examination in May 2018.

The public examination hearing sessions took place over one week in August 2018.

Following the public hearing sessions, the examining Inspector advised the Council in a Post Hearing Advice Note sent in November 2018 that he considers the LPP2 to be a plan that could be found sound subject to a number of main modifications.

The main modifications proposed by the Inspector were agreed by the Leader of the Council and the Cabinet Member for Planning, Transport and Recycling in March 2019 and were published for public consultation from 27 March to 8 May 2019.

taking para 48 of the NPPF into account, the Council's general approach to the weight which should be afforded to the draft LPP2 will be as follows:

The preparation of the LPP2 is now at a very advanced stage. The public hearing element of the examination process has been concluded and the examining Inspector has indicated that there are no fundamental issues with the LPP2 that would make it incapable of being found sound subject to the main modifications referred to above.

Those policies which are not subject to any proposed main modifications are considered to have had any objections resolved and can be afforded considerable weight. Policies that are subject to main modifications proposed by the Inspector will be given less than considerable weight. The weight to be attributed to those individual policies shall be considered on a case by case basis considering the particular main modification required by the Inspector and the material considerations of the particular planning application, which shall be reflected in the report, as required.

Finally, it is noted that the Inspector has indicated that subject to main modifications the LPP2 is fundamentally sound and therefore consistent with the relevant policies in the NPPF.

Notwithstanding the above, the starting point for determining planning applications remains the adopted policies in the Local Plan: Part 1 Strategic Policies and the Local Plan: Part 2 Saved UDP Policies 2012.

UDP / LDF Designation and London Plan

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
- PT1.HE1 (2012) Heritage

Part 2 Policies:

- OL4 Green Belt - replacement or extension of buildings
- BE10 Proposals detrimental to the setting of a listed building
- BE13 New development must harmonise with the existing street scene.
- BE15 Alterations and extensions to existing buildings
- BE19 New development must improve or complement the character of the area.
- BE20 Daylight and sunlight considerations.
- BE21 Siting, bulk and proximity of new buildings/extensions.

BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
OE1	Protection of the character and amenities of surrounding properties and the local area
R10	Proposals for new meeting halls and buildings for education, social, community and health services
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMHB 1	Heritage Assets
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DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
LPP 3.18	(2016) Education Facilities
LPP 7.16	(2016) Green Belt
LPP 7.4	(2016) Local character
LPP 7.8	(2016) Heritage assets and archaeology
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **15th July 2019**

5.2 Site Notice Expiry Date:- **15th July 2019**

6. Consultations

External Consultees

The application was advertised between 24-06-19 and 15-07-19 and a press notice was issued between 03-07-19 and 24-07-19.

No objections were received to this application. A petition with 80 signatures was received in support of the application noting:

- The proposal would provide 'two new buildings' to expand the specialist learning opportunities for pupils aged 16+.
- The new learning opportunities are for horticultural and Forest School study and key life skills such as food preparation and customer contact.
- Relocation of the whole school is impractical and therefore the co-location of the school is essential
- A new coppice would be planted together with new hedgerow
- The proposal would provide much needed opportunities for students aged 16+. These are opportunities that are not available elsewhere in the Borough.

Internal Consultees

Flood Water Management Officer:

The planning statement proposes the use of a green roof and Sustainable Drainage Systems

(SuDS) within the development. The details of these should be secured by way of a sustainable water management condition. It is recommended that the drainage network is designed alongside detailed landscaping proposals to maximise opportunities for dual landscaping and drainage areas.

Trees and Landscaping Officer:

This site is occupied by a field of unmanaged grassland (formerly used for grazing) to the north of Hillingdon Manor School. The school is privately run for secondary school children with special educational needs (autism). Space on the existing site is limited with inadequate car parking and little usable external space. Staffing ratios are high with 80 staff/100 children. The field (and subject of this application) is privately owned and has been offered to the school on a 20 year lease.

There is a line of hedgerow, with trees separating the school boundary with the field and separating the field from Harlington Road. There are no TPO's or conservation Area designations affecting the site, however, the field is designated Green Belt.

The proposal is supported by a Tree Report, by Helicopter Trees, dated May 2019. 16 individual trees and five groups have been identified and assessed. There are four 'A' grade trees (T5, T6, T7 and G4) and eight 'B' grade trees (T1, T2, T3, T10, T11, T12, T14 and T15) with the remainder category 'C' or 'U'. According to the report and development plan two poor quality trees (T4 and T16) will be removed to facilitate the development.

Minor encroachment of the root protection areas is envisaged which are within acceptable limits. Furthermore, the proposed buildings will be built on mini-piles to avoid the need for the trenching/excavation associated with traditional foundations. A 'preliminary' tree protection plan and tree protection measures has been provided. The proposal involves the removal of the unsightly portable cabin in front of the school (north boundary), which will be replaced with additional parking. The proposed single-storey buildings will be single-storey and timber-clad to minimise their impact within the green belt. additional car parking within the field is also proposed.

There are no objections on tree/landscape grounds subject to pre-commencement condition COM8 and post-commencement RES10 (parts 1, 2, 4 and 5). One of the remaining considerations is whether the proposal provides special circumstances which justify development within the Green Belt.

Contaminated Land Officer:

There are no objections to this application.

Based on the reported information within the combined Phase I and Phase II Geo-environmental Site Investigation document I have no objection or comment concerning this application.

Ecology Officer:

Objection to the proposed development

A large part of the existing site will be lost to the proposed development.

The submitted ecological survey (Phase 1) states:

"Given that the Preliminary Ecological Appraisal has identified suitable habitat for reptiles and great crested newt, further surveys are required in order to fully assess the potential ecological impacts of the proposed works. However, given the extent of retained habitat on site it is likely that there will be scope to incorporate suitable mitigation and enhancement measures to allow the proposals to

accord with relevant planning policy."

These surveys should have been undertaken by now and will need to be done to inform a decision. Without the information it is not possible for the Council to understand the impacts on these species (reptiles - UK Protected; Newts - European Protected).

It is not possible for the Council to be ensured that there will be suitable protection of valuable species without the survey data. The development is therefore contrary to policy EM7 of the Local Plan Part 1.

Revised Comments:

An amended ecological report was submitted which was reviewed by the Ecology Officer. The Ecology Officer commented on the revised ecology report noting the information presented was considered to be acceptable. Should the application have been considered acceptable, a pre-commencement condition would have been required.

Suggested Condition

Prior to commence of development a full ecological protection and enhancement strategy shall be agreed in writing with the Local Planning Authority. The strategy shall identify the measures necessary to protect the current wildlife on site, through trapping and translocation, and/or through the use of artificial refugia to move wildlife away from the construction areas. The strategy shall also include full details of the enhancement measures that will be incorporated into the development to provide features of wildlife value; these measures shall include a new water feature (i.e. pond), bat and bird boxes and areas within the landscape dedicated to protecting and enhancing opportunities for wildlife (this area should be of a sufficient size commensurate with areas lost to the development). The development must proceed in accordance with the approved strategy and thereafter retained as such.

Reason

To ensure the development protects and enhances wildlife in accordance with the NPPF and Local Plan Part 1 (EM7).

Conservation Officer:

The application site is a pocket of undeveloped land located to the north of the existing school site. It falls outside the curtilage of the listed buildings however it is an important contributor to the historic setting of the designated heritage assets to the south of the site. The listed buildings noted above date from the early 18th and 19th centuries. They form part of a historic estate known as Moorcroft, which comprised of the substantial estate house and its ancillary buildings, many of which we see today, forming part of extensive grounds and farmland which extended westwards. Moorcroft Farm located to the west of the site, formed part of the estate ownership. The setting of the heritage assets had originally been much more rural and open in appearance. Whilst this has been compromised to some degree by the encroachment of suburban development around, as existing the extent of the former estate is still visible by the retention of the surrounding open fields. It would need to be noted that the historic field boundaries have also been retained. This positively contributes to the significance and wider setting of the designated heritage assets.

The immediate setting of the listed buildings has somewhat been compromised by the development of the existing school building in the late 1960s and the following decades. This has led to a clutter of structures to the north and east of the designated heritage assets which detract from the setting of the listed buildings. Whilst it is duly noted a significant amount of time has passed the separation of land formerly associated to the Moorcroft estate has resulted in some harm to its significance.

The proposal comprises of expanding the school site developing a pocket of undeveloped green belt land to the north of the existing school building.

There are concerns regarding the proposal and the impact it would have on the surrounding environment. The existing sense of openness within the field and when viewed from the road would be disrupted by the introduction of a new built for and irregular site plan. Whilst a timber post and rail boundary treatment is associated to open, agricultural environments it would enclose the appearance of the field. Furthermore it is not clear whether this would be same approach adopted for the proposed coppice. There would be concerns that a more robust boundary treatment may be required at a later date which could resulting in significant harm to the sense of openness.

The proposal would expand the school site in a piecemeal manner adding to the existing clutter of structures associated to Hillingdon Manor School. The provision of parking would also formalise the space which would be highly visible from Harlington Road and the sense of openness that currently exists.

The appearance of the buildings and choice of material would be starkly different to the main school building. It would further highlight the poor appearance of the existing school building which detracts from the setting of the listed buildings. Historically the application site never formed part of the formal area associated to Moorcroft house and ancillary buildings, and had been associated to the farm. The absorption of the part of the field would disrupt the historic arrangement of the site result in some harm to the heritage assets. It would also result in the alteration of a historic field boundary.

There would be harm the immediate setting of the listed buildings and it would contribute to the erosion of their wider, once open, rural setting. Pocket views of the site would also be visible within the context of Vine Cottage from Harlington Road which would have a negative impact on the building's immediate setting.

In this instance such harm can be defined as less than substantial however a balanced judgement would need to be made in terms of whether there are ample public benefits to outweigh such harm.

There would be concerns that setting such a precedent of 'sprawling' development could result in further incremental harm to the heritage assets.

The further extension of the school site in such an unplanned manner would follow poor historic precedents which would further exacerbate the harm to the immediate setting of the listed buildings diminishing their significance. The consolidation of existing structures should be considered with an opportunity to enhance and better preserve the existing setting of the listed buildings in accordance to section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Highways Officer Comments

The total number of pupils (secondary) as a result of the scheme will amount to 145. In terms of highways impacts, the submissions state that an additional 12 parking spaces are being provided which will alleviate current congestion and in turn improve safety. However, plan no. 1594-02B shows that an additional 23 parking spaces are being provided. It is unclear if the additional provision is to accommodate pick-up and drop-off or teacher/visitor parking. This should be detailed. The number of parking should also be justified as stated in the both the adopted UDP and emerging DMT 6 policy.

Highways Officer Comments (Revised)

Planning permission is sought to build 2 new class rooms, a cafe and a 12 space car park at a site.

The development will allow for the intake of 15 additional post-16 pupils with Autistic Spectrum Conditions and learning difficulties. The application site is situated along A437 Harlington Road, Uxbridge. In the vicinity of the site Harlington Road is a dual carriageway with a 30mph speed limit. Harlington Road is a bus route and benefits from street lighting and footways on both sides of the road.

Access to the school is gained via an unadopted driveway leading off Harlington Road. This has speed humps and a footway on its northern side. According to the Transport for London WebCAT service the site has a PTAL ranking of 2 indicating that the school has limited access to public transport. There is however a northbound bus stop along Harlington Road very close to the school driveway. The A10, Uxbridge to Heathrow, U4, Uxbridge to Prologis Park and U7 Uxbridge to Lombardy Retail Park bus services call at this stop.

According to drawings provided by the applicant the site currently has 27 formally marked out car parking spaces. The developers report that drivers currently park 'on-street' along the driveway creating congestion problems and road safety concerns. Six cars may park along this driveway. There is no parking bays marked out along this driveway.

Planning permission is sought to build two new classrooms, one of which will replace an existing, a cafe for use 'by invitation, for local organisations and community groups to enjoy the hospitality aspects of the school's curriculum' and a 12 space car park. This new car park is intended to provide waiting space within the school grounds for people when the drop off or collect pupils, it will also provide parking for community group vehicles visiting the care. The layout of the existing car park would be re-marked to provide 38 spaces in total. With the development the application site would have 50 car parking spaces.

The application site will be served by a new access leading off the existing driveway. Hillingdon's adopted car parking standards are those contained in the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012). Policy AM14 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seeks to ensure that all development is in accordance with these Councils adopted Car Parking Standards. These require that a development of this type provides a quantum of parking based on the London Plan Standard (February 2004) which is to be assessed 'On an individual basis using a transport assessment and travel plan'. Neither a Travel Plan nor Transport Assessment has been submitted as part of this planning application. However, the Planning Statement explains that the 12 space car park will provide formal parking for those visitors that currently park 'on-street' along the driveway. The 12 space car park will include one disabled space and 11 standard spaces measuring 2.4 x 4.8m, together with 6m provided for vehicle turning and manoeuvring. These dimensions are in accordance with the Manual for Streets (Department for Transport, 2007) guidance.

The developers stress that the new car park will improve the existing situation by removing informal 'on-street' parking along the driveway. Taking into account that the development will allow an extra 15 students to be taught, if built the school could be expected to generate marginally more trips. These could be absorbed by the local highway network.

The Highway Authority requires that a Construction and Logistics Plan, Service and Delivery Plan are submitted for approval; these documents should be produced based on the guidance produced by TfL tailored to the development and local circumstances. These should be secured by way of suitable planning condition and/or S106 contributions.

Service and Delivery Plans:

Whilst there are no principle highway, traffic or transportation objections to this proposal, it is however necessary that the applicant provides revised drawings showing how any 'local

organisations and community groups' visiting the cafe by mini bus will be dropped off. Furthermore the applicants must demonstrate that the development includes routes around the site that are safe, accessible and convenient for pedestrians and wheelchair users to use. The layout of all car parks and internal access roads should accord with Manual for Streets (2007) guidelines.

Planning Policy Officer Comments

All of the proposed development site is designated as Green Belt. In accordance with the NPPF, London Plan policy 7.16, Saved UDP policy OL1 and emerging policy DMEI 4 'Development on the Green Belt or Metropolitan Open Land' the proposed school building would be inappropriate development in the Green Belt which by definition is harmful. Any such proposal will need to demonstrate 'very special circumstances' to show that the potential harm by reason of inappropriateness, and any other harm, is clearly outweighed by other planning considerations.

As the proposed development is a school, it should also be noted that paragraph 96 of the NPPF also states that local planning authorities should:

- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
- b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

The Council's Local Plan Part 1 Strategic Policies (para. 9.49) also highlights that the capacity of existing school sites is becoming increasingly limited and that these 'very special circumstances may necessitate the release of greenfield or Green Belt sites'. Such sites will only be identified where the need for additional forms of entry cannot feasibly be met through the expansion of existing schools or new development on suitable brownfield land. Broad support for the development of new schools to meet needs is included within policy C12 of the Local Plan Part 1 and the Council's emerging Local Plan Part 2 includes policy DMCI 1A 'Development of new educational floorspace' which sets out detailed criteria for the assessment of proposed schools.

Proposed Development

The proposed development includes three new buildings - a cafe and two classroom buildings, one of which is relocated from elsewhere in the site to make way for a new access road. The proposals also include the creation of a coppice area and outdoor Forest school facility. There is also the additional of new 12 space car park.

The need for the relocated and additional classrooms is linked to a desire to provide enhanced facilities for post-16 pupils through additional vocational opportunities through the creation of a Forest School and horticultural provision. The new buildings will allow for the provision of four classrooms (two of which are additional) and Forest Schools cafe. The cafe will enable the delivery of BTEC/ ASDAN hospitality and catering courses for learners with ASC. The adjacent horticultural areas is to allow for the growing of fruit and vegetables. The proposed Forest School area will be laid out with a learning circle and fire-pit.

Based on this description, it would appear that the outdoor horticultural and forest school provision included in this application would meet the exceptions in parts a) and b) of paragraph 145 of the NPPF. The classroom buildings, the cafe and the car park do not meet any of the exceptions in the NPPF and are therefore inappropriate development that is by its nature harmful to the Green Belt.

The applicant has written a further submission following feedback from the case officer on a number of matters which are addressed in the comments below.

Increasing school footprint/Location of new facilities

The relative footprint of the proposed buildings is a secondary issue in terms of impact. The primary issue is whether very special circumstances exist to justify the location of these buildings and the new car park within the Green Belt.

Meeting the requirement to show very special circumstances requires demonstrating to the satisfaction of the LPA that there is no alternative brownfield site which could accommodate these buildings and/or that it is necessary for them to be provided in this location. If this can be demonstrated, the next consideration would be if the benefits of the proposed development are considered to outweigh the harm to the function and openness of the Green Belt.

The applicant has not submitted evidence that alternative locations for the provision of the classrooms or cafe, either within this site, on other sites operated by the applicant, nor has the applicant identified other brownfield options that have been explored.

An option to an alternative site would be to explore options for accommodating the proposals within the existing built footprint of the Green Belt site. The LPA has not been shown any alternative design options which were considered as part of the development of this site or why existing classrooms space could not be utilised. A further issue is that one of the classroom buildings is being replaced to allow for the creation of additional car parking spaces that do not form part of this application. It is unclear why this classroom cannot be kept on its current site rather than being moved and placed on an undeveloped part of the Green Belt where the impact on the function and openness of the Green Belt is more significant. The retention of this building would also have no impact on the provision of outdoor recreation space on the existing site which is one of the concerns raised by the applicant.

Assuming these issues can be addressed, the next step would be to consider in more detail the need for these enhanced facilities, and their provision in this specific location. Given this is a fee paying school it does not meet local need in the same way as state funded provision. It is also likely to have a much wider catchment area. The applicant makes the case that there are currently no other schools in Hillingdon which provide post-16 education for children with ASC. However, the applicant does state that the school already makes provision for pupils up to the age of 19 which is supported by information on its website. Furthermore, this enhanced provision would only be open to those families or authorities who are able to afford these places. Consequently whilst it is recognised that the proposed provision would be of benefit to those learners with ASC who have the means to access places at this school, the proposal meets a limited local educational need. It is not considered to provide very special circumstances in this case, particularly as alternative options and locations have not been explored.

The applicant argues:

- the new classrooms is linked to the existing school buildings, and relies on its proximity to the outdoor recreation elements;
- that the scale of the proposed buildings have been designed to minimise harm to the Green Belt;
- and
- that the proposals are no greater in scale than previously approved extensions.

The case referred to in the applicant's follow-up letter (3043/APP/2009/673) was determined in 2009 prior to the publication of the NPPF and the requirement to demonstrate very special circumstances. Furthermore, the approved extensions, whilst on Green Belt land were located within the existing developed area, did not spill over the established field boundary in to undeveloped areas of Green Belt, and were screened by existing trees and planting from the adjacent field limiting the impact on openness. On the point, that the new facilities must be provided in this location to link to the outdoor horticultural area and Forest school, the existing classrooms will still enable access for pupils on the site to these new facilities and it is not unusual for the outdoor facilities of a Forest school to be

located some distance from linked indoor facilities. Finally, in terms of the building design, the LPAs current position is that all of the buildings are inappropriate development in the Green Belt and therefore by definition harmful.

A final element of the proposed development which has not been addressed in the applicant's additional comments is the proposed new car park. Paragraph 2.2.10 of the applicant's planning statement outlines that this new car park is intended to address existing deficiencies in provision i.e. they will 'replace the unmarked parking which currently takes place on the main access road for the school thereby reducing congestion and improving safety'. The LPA is clear that the need to mitigate existing problems does not amount to very special circumstances and the car park would also be inappropriate development in the Green Belt.

Purposes of the Green Belt

The applicant is correct to state that the Council's response makes no comment with regard to the purposes of including land in the Green Belt. The Council undertook a Green Belt Assessment in 2013 in support of its emerging Local Plan Part 2 which review any proposed changes to the Green Belt boundaries proposed during the preparation of the 1998 UDP and the Local Plan Part 1 2012. No representations have been received from the school regarding the Green Belt designation of the application site.

Local Education Authority

Hillingdon Manor school is an independent special school for children and young people aged 3 -19 who have been diagnosed with Autistic Spectrum Disorder (ASD). It operates on two sites within the London Borough of Hillingdon but serves demand from a wider regional area. It is not 'maintained' by the council nor has any close relationship with it. When appropriate, the Council may choose to commission and pay for places for resident pupils to attend the school.

Currently there are 29 resident pupils of London Borough of Hillingdon on roll, out of a total roll of about 185. The council plans to reduce the number of placements to the school in the next few years as planned expansions in Hillingdon maintained provision will provide more provision for pupils with ASD. Therefore in terms of the Borough residents, its current size is adequate. The school's proposed extension has not been discussed with the Council SEN team.

The Council has a legal duty to ensure pupils who live in LB Hillingdon with specific additional needs have those diagnosed and set out in Education, Health and Care Plans (EHCPs) and then have those needs met in appropriate provision, within mainstream or special schools in the Borough or beyond. As with all independent special schools, it is registered with the Department for Education (DfE) and inspected by Ofsted, most recently in September 2019.

The school had no prior conversations with the Council SEN Service about its proposal. The Council has a range of maintained provision for pupils of both primary and secondary age with Autistic Spectrum Disorder, within three special schools and five mainstream schools with Special Resources Places. This is being further expanded by new built provision across special and mainstream schools which will open in 2020 along with more in the planning stage to open in 2021, including some post-16 provision.

At this stage, we believe that there would be sufficient range of provision in the near future for pupils with ASD resident in Hillingdon without the Council needing to buy places in this provision, assuming all the other planned expansions open.

This proposal would be a new local provision for horticultural education for pupils with ASD aged 16-19 and would contribute to their education and life experiences. However, they may not necessarily

be from the local area.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

Paragraph 94 of the NPPF (2019) notes it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities are required to give great weight to the need to create, expand or alter schools through decisions on applications.

Policy 3.18 of the London Plan (2016) supports the provision of and enhancements of new build, expansion of existing or change of use to educational purposes.

Local Plan: Part 1 - Strategic Policies, policy CI1 (2012) confirms that the Council "will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations by [amongst other criteria] supporting extensions to existing schools and the development of new schools and youth facilities."

Policy R10 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and policy DMCI 1A of the emerging Local Plan Part 2 encourage the provision of enhanced educational facilities across the borough subject to detailed criteria including impact on the Green Belt.

Policy DMCI 2 of the emerging Local Plan: Part 2 (2019) notes proposals for the provision of new community facilities will be supported where they:

- are located within the community or catchment that they are intended to serve;
- provide buildings that are inclusive, accessible, flexible and which provide design and space standards meet the needs of intended occupants;
- sited to maximise shared use of the facility, particularly for recreational and community uses; and
- make provision for community access to the facilities provided.

At national level the MHCLG Policy Statement on Planning for Schools Development and the NPPF are particularly supportive of applications which enhance existing schools.

The proposal seeks to erect a new buildings to provide new facilities for the Skills for Life Centre. The current provision would be extended to provide additional vocational opportunities for students aged 16+ with autism and learning disabilities through the creation of a Forest School and horticulture provision. The proposal includes a cafe which would be used by the school and local community groups by invitation only.

There is no in principle objection to the provision of enhanced educational facilities and associated cafe subject to compliance with Green Belt policies and the Development Plan (issues which are covered in other sections).

7.02 Density of the proposed development

Not applicable to this application.

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

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires Local Planning Authorities to give considerable importance and weight to the desirability of preserving the setting of listed buildings' when carrying out the balancing exercise.

Policy HE1 of the Local Plan: Part One (November 2012) states the council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes: Historic village cores, Metro-land suburbs, planned residential estates and 19th and 20th century industrial areas and its features including designated heritage assets such as statutorily Listed Buildings and Conservation Areas.

Policy DMHB 1 of the emerging Local Plan: Part Two (2019) relates to heritage assets. It requires developments to ensure heritage asset are put to viable uses consistent with their conservation and ensure development do not result in substantial harm or total loss of significance.

The application site is a pocket of undeveloped land located to the north of the existing school site. It falls outside the curtilage of the listed buildings however it is an important contributor to the historic setting of the designated heritage assets to the south of the site. The listed buildings date from the early 18th and 19th centuries. They form part of a historic estate known as Moorcroft, which comprised of the substantial estate house and its ancillary buildings and part of extensive grounds and farmland which extended westwards. Moorcroft Farm located to the west of the site, formed part of the estate ownership.

The Conservation Officer has commented on this application noting the setting of the heritage assets had originally been much more rural and open in appearance. Whilst this has been compromised to some degree by the encroachment of suburban development in the local area, as existing the extent of the former estate is still legible by the surrounding open fields and the retention of historic field boundaries. This positively contributes to the significance and wider setting of the designated heritage assets.

The immediate setting of the listed buildings has somewhat been compromised by the development of the main Hillingdon Manor School building in the 1970s and thereafter. This has led to a clutter of structures to the north and east of the designated heritage assets which detract from the setting of the listed buildings.

The Conservation Officer has raised objections to the application noting concerns regarding the impact of the development on the nearby listed building and the loss of the existing historic boundary. The existing sense of openness within the field and when viewed from the road would be disrupted by the introduction of a new built for and irregular site plan.

Timber post and rail boundary treatments are associated with open, agricultural environments. It is not clear whether this approach is to be adopted for the proposed coppice. The Conservation Officer is concerned that a more robust boundary treatment may be required at a later date which could result in significant harm to the sense of openness. The proposal would expand the school site in a piecemeal manner. The provision of parking would also formalise the space which would be visible from Harlington Road and erode the sense of openness that currently exists.

There would be harm the immediate setting of the listed buildings and it would contribute to the erosion of their wider, once open, rural setting. Pocket views of the site would also be visible within the context of Vine Cottage from Harlington Road which would have a negative impact on the building's immediate setting. The further extension of the school site in such an unplanned manner would follow poor historic precedents which would further exacerbate the harm to the immediate setting of the listed buildings diminishing their significance. The consolidation of existing structures should be considered with an

opportunity to enhance and better preserve the existing setting of the listed buildings in accordance to section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The Conservation Officer has concluded that in this instance such harm can be defined as less than substantial however a balanced judgement would need to be made in terms of whether there are ample public benefits to outweigh such harm. The benefits of the proposal have been given great weight in coming to a decision and it is considered that the benefits are limited and they do not outweigh the harm to the historic natural and built environment contrary to Policy HE1 of the Local Plan: Part One (November 2012) and Policy DMHB 1 of the emerging Local Plan: Part Two (2019).

7.04 Airport safeguarding

Not applicable to this application.

7.05 Impact on the green belt

The National Planning Policy Framework (NPPF) attaches great importance to the Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. The NPPF states that once Green Belt boundaries have been defined and local planning authorities are required to positively to enhance the beneficial use of the Green Belt.

Paragraph 145 of the NPPF (2019) notes a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt unless it meets one of the exceptions.

Policy OL1 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) states the LPA will not grant planning permission for new buildings or changes of use of existing lands and building other than for purposes essential for and associated with the uses specified below:

- i) agriculture, horticulture, forestry and nature conservation;
- ii) open air recreational facilities;
- iii) cemeteries.

The outdoor recreation activity is considered appropriate development within the Green Belt, however the provision of buildings and associated car parking does not benefit from the exceptions set out in Policy OL1 of the Local Plan: Part Two (November 2012) or Paragraph 145 of the NPPF (2019) and is therefore considered inappropriate development within the Green Belt.

Policy OL4 of the Hillingdon Local Plan - Saved UDP Policies (November 2012) states that the replacement or extensions of buildings within the Green Belt will only be permitted if the development would not result in any disproportionate change in the bulk and character of the original building; the development would not significantly increase the built up appearance of the site and, having regard to the character of the surrounding area, the development would not injure the visual amenities of the Green Belt by reason of siting, materials, design, traffic or activities generated.

The London Plan strongly supports the protection, promotion and enhancement of London's open spaces and natural environments. Policy 7.16: Green Belt states that in terms of planning decisions:

"The strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance."

Policy EM2 of the Local Plan: Part One (November 2012) notes that any proposals for development in the Green Belt will be assessed against national and London Plan policies, including the very special circumstances test.

The proposal does not conform to the types of development allowed by Saved Policy OL1, the London Plan or the NPPF and as such the proposal comprises inappropriate development, requiring very special circumstances to justify the proposal.

Policy DME1 4 of the emerging Local Plan: Part Two (2019) notes inappropriate development in the Green Belt will not be permitted unless there are very exceptional circumstances.

The application site comprises a field situated to the north of the Manor School. The field is separated from the main school by scrubland and trees. The site area comprises approximately 0.57ha. The site to the north and west of the school site is largely open and green. The proposal would involve in the erection of 3 new single storey flat roofed modular buildings to facilitate 4 new classrooms and an associated cafe to the north of the main school within the existing field. The proposal also involves new car parking immediately to the east of the proposed cafe which would comprise 12 car parking spaces. The submitted planning statement notes the new buildings would be visually connected to the main school and will be seen in the context of the main school.

The proposed buildings and car parking are considered inappropriate development within the Green Belt as it does not fall within any of the exceptions set out in paragraph 145 of the Framework. Policy 7.16 of the London Plan (2016) and Policy EM2 of the Local Plan: Part One (November 2012) notes that development should not be approved except in very special circumstances. Very special circumstances will not exist unless the harm to the Green Belt by reason of inappropriateness and any other harm is clearly outweighed by other considerations.

The applicant's Planning Statement advances very special circumstances to justify the development noting there is a strong need for additional Special Needs Provision provision within the Borough. The applicant notes there is no other schools which provides post-16 years education for children with Autistic Spectrum Conditions (ASCs) and there are only six schools in nearby boroughs that offer post-16 qualifications. The proposed development will provide school places for up to 15 post-16 students from 2020.

The Planning Statement also notes to support students on the ASDAN and BTEC courses, the school provides access to a learning kitchen. The learning kitchen can accommodate up to eight pupils at any one time and currently there are 64 pupils who have regular access. There is, in addition, demand from another 50-60 students who cannot be accommodated due to the size of the existing kitchen. The proposal includes an additional kitchen to allow pupils to learn new skills using workspaces and appliances similar to those in their own homes, thus facilitating the transference of skills.

The Planning Statement asserts the school currently has no facilities to enable students to study for horticulture qualifications. The closest providers with options for land-based

studies and horticulture onsite are Capel Manor in Enfield (36 miles) and Buckinghamshire College of Agriculture in Maidenhead (24 miles) Expanding into this area would allow the school to offer this provision.

The applicant argues:

- the new classrooms is linked to the existing school buildings, and relies on its proximity to the outdoor recreation elements;
- that the scale of the proposed buildings have been designed to minimise harm to the Green Belt; and
- that the proposals are no greater in scale than previously approved extensions.

The Local Education Authority has commented on this application noting that of the 188 pupils on the school roll, only 29 students are from the London Borough of Hillingdon. It is noted from the OFSTED report that there are 17 other local authorities from within London and the Home Counties that send pupils to this school. The Council has a range of maintained provision for pupils of both primary and secondary age with Autistic Spectrum Disorder, within three special schools and five mainstream schools with Special Resources Places. This is being further expanded by new built provision across special and mainstream schools which will open in 2020 along with more in the planning stage to open in 2021, including some post-16 provision. At this stage, there is a sufficient range of provision in the near future for pupils with ASD resident in Hillingdon without the need to place students from Hillingdon in this provision.

In the absence of a sequential test, the applicant has failed to demonstrate there are no alternative appropriate sites (which given the wide range of local authorities that place pupils at the school would logically need to cover a large area), outside the Green Belt to meet the need for school places which the service provides.

In relation to car parking, the proposal includes an area of car parking immediately east of the proposed cafe for 12 spaces. Existing car parking spaces would be reconfigured following the removal of an temporary classroom from the existing car park. Overall, 48 car parking spaces would be provided which represents a net increase of 21 car parking spaces.

The Planning Policy officer was consulted on this application and advises that application ref: 3043/APP/2009/673 was determined in 2009 prior to the publication of the NPPF and the requirement to demonstrate very special circumstances. Furthermore, the approved extensions, whilst on Green Belt land were located within the existing developed area, did not spill over the established field boundary in to undeveloped areas of Green Belt, and were screened by existing trees and planting from the adjacent field limiting the impact on openness.

The Planning Policy Officer has considered the need to locate new facilities in this location to link to the outdoor horticultural area and Forest school and is of the view that the existing classrooms will still enable access for pupils on the site to these new facilities and it is not unusual for the outdoor facilities of a Forest school to be located some distance from linked indoor facilities.

In terms of the need for new car parking, Paragraph 2.2.10 of the submitted Planning Statement outlines the new car park is intended to address existing deficiencies in provision i.e. they will 'replace the unmarked parking which currently takes place on the

main access road for the school thereby reducing congestion and improving safety'. Paragraph 4.5.30 of the Planning Statement states "no new car parking is proposed. The proposed development will utilise the existing pedestrian and vehicular access and will include marking out of 12 parking spaces (including one disabled car parking space) in a new parking area adjacent to the new Forest Schools cafe. This marked parking area is intended to provide waiting space within the school grounds for people when they drop off or pick up their children and for community group vehicles when invited to visit the cafe, thereby removing the overspill parking on the access road."

It is understood, based on a review of the school's planning history and a review of OFSTED reports, that there has been an incremental increase in the number of pupils at this school. In 2012, there were 123 pupils on the school roll, this has increased to 188 pupils. It is therefore considered that this application may be seeking to address an existing car parking capacity issue by re-providing a classroom building and new car parking within the Green Belt.

The proposal is inappropriate development within the Green Belt and it does not fall within any of the exceptions set out in paragraph 145 of the Framework. Policy 7.16 of the London Plan (2016) and Policy EM2 of the Local Plan: Part One (November 2012).

In terms of the impact of this development on the openness of the Green Belt, the 3 modular buildings will protrude considerably above the surface of the land. Due to their size and bulk, taking up a volume of space that had previously not contained any buildings or hard surfacing. This additional amount of built development would lead to a loss of openness in spatial terms. This would create a more developed setting to the school building therefore harming the previous openness of this site.

7.07 Impact on the character & appearance of the area

Policy 7.1 of the London Plan (2016) sets out a series of overarching design principles for development in London and Policy 7.6 (2016) seeks to promote world-class, high quality design and design-led change in key locations. In addition to Chapter 7 of the London Plan (2016) policies relating to density (3.4) and sustainable design and construction (5.3) are also relevant.

Policy BE1 of the Local Plan: Part 1 (November 2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.

Policy BE13 states that new development will not be permitted if the layout and appearance fail to harmonise with the existing street scene or other features of the area which the local planning authority considers it desirable to retain or enhance.

Policy BE19 states that the Local Planning Authority will seek to ensure that new development within residential areas complements or improves the amenity and character of the area.

Policy BE21 states that planning permission will not be granted for new buildings which by reason of their siting, bulk and proximity, would result in a significant loss of residential amenity.

Policy DMHB 11 of the emerging Local Plan: Part Two (2019) requires new developments to be designed to the highest standards and, incorporate principles of good design by

harmonising with the local context by taking into account scale, height, mass and bulk, building plot sizes and widths, plot coverage and established street patterns; building lines and setbacks, rooflines, streetscape rhythm.

The proposed buildings would be single storey and set back from the Harlington Road by approximately 75m, as such, the proposal is unlikely to result in a significant visual impact on the street scene given the siting and scale of the proposed buildings. Nevertheless the car parking area situated to the immediately to the east of the building would be visible from Harlington Road, albeit its visual impact would be limited.

Although limited visual harm has been identified from the surrounding area, this does not overcome the objections with regards to the impact of the proposal on the Green Belt and the setting of the listed buildings.

7.08 Impact on neighbours

Policies BE20 and BE21 of the Hillingdon Local Plan - Saved UDP Policies (November 2012) and the Council's HDAS: Residential Layouts SPD seek to ensure that new buildings and extensions maintain and allow adequate levels of daylight and sunlight to penetrate into and between them.

The nearest residential dwellings are situated approximately 50m to the south of the site. Given the siting and scale of the proposed building, the application is unlikely to result in harm to the amenities of neighbouring residential properties.

7.09 Living conditions for future occupiers

Not applicable to this application.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Paragraph 108 of the NPPF (2019) notes that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that safe and suitable access to the site can be delivered for all users.

Policy 6.3 of the London Plan (2016) requires development proposals to provide transport assessments will be required in accordance with TfL's Transport Assessment Best Practice Guidance which includes travel plans.

Policy 6.10 of the London Plan (2016) requires development proposals to ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space.

Policy AM7 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) considers whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety. Policy AM14 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seeks to ensure that all development is in accordance with the Council's adopted Car Parking Standards.

Policy DMT 5 of the emerging Local Plan: Part Two (2019) notes development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network.

Policy DMT 6 of the emerging Local Plan: Part Two (2019) requires development proposals to comply with the car parking standards in order to facilitate sustainable development. Developments are required to demonstrate the variance would not lead to a deleterious

impact on street parking provision, congestion or local amenity.

Car Parking

The highways officers have commented on this application and note that Paragraph 4.5.30 of the Planning Statement notes 'no new car parking is proposed'. The proposed development will utilise the existing pedestrian and vehicular access and will include marking out of 12 parking spaces (including one disabled car parking space) in a new parking area adjacent to the new Forest Schools cafe. This marked parking area is intended to provide waiting space within the school grounds for people when they drop off or pick up their children and for community group vehicles when invited to visit the cafe, thereby removing the overspill parking on the access road.

The existing and proposed block plans have been reviewed and it is noted that the existing block plan illustrates 28 existing car parking spaces and the proposed block plan illustrates there are 50 car parking spaces. There are therefore inaccuracies within the applicant's submission. The applicant makes reference to 'overspill car parking on the access road' though it should be noted that the informal car parking along the access road is due to poor management of the access road leading into the school.

Nevertheless, it is noted the applicant stress that the new car park will improve the existing situation. The highways officer has advised that taking into account that the development will allow an extra 15 students to be taught, if built the school could be expected to generate marginally more trips. These could be absorbed by the local highway network, on this basis there is no highway objection to the additional car parking.

It is noted that the current footpath stops in front of parked cars, compromising ease of movement for pedestrians and wheelchair users arriving on foot or by public transport. The applicant has provided amended plans which illustrate a pedestrian access leading upto the existing and proposed school. On this basis, the proposal is considered acceptable.

Travel Plan

TfL require all schools to have a school travel plan in place to facilitate sustainable travel. The school have not presented a school travel plan or provided details of how car parking is managed for staff at the site. Should the application have been considered acceptable, a condition would have been secured requiring a school travel plan.

The applicant has provided an amended plan which illustrates the footway has been amended so there is level pedestrian access to the existing and proposed entrances which is a material consideration in favour of this development, however it does not overcome the heritage and Green Belt objections to this application.

Cycle Parking

The applicant has failed to provide details of cycle parking for the proposed development, should the application have been considered acceptable, details of secure cycle parking would have been required by way of a condition.

7.11 Urban design, access and security

URBAN DESIGN

See section 7.07.

DESIGNING OUT CRIME

Policy 7.3 of the London Plan (2016) of the London Plan (2016) requires developments to reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.

Should this application have been considered acceptable, a secured by design condition covering the site could have been attached.

7.12 Disabled access

Policy 3.1 of the London Plan (2016) requires development proposals to protect and enhance facilities and services that meet the needs of particular groups and communities.

Policy 7.2 of the London Plan (2016) requires design and access statements to be submitted with development proposals to explain how, following engagement with relevant user groups, the principles of inclusive design, including the specific disabled people, have been integrated into the proposed development, whether relevant best practice standards such as British Standard BS 8300:2009 + A1:2010 have been complied with, and how inclusion will be maintained and managed.

The access officer has reviewed the amended proposal and notes accessible facilities including accessible pedestrian and wheelchair path leading to the entrance have been provided and on this basis raises on objections to this application.

7.13 Provision of affordable & special needs housing

Not applicable to this application.

7.14 Trees, landscaping and Ecology

Policy BE38 seeks the retention and utilisation of topographical and landscape features of merit and the provision of new planting and landscaping wherever it is appropriate.

The trees and landscaping officer has commented on the application noting that according to the submitted tree report, two poor quality trees (T4 and T16) will be removed to facilitate the development. Minor encroachment of the root protection areas is envisaged which are within acceptable limits. The proposed buildings will be built on mini piles to avoid the need for the trenching / excavation associated with traditional foundations to minimise its impact on trees. No objection has been made to the proposal. Should the application have been considered acceptable, details would have been required providing details of tree protection and hard and soft landscaping.

7.15 Sustainable waste management

Policy 5.17 'Waste Capacity' of the London Plan (2016) sets out the Mayor's spatial policy for waste management, including the requirements for new developments to provide appropriate facilities for the storage of refuse and recycling. No provision for refuse and recycling has been shown. However given the proposed buildings are associated with the main school, it is expected that the refuse and recycling arrangements would be shared with the main school. Should the application have been considered acceptable, details of refuse and recycling would be have been subject to a condition.

7.16 Renewable energy / Sustainability

Not applicable to this application.

7.17 Flooding or Drainage Issues

Policy 5.13 of the London Plan (2016) states that development proposals should use sustainable urban drainage systems (SuDs) unless there are good reasons for not doing so and that developments should aim to achieve green-field run-off rates. Policy 5.15 goes

on to confirm that developments should also minimise the use of mains water by incorporating water saving measures and equipment.

The planning statement proposes the use of a green roof and Sustainable Drainage Systems (SuDS) within the development. The flood water management officer has raised no objections to the proposal, Should the application have been considered acceptable, details of SuDS could have been secured by way of a condition.

7.18 Noise or Air Quality Issues

Not applicable to this application.

7.19 Comments on Public Consultations

These have been addressed within the main body of the report.

7.20 Planning obligations

Not applicable to this application.

7.21 Expediency of enforcement action

Not applicable to this application.

7.22 Other Issues

None.

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 to this application.

10. CONCLUSION

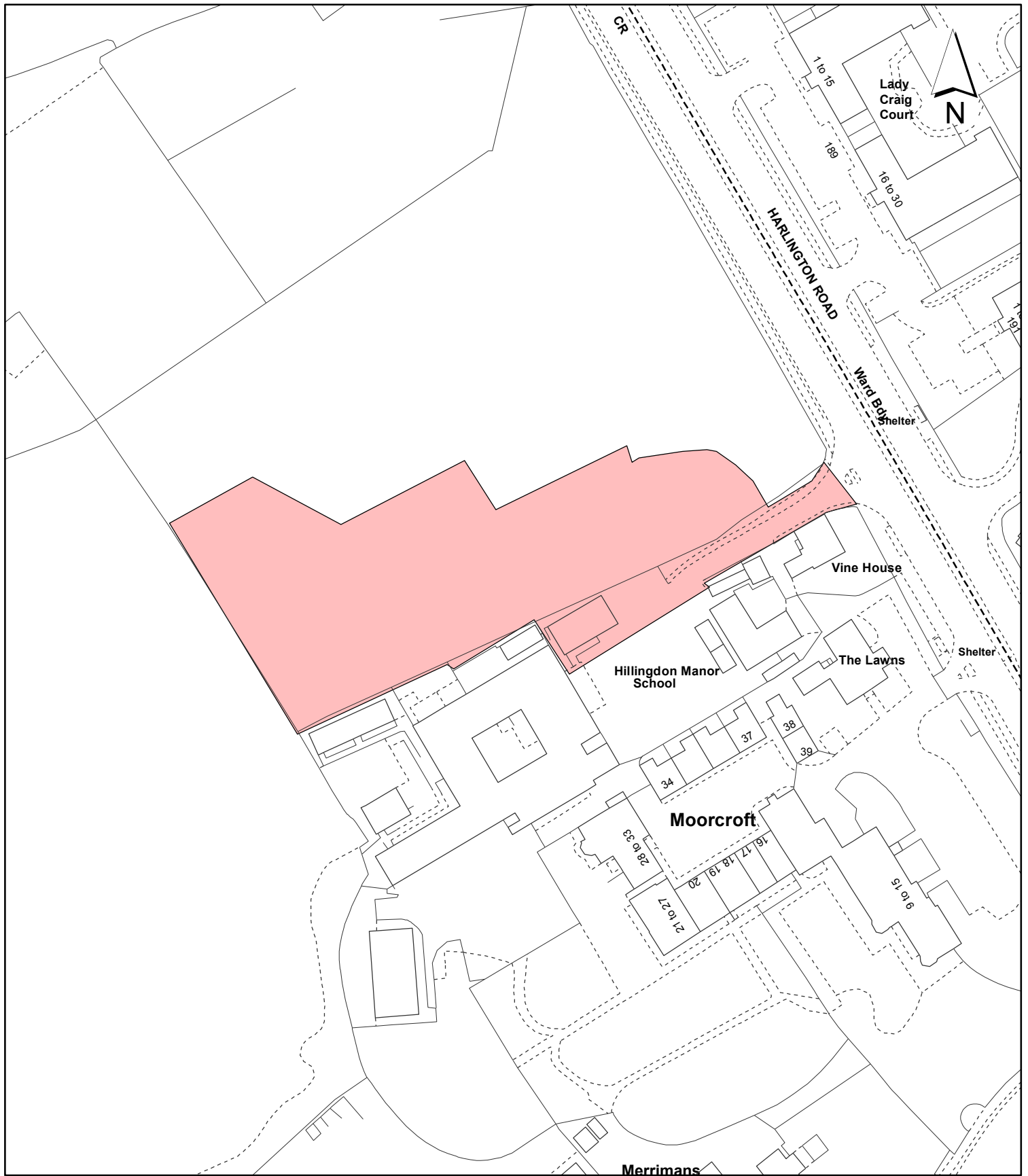
The proposal involves the erection of 3 buildings with an area of car parking with associated access and landscaping within an open field that is situated entirely within the Green Belt. The proposed development is considered to be inappropriate development within the Green Belt and the applicant has failed to demonstrate there are very special circumstances to justify this development in the Green Belt. The development would result in harm to the setting of the Listed Building by providing buildings, access and car parking and encroaching on a historic field boundary that is important to the setting of the Grade II Listed Building. For the reasons outlined within this report, the application is recommended for refusal.

11. Reference Documents

Hillingdon Local Plan: Part One - Strategic Policies (November 2012)
Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012)
Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019)
The London Plan (2016)
National Planning Policy Framework
Draft London Plan (2018)

Contact Officer: Zenab Haji-Ismael

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Notes:

 Site boundary

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Site Address:

Hillington Manor School

Planning Application Ref:
3043/APP/2019/1788

Planning Committee:
Central & South

Scale:
1:1,250

Date:
December 2019

LONDON BOROUGH OF HILLINGDON
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