

Report of the Head of Planning, Transportation and Regeneration

Address LAND ADJOINING GURU NANAK SIKH ACADEMY SPRINGFIELD ROAD
HAYES

Development: Construction of a new three-storey 4FE primary school (to replace the existing Nanaksar Primary School) with associated hard and soft landscaping, outdoor sports provision, car parking and new access arrangement

LBH Ref Nos: 4450/APP/2020/515

Drawing Nos: FS0128-ALA-XX-XX-DR-L-0023 P01
FS0128-ALA-XX-XX-DR-L-0022 P01
FS0128-CPM-01-03-DR-A-2004 P05
FS0128-CPM-01-ZZ-DR-A-2010 P03
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74867-CUR-00-XX-RP-TP-00002-V03_Travel Plan
FS0128-CPM-01-02-DR-A-2003 P08
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UK18.4283c - Phase II Geo Environmental Investigation
UK18.4283 Phase I Geo Environmental Study
Initial planning statement R003 V2
Sequential assessment R002 V4
Lighting plan D38481/LC/A
Carbon emissions spreadsheet
FS0128-CPM-01-ZZ-DR-A-2015 P05
Topographical Survey (ref: 001 Rev A)
Agronomy Condition Assessment Audit
74867-CUR-00-XX-RP-TP-00001 V03 Transport assessment
Biodiversity Phase 1 Habitat Survey (ref: 6726 J00103)
Acoustic Strategy
19-1650.02_REP Site investigation and remediation report (CL)
19-1650.01_REP Geo Environmental report
J3980 Rev D Revised air quality assessment
200213 CDB 0045317 Noise impact assessment
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			29/04/2020
			31/03/2020

1. SUMMARY

The application seeks planning permission for the construction of a new 3-storey 4FE primary school (to replace an existing temporary primary school) with associated hard and soft landscaping, outdoor sports provision, and new access arrangement.

Currently, there is temporary classroom accommodation for a 2 Form Entry (2FE) primary school on site with a floor space of approximately 400 square metres, which was opened in 2009. Adjacent to the site on the western boundary, there is a 5-FE secondary school with 750 pupils and a 2-FE primary school with 420 pupils, both operating as Sikh Community Nanaksar Schools. The proposed new building would replace the existing temporary huts as well as adding and additional 2-FE to create capacity for a 4-FE primary school for up to 840 pupils.

The Education Act 1996 states that Local Authorities have a duty to educate children within their administrative area. In the main metropolitan areas throughout the country there has been a significant increase in the need for school places and this holds true for London. This increase reflects rising birth rates, migration changes and housing development. Many primary schools in the borough have already expanded and planning consent has been issued for a number of new primary schools in the last 5 years. The Hillingdon Primary Capital Schools Programme is part of the Council's legal requirement to meet the educational needs of the borough.

The Council has already invested significantly in additional school places in the primary

sector. Overall, at primary school level, the need for additional school places has largely been met by the successful school places expansion programme mentioned above. The Council's latest Strategic Infrastructure Plan (SIP) contains an up to date assessment of school place needs over the period of the Local Plan. Nine new forms of entry are expected to be needed in the south of the Borough by 2023/24, with 6 of these being needed in the Hayes. It is considered that the applicant has provided sufficient evidence to demonstrate the need for further places within this area and this is supported by the comments from the Council's School Place Planning Manager.

The proposal is consistent with the aims of the National Planning Policy Framework (NPPF)219, London Plan policy 3.18 and Local Plan Policy DMCI 1A, which seek to encourage the provision of new and/or enhanced educational facilities. Furthermore, whilst it would inevitably impact on the openness and visual amenity of the Green Belt in this location, the applicant has demonstrated a case of very special circumstances sufficient to justify an exception to current policy, which seeks to protect such land from unacceptable development. Notably, the Greater London Authority (GLA) have confirmed that they accept the very special circumstances presented such that they have raised no objections on Green Belt grounds.

It is recognised that the proposal includes the partial loss of the existing school playing field which has been met with objection by Sport England. Notwithstanding this the applicant has worked with the Local Authority and Sport England to ensure that the scheme includes an acceptable level of sports re-provision. Revised plans have been submitted demonstrating compliance with Sport England's sports facility standards however the proposal fails to adhere to the request for sports lighting which has been raised by Sport England directly. For reasons explained in greater detail within the principle section of this report the Local Planning Authority is unable to agree to the sports lighting within this location. The level of sports provision accompanied by the strong policy support for the enhancement of educational facilities is considered to outweigh the harm caused by the partial loss of the playing field.

The proposal is supported by a detailed Transport Assessment, which following much negotiation with the applicant, provides for mitigation measures to reduce its impact on the local highway network. The Council's Highway Engineer has reviewed this information in detail and confirmed that, subject to appropriate conditions and a S106 agreement to secure off-site mitigation measures, the proposed development would be acceptable in terms of traffic impact, pedestrian and highway safety.

The proposal is considered to comply with relevant Local Plan Policies and London Plan policies and, accordingly, it is recommended that delegated powers be given to the Head of Planning and Enforcement to approve the scheme, subject to the appropriate referrals to the GLA.

2. RECOMMENDATION

That delegated powers be given to APPROVE this application by the Head of Planning, Transportation and Regeneration to grant planning permission, subject to the following:

A. That the application be referred to the Secretary of State for Housing, Communities and Local Government. The application shall also be referred to the Mayor of London (Greater London Authority) under Article 5 of the Town and Country Planning (Mayor of London) Order 2008.

B. That should the Secretary of State and or GLA not call in the application, the

application be deferred for determination by the Head of Planning, Transportation and Regeneration for an approval.

C. 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:

1. A contribution to the sum of £176,847 to secure all necessary highway works including written agreement from the Local Planning Authority on the final proposed public realm improvements to the pedestrian environment which comprise:

(1) £26,000 - Shared use footpaths linking the subways at Minet Drive and Abbotswood Drive with the school and Springfield Road.

(2) £15,000 - Installation of a 'School Keep Clear' markings CCTV camera to enforce illegal parking.

(3) £1,370.00 - Measures to create an active travel zone around the school, including works to reduce road safety risk, encourage active travel and create a 'Healthy Streets' environment: Traffic management.

(4) £6,682.00 - Preliminary design works

(5) £53,375.00 - Measures to create an active travel zone around the school, including works to reduce road safety risk, encourage active travel and create a 'Healthy Streets' environment: Carriageway surfacing.

(6) £29,420.00 - Measures to create an active travel zone around the school, including works to reduce road safety risk, encourage active travel and create a 'Healthy Streets' environment: Footway & kerb.

(7) £25,000.00 - Measures to create an active travel zone around the school, including works to reduce road safety risk, encourage active travel and create a 'Healthy Streets' environment: Street lighting.

(8) £20,000 for Uxbridge Road/Springfield Road junction improvements.

2. The provision of a Green School Travel Plan: Prior to first occupation a full travel plan to be submitted to and approved in writing by the council. Thereafter, the Travel Plan is required to be reviewed at regular intervals to monitor its impact and, if required, it shall be updated and/or amended in order that its aims and objectives are achieved. Therefore, a travel plan review should be undertaken and submitted to the Local Planning Authority for approval at 25%, 50%, 75% and 100% occupation of pupils and staff. The Travel Plan shall demonstrate a commitment to the ongoing provision and expansion of the existing school bus service to cater for the growing number of pupils and also a commitment to the ongoing review of and provision of additional cycle parking provision should demand dictate. A Travel Plan bond in the sum of £20,000 is also to be secured.

3. Community Use Agreement: Prior to occupation of the development a Community Use Scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of hours of use, access to the grass pitches, all weather pitch, MUGA and sports hall (including WCs and changing rooms) by non-school users, management responsibilities and include a mechanism for review. The approved scheme shall be implemented upon commencement of use of the development.

4. Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered.

5. Carbon off-set contribution as required by an approved Energy Assessment

6. Staggered Start and finish times for the Guru Nanak Academy Trust Schools on Springfield Road;

7. Project Management & Monitoring Contribution equal to 5% of the total cash contributions. Details shall be in accordance with the Council Planning Obligations Supplementary Planning Document 2014.

D. That the applicant meets the Council's reasonable costs in the preparation of the Section 106 agreement and any abortive work as a result of the agreement not being completed.

E. That the officers be authorised to negotiate the terms of the proposed agreement and conditions.

F. That, if the S106 agreement has not been finalised within 31-08-2020, under the discretion of the Head of Planning, Transportation and Regeneration, the application is refused under delegated powers on the basis that the applicant has refused to address planning obligation requirements.

'The applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of affordable, vehicle, pedestrian and cycle improvements, carbon offset, travel plan, construction training and highway works). The proposal therefore conflicts with Policy H2 of the Hillingdon Local Plan Part 1, Policies DMCI 7, DMT1 and DMT 2 contained with the adopted Hillingdon Local Plan Part 2 - Development Management Policies (January 2019) and Policies 3.12 and 5.2 of the London Plan (2016).'

G. That if the application is approved, the following conditions be attached:

1 COM3 Time Limit

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

FS0128-ALA-XX-XX-DR-L-0023 P01

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FS0128-CPM-01-02-DR-A-2003 P08
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FS0128-CPM-01-00-DR-A-2001 P08
Lighting plan D38481/LC/A
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FS0128-ALA-XX-XX-DR-L-0003 P07
FS0128-ALA-XX-XX-DR-L-0004 P08
FS0128-ALA-XX-XX-DR-L-0011 P09 sheet 1 of 3
FS0128-ALA-XX-XX-DR-L-0012 P11 sheet 2 of 3
FS0128-ALA-XX-XX-DR-L-0013 P09 sheet 3 of 3
FS0128-ALA-XX-XX-DR-L-0021 P04 net loss/ gain
FS0128-ALA-XX-XX-DR-L-0024 P03 building comparison
FS0128-ALA-XX-XX-DR-L-0027 P04
FS0128-ALA-XX-XX-DR-L-0028 P04
FS0128-ALA-XX-XX-DR-L-0029 P04
FS0128-ALA-XX-XX-DR-L-0002 P13

and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2016).

3 COM5 General compliance with supporting documentation

The development hereby permitted shall not be occupied until the following has been completed in accordance with the specified supporting plans and/or documents:

UK18.4283c - Phase II Geo Environmental Investigation
UK18.4283 Phase I Geo Environmental Study
Sequential assessment R002 V4
Agronomy Condition Assessment Audit
74867-CUR-00-XX-RP-TP-00001 V03 Transport assessment
19-1650.02_REP Site investigation and remediation report (CL)
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TX135263 NPS - Fire safety report Trenton
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Revised CEMP Rev C
FS0128_D&AS_Nanaksar_P13
19-2290.01 Revised Arboricultural Impact Assessment 2020-04-29 Issue 2
19-2290.01 Revised Arboricultural Method Statement 2020-04-29 Issue 2
19-2290.01 Revised Arboricultural Survey 2020-04-29 Issue 2
J3980A/1/F2 air quality assessment
FS0128-CUR-00-XX-RP-C-0003-V03 revised FRA

Planning statement R003 V4
74867-CUR-00-XX-RP-TP-00002-V03_Travel Plan
Topographical Survey (ref: 001 Rev A)
Biodiversity Phase 1 Habitat Survey (ref: 6726 J001039)
FS0128-CUR-00-XX-RP-C-0001 V03
FS0128-CUR-00-XX-RP-C-0002-V01

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

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2016).

4 COM9 Landscaping (car parking & refuse/cycle storage)

No works above ground level shall take place until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

1. Details of Soft Landscaping
 - 1.a Planting plans (at not less than a scale of 1:100),
 - 1.b Written specification of planting and cultivation works to be undertaken, including pollution absorbing planting where possible in order to provide further air quality mitigation
 - 1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate

2. Details of Hard Landscaping
 - 2.a Refuse Storage
 - 2.b Cycle Storage for 112 number of bicycles including 12 short-stay spaces located adjacent to the visitor entrance
 - 2.c Means of enclosure/boundary treatments
 - 2.d Car Parking Layouts for 50 vehicles (including demonstration that 5 spaces are served by active and 5 are served by passive electrical charging points and 3 dedicated blue badge spaces)
 - 2.e Hard Surfacing Materials
 - 2.f External Lighting
 - 2.g Other structures (such as play equipment and furniture)

3. Details of Landscape Maintenance
 - 3.a Landscape Maintenance Schedule for a minimum period of 5 years.
 - 3.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.

4. Schedule for Implementation

5. Other
 - 5.a Existing and proposed functional services above and below ground
 - 5.b Proposed finishing levels or contours

6. An Urban Greening Factor Assessment for the proposed development

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

approved details.

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies DMHB 11, DMHB 14, DMEI 1 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Policies 5.11 (living walls and roofs) and 5.17 (refuse storage) of the London Plan (2016) and policy G5 of the Mayors London Plan (intend to publish) 2019.

5 NONSC Servicing and delivery plan

Prior to occupation of the development hereby approved a Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority. This shall:

- i) rationalise the number of delivery and servicing trips, particularly during peak traffic periods;
- ii) ensure there is provision of adequate loading facilities;
- iii) ensure that the delivery space and time is actively controlled through a site booking plan; and
- iv) Provide details of measures which will be implemented to reduce neighbourhood impacts.

Operators should also be able to demonstrate their sustainability through membership of the Freight Operators Recognition Scheme (FORS) or similar.

REASON

To encourage out of hours/off peak servicing to help mitigate the site's contribution to local congestion levels in compliance with Policy DMT1 and DMT2 of the Local Plan: Part Two - Development Management Policies (2020).

6 NONSC Fire evacuation plan

No development shall proceed beyond the steel/timber/concrete superstructure (including roof structure) of any building proposed until a comprehensive fire emergency plan that demonstrates how disabled people will be safeguarded from fire and enabled to evacuate the building has been submitted to and approved in writing by the Local Planning Authority

REASON

To ensure that adequate facilities are provided for people with disabilities in accordance with Policy D12 of the emerging London Plan (Intend to Publish version 2019).

7 RES7 Materials (Submission)

Prior to above ground works detailed drawings or samples of all materials and external surfaces are submitted to and approved in writing by the local planning authority. The works shall not be carried out other than in accordance with the details so approved and shall thereafter be so maintained:

1.

- (a) Samples of materials
- (b) Details of parapets, cills, reveals, spandrel panels, safety railings
- (c) Detailed design of front and rear canopies
- (d) Details of railings and fencing
- (e) Details of substation

2. Sample panels of facing brickwork

Sample panels of facing brickwork showing the proposed colour, texture, facebond and

pointing shall be provided on site, and approved in writing by the local planning authority before the relevant parts of the approved works are commenced, and the sample panels shall be retained on site until the work is completed in accordance with the panel (s) so approved.

3. Elevational drawings at a scale of 1:20 and plan and vertical sectional drawings at a scale of 1:2 of the proposed windows and doors shall be submitted to and approved in writing by the local planning authority. The works shall be undertaken in accordance with the approved details.

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

REASON

To ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

8 NONSC Energy

Prior to above ground works, full specifications of the amount, type and location of the roof mounted PV array shall be submitted to and approved in writing by the Local Planning Authority. The specifications shall detail the PVs to be used and correspond with the savings set out in the energy strategy (Couch Perry Wilkes, April 2020). The specifications shall also include full details of the fixing mechanisms, orientation, pitch and maintenance regime.

Reason

To ensure the development contributes to a reduction in CO2 emissions in accordance with London Plan Policy 5.2

9 NONSC Energy

Prior to occupation, a detailed monitoring and reporting plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall provide full details of how the carbon savings set out in the energy strategy shall be monitored with details of how and when these will be reported to Local Authority. The submitted report shall demonstrate the carbon reduction proposals have been implemented and that the development is compliant with the savings set out in the energy strategy. Measures to remedy any shortfall in carbon savings will be required. The development must be operated in accordance with the approved plan.

Reason

To ensure the development contributes to a reduction in CO2 emissions in accordance with London Plan Policy 5.2

10 NONSC Ecology

Prior to above ground works, the following shall be submitted and approved in writing by the Local Planning Authority

(i) an ecological enhancement plan shall be submitted. The plan shall show dedicated area(s) (including the southern area bordering Minet Country Park) for the management of wildlife that can double as an outdoor learning space. The plan shall show the inclusion of a pond area for wildlife and educational purposes unless otherwise agreed in writing with the Local Planning Authority. The plan shall also include a diverse range of planting through an updated landscaping plan that has been developed to improve biodiversity.

Finally, the plan shall also show the inclusion of wildlife enhancement features (i.e. bat and bird boxes as well log piles) throughout the landscaped areas and within the fabric of the buildings. The development must proceed in accordance with the approved plan.

(ii) a plan showing the incorporation of living walls, screens and/or roofs in the new development (main building) shall be submitted to and approved in writing by the Local Planning Authority. The living walls, screens and/or roofs shall incorporate native nectar rich planting. The development must proceed in accordance with the approved plan.

Reason

To ensure the development incorporates measures to improve biodiversity in accordance with Policy EM7 of the Local Plan Part 1.

11 COM10 Tree to be retained

Trees, hedges and shrubs shown to be retained on the approved plan shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during construction, or is found to be seriously diseased or dying another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the Local Planning Authority. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs'

Remedial work should be carried out to BS 3998:2010 'Tree work - Recommendations' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. The agreed work shall be completed in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier.

REASON

To ensure that the trees and other vegetation continue to make a valuable contribution to the amenity of the area in accordance with policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020) and to comply with Section 197 of the Town and Country Planning Act 1990.

12 RES26 Contaminated Land

(1) All works which form part of the remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority (LPA) dispenses with any such requirement specifically and in writing. The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(i) No deviation shall be made from the proposed remediation scheme without the express agreement of the LPA .

(ii) Any required addendum to the proposed 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 by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

(iv) The results from chemical testing of imported soils shall be submitted to and approved in writing by the LPA.

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 Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

13 NONSC Crane operation plan

Prior to above ground works a Crane Operation Plan shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Ministry of Defence (RAF Northolt) and Heathrow Airport Limited. The submitted plan shall include details of:

- cranes and other tall construction equipment (including the details of obstacle lighting) - Such schemes shall comply with Advice Note 4 'Cranes and Other Construction Issues'(available at www.aoa.org.uk/policy-campaigns/operations-safety).

The approved Crane Operation Plan (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

REASON

In the interests of aircraft safety in compliance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).

14 NONSC Bird hazard management plan

Prior to above ground works, a Bird Hazard Management Plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with Heathrow Airport Limited and the Ministry of Defence. The submitted plan shall include details of:

- management of any flat roofs within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design'

The Bird Hazard Management Plan shall be implemented as approved and shall remain in force for the life of the building.

REASON

In the interests of aircraft safety in compliance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).

15 RES24 Secured by Design

The buildings and car parks alongside the associated play areas and sports facilities 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 shall be occupied until accreditation has been achieved.

REASON

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000, to ensure the development provides a safe and secure environment in accordance with policy DMHB 15 of the Local Plan Part 2 (2020) and London Plan (2016) Policies 7.1 and 7.3.

16 NONSC Imported soils

No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. All imported soils shall be tested for chemical contamination, and the results of this testing shall be submitted to and approved in writing by the Local Planning Authority.

REASON

To ensure that the occupants of the development are not subject to any risks from soil contamination in accordance with Policy DMEI 12 and DMEI 13 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

17 NONSC Sport England

Use of the development shall not commence until details of community use agreement has been submitted to and approved in writing by the Local Planning Authority. The agreement shall apply to the pitches, MUGAs, sports halls, studio space, changing and parking and include details of pricing policy, hours of use, access by non-educational establishment, management responsibilities and a mechanism for review, and anything else which the Local Planning Authority in consultation with Sport England considers necessary in order to secure the effective community use of the facilities. The development shall not be used at any time other than in strict compliance with the approved agreement.

REASON

To secure well managed safe community access to the sports facility/facilities, to ensure sufficient benefit to the development of sport in accordance with policy DMCI 3 of the Hillingdon Local Plan : Part 2 - Development Management Policies (2020).

18 NONSC Noise 1

The rating level of noise emitted from any plant and/or machinery installed shall be at least 5 dB below the existing background sound level. The noise levels shall be determined at the nearest noise sensitive receptors (i.e. the existing school). The measurements and assessment shall be made following the methodology of British Standard 4142:2014+A1:2019.

REASON

To safeguard the amenity of the surrounding area in accordance with policies DMHB11 of the Hillingdon Local Plan Part 2 (2020) and policy EM8 of the Local Plan Part 1 (2012).

19 NONSC Noise 2

The scheme shall meet acceptable internal noise design criteria and design guidance within BS 8233: 2014 - Guidance on sound insulation and noise reduction for buildings and the Institute of Acoustics & Association of Noise Consultants: Acoustics of Schools: a

design guide. The design and internal noise levels must take into account requirements for ventilation and cooling.

REASON

To safeguard the amenity of the surrounding area in accordance with policies DMHB11 of the Hillingdon Local Plan Part 2 (2020) and policy EM8 of the Local Plan Part 1 (2012).

20 NONSC Air Quality 1

All Non-Road Mobile machinery (NRMM) of net power of 37kW and up to and including 560kW used during the demolition, site preparation and construction phases shall comply with the emissions standards set out in chapter 4, proposal 4.3.3.a of the London Environment Strategy. Unless it complies with the standard set out in the London Environment Strategy, no NRMM shall be onsite, at any time, whether in use or not, without the prior written consent of the LPA. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register <https://nrmm.london/>

REASON

Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy

21 NONSC Air Quality 2

No works above ground-level works shall commence until details have been submitted to the LPA, in writing, demonstrating that any CHP or gas boilers used conform with the London Ultra Low NOx requirements as set out in the Mayor of London Sustainable Design and Construction SPG (or successor document).

REASON

Compliance with London Plan Policy 7.14 , Local Plan Part 1, Policy EM8, LB Hillingdon Local Plan Part 2, Policy DME1 14, Hillingdon AQAP 2019-2024,

22 NONSC Non Standard Condition

No development shall commence until a Reducing Emissions from Demolition and Construction Plan has been submitted to, and approved in writing by, the LPA. This must demonstrate compliance (drawn up accordance with) the GLA Control of Dust and Emissions from Construction and Demolition SPG (or any successor document).

REASON

To ensure compliance with London Plan 2016 Policy 7.14 and in accordance with Mayor of London "The Control of Dust and Emissions from Construction and Demolition (or any successor document).

23 RES22 Parking Management

Prior to first occupation of the premises a Parking Management Plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with Transport for London. The submitted plan shall set out how parking for staff, visitors and set down and pick up activities at the site will be safely and effectively managed.

The approved plan shall remain in place for perpetuity.

REASON

To help mitigate the site's contribution to local congestion levels in compliance with Policy DMT 1, DMT 2 and DMT 6 of the Local Plan: Part Two - Development Management

Policies (2020).

24 NONSC Waste Management

Prior to first occupation of the premises a Waste Management Plan shall be submitted to and approved by the Local Planning Authority. The plan shall include means of managing the movement of the bins from the bin store to within 10 metres of the refuse and recycling vehicle stopping point as indicated on the approved plans.

REASON

To ensure that the proposed development complies with Policy 5.17 of the London Plan (2016).

25 NONSC No additional floodlighting

There shall be no additional external lighting beyond that which is included within the approved plans.

REASON

In order to protect the wildlife and ecological habitats within close proximity to the site in accordance with Policy EM7 of the Local Plan Part 1 (2012).

26 NONSC Fire Strategy

The principles of the submitted Fire Strategy Report shall be implemented on site in conjunction with a suitably qualified consultant. Thereafter the development shall not be carried out other than in accordance with the approved details.

REASON

To ensure that adequate facilities are provided for people with disabilities in accordance with Policy D12 of the emerging London Plan (Intend to Publish version 2019).

27 NONSC Staggered Start and Finish times

The development hereby approved shall strictly operate and enforce the following staggered start and finish times for the lifetime of the development:

Reception - Year 2 9:15am-3:00pm

Year 3-4 9:00am- 3:15pm

Year 5-6 8:45am-3:30pm

At any time during the lifetime of the development, there must be a minimum of 3 start times with no less than 15 minute intervals.

REASON

To manage traffic flows and mitigate against congestion on the local highways network in accordance with Policy DMT 1 and DMT 2 of the Local Plan Part 2 (2020) and policy 6.12 of the London Plan (2016).

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 - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

LPP 5.1	(2016) Climate Change Mitigation
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.3	(2016) Sustainable design and construction
LPP 5.7	(2016) Renewable energy
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.15	(2016) Water use and supplies
LPP 6.1	(2016) Strategic Approach
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.9	(2016) Cycling
LPP 6.11	(2016) Smoothing Traffic Flow and Tackling Congestion
LPP 6.13	(2016) Parking
LPP 7.2	(2016) An inclusive environment
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.21	(2016) Trees and woodlands
LPP 8.2	(2016) Planning obligations
NPPF	National Planning Policy Framework
DMAV 1	Safe Operation of Airports
DMCI 1A	Development of New Education Floorspace
DMCI 2	New Community Infrastructure
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking

LPP 3.18	(2016) Education Facilities
LPP 3.6	(2016) Children and young people's play and informal recreation facilities
LPP 3.9	(2016) Mixed and Balanced Communities
LPP 7.18	(2016) Protecting open space and addressing deficiency
LPP 7.6	(2016) Architecture

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

To manage potential construction noise and vibration issues from works on the existing teaching spaces it is recommended that the works are conducted with a s.61 consent under the Control of Pollution Act 1974.

The development must comply with the guidance in Building Bulletin 93: Acoustic Design in Schools.

5

The proposed development shall have regard for:

- a) The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.
- b) Fixtures, fittings and furnishings, particularly hard materials should be selected to ensure that sound is not adversely reflected. The design of all learning areas should be considerate to the needs of people who are hard of hearing or deaf. Reference should be made to BS 8300:2009+A1:2010, Section 9.1.2, and, BS 223 in selecting an appropriate acoustic absorbency for each surface.
- c) Care should be taken to ensure that the internal decoration achieves a Light Reflectance Value (LRV) difference of at least 30 points between floor and walls, ceiling and walls, including appropriate door to ensure that doors and door furniture can be easily located by people with reduced vision.
- d) Induction loops should be specified to comply with BS 7594 and BS EN 60118-4, and a term contract planned for their maintenance.
- e) Care must be taken to ensure that overspill and/or other interference from induction loops in different/adjacent areas does not occur.
- f) Flashing beacons/strobe lights linked to the fire alarm should be carefully selected and installed to ensure they remain within the technical thresholds not to adversely affect people with epilepsy.

3. CONSIDERATIONS

3.1 Site and Locality

Guru Nanak Sikh Academy occupies an approximately 5 hectare irregularly shaped plot located on the southern side of Beaconsfield Road in Hayes. The main school buildings, which vary in height from single-storey to three-storeys, are located towards the north west of the site. A Multi-Use Games Area and playgrounds are located towards the south of the site and playgrounds are also located to the east of the main school building. Parking is provided along the western boundary. A drop off/pick up point for parents, accessed via Beaconsfield Road, and the school playing field occupy the eastern part of the site.

The school site is bounded to the north by Beaconsfield Road, beyond which are industrial buildings; to the east by Yeading Football Club; and to the south and west by Minet Country Park.

The part of the site the subject of these proposals comprises an approximately 1.52 hectare irregularly shaped plot, which currently comprises a large part of the existing school's playing fields and the existing drop-off/pick-up area. Planning permission was granted for the temporary provision of mobile classroom units and ancillary facilities on a part of this site, for a period of not more than three years, and these have been installed.

The entire school site falls within the Green Belt as designated in the Hillingdon Local Plan. Adjoining land to the east, west and south, including the adjoining football club, also falls within the Green Belt.

There is an oak tree in the north-east corner of the site which is protected by Tree Preservation Order (TPO) number 722.

Beaconsfield Road and the area beyond to the north fall within the Springfield Road Industrial and Business Area. The site and surrounding area also falls within the Hayes and West Drayton Corridor. The entire site falls within an Air Quality Management Area and Council records show the land to be contaminated.

3.2 Proposed Scheme

This application seeks full planning permission for the redevelopment of the existing temporary school to provide a new 3 storey, 4 forms of entry primary school with associated facilities.

The existing temporary huts would be demolished in the term, but for the interim construction period the existing students accommodated within designated areas of the Guru Nanak school building adjacent. Notwithstanding this it should be noted that the school has demonstrated a plan to open the new school in september for 2 new forms of entry (reception class) by submitting a seperate application for new temporary huts in a separate location to the south of the Guru Nanak site.

It must be noted that despite sharing a wider site the application site and adjoining secondary schools currently operate entirely independently of one another and will continue to do so.

Pupil and staff numbers:

At present, the school currently has a maximum capacity of 420 pupils (2FE) and it is understood that the school is currently oversubscribed each year meaning that they receive more applications in comparison to the number of places available. The proposal

seeks to increase the school's maximum capacity to 840 pupils (4FE).

In terms of staff numbers, post development completion and occupation, it is anticipated that there would be up to 70 full time equivalent (FTE) staff. This represents an increase of 40 staff members over existing numbers.

The proposed new building would continue to occupy the northern end of the site which currently accommodates the existing temporary huts and the school pick up and drop off point. The building would be a T shape with the bulk of the width extending east to west and the smaller depth which would run along the boundary shared with the Hayes and Yeading Football Club car park. The different sides of the T are also signified by the alteration in height as the section which tunnels along the boundary with the football club car park would be two stories and the proportion which extends east to west would be 3 stories.

At ground floor level this would accommodate various reception and year 1 classrooms; flexible halls & dining cluster with associated kitchen & servery; paired reception rooms with external terraces; a reading corner; dedicated halls and outdoor WC core and the school main entrance suite. At first floor level it would accommodate shared practical & resource cluster; food tech resource; ICT suite; central staff room; Years 2 & 3 classrooms; plant provision and server room. The third floor would accommodate the classrooms for Years 4, 5 & 6; a staff work room and a sedum roof over the main hall.

Externally, playgrounds and social interaction areas would adjoin the building to the south, beyond which are a number of Multi-Use Game Area's (MUGA), an artificial grass pitch and further south is the remaining portion of the existing school playing field.

Given that there is an existing primary school on site accommodated within the temporary huts fronting Beaconsfield Road there is existing vehicular access from Beaconsfield Road. The access is designed to permit vehicles into the front car park at the eastern end of the frontage and vehicles will exit via the western end of the frontage. This would provide direct access to the staff only car park (27 bays) and a drop off only area (23 bays).

A bin store has been sited close to the loading bay on the eastern edge of the site for easy access by refuse collectors and would be bound by solid timber fencing to ensure the bin area remains discrete. This would also be located near the main covered cycle parking for which there is a total of 72 spaces proposed.

Existing boundary fencing, which it was observed on site comprises 2.1m high galvanised steel blunt-topped palisade fence which is in good condition, would be retained. A variety of different fencing would be used across various locations within the site and these comprise of 2m height timber closeboard fencing, 2.4m height weldmesh fencing, 3m rebound height weldmesh fencing (AGP), 1.2m height bow top fencing (MUGA).

A proportion of the existing playing field would be removed in order to accommodate the playground space, MUGA and AGP associated with the primary school. The quantum and quality of the replacement sports areas (MUGA & AGP) combined with the proportion of the playing field which will remain, is considered to be acceptable.

Detailed landscaping plans have been provided and the landscape masterplan indicates that sufficient levels of tree planting will be provided across the site including fruit trees in the front area to break up an area which is dominated by hard surfacing. It also indicates that planting would be provided within the car park, around the building and within the

playground/social areas.

Community Use:

The submission includes a draft Community Use Agreement which outlines the intention to make the sports pitches/areas available for public use outside of the core school hours. The Planning Statement & Design and Access Statement confirms that external sports facilities will also be made available outside of school core time during evenings, weekends and holiday periods. Whilst it is noted that Sport England have raised concerns regarding the time frame for which these areas will be made available the operating hours will be restricted to daylight hours and this is due to floodlighting restrictions resultant of the ecological impacts that would be brought forward given the close distance to the ecological and river corridor within close distance to the southern boundary of the site.

Sports Use:

The site currently comprises extensive playing fields. Where playing fields and pitches would be lost as a result of the development proposals a proportion would be replaced by the multi use games pitches and the artificial grass pitch which are indicated on the proposed site plan. The applicant has submitted a document which outlines the net loss of the playing field and whilst this is regrettable the re-provision is considered to balance the harm of this loss.

3.3 Relevant Planning History

4450/APP/2013/1227 Land Adjoining Guru Nanak Sikh Academy Beaconsfield Road Hayes
Provision of three temporary modular classroom/administration units, substation, car/cycle parking, new access arrangements and ancillary development (Amended Plan).

Decision: 28-06-2013 Approved

4450/APP/2014/1427 Land Adjoining Guru Nanak Sikh Academy Beaconsfield Road Hayes
Provision of three temporary modular classroom/administration units, substation, car/cycle parking, new access arrangements and ancillary development on existing school site.

Decision: 16-06-2014 Approved

4450/APP/2014/2725 Guru Nanak Sikh College Springfield Road Hayes
Details pursuant to conditions 7 (parking and cycle storage), 8 (drop-off/pick-up facility) and 10 (noise levels) of planning permission ref. 4450/APP/2014/1427 (Provision of three temporary modular classroom/administration units, substation, car/cycle parking, new access arrangement and ancillary development on existing school site)

Decision: 02-10-2014 Approved

4450/APP/2016/1928 Nanaksar Primary School Springfield Road Hayes
Variation of conditions 1 and 2 of planning permission ref: 4450/APP/2014/1427 dated 16/06/14 (Provision of three temporary modular classroom/administration units, substation, car/cycle parking, new access arrangements and ancillary development on existing school site) to extend the use until 31st August 2017.

Decision: 20-07-2016 Approved

4450/APP/2016/2277 Guru Nanak Sikh Academy Springfield Road Hayes
Perimeter security fencing and gates

Decision:

4450/APP/2017/1318 Nanaksar Primary School Springfield Road Hayes

Variation of conditions 1 and 2 of planning permission ref: 4450/APP/2016/1928 dated 28/07/20 (Provision of three temporary modular classroom/administration units, substation, car/cycle parking, new access arrangements and ancillary development on existing school site) to extend the temporary use.

Decision: 07-06-2017 Approved

Comment on Relevant Planning History

The site has an extensive planning history which is interlinked with the Guru Nanak senior school. Most relevant to this scheme is a set of applications which were submitted between 2013 and 2016 for the construction of 3 temporary buildings (modular units) which accommodate the existing 2FE school. Consent was originally granted in 2013 for a temporary 1 year period as the intention was that a full application would be submitted for the construction of a permanent building. Further consent was agreed to extend this date via various s73 applications since this 2013 and most recently 2017 where the expiry of the temporary permission was extended to 30/09/20.

The application site has also been subject to extensive pre-application discussions.

4. Planning Policies and Standards

London Borough of Hillingdon Development Plan (from 6th April 2020)

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

1.2 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)

West London Waste Plan (2015)

The London Plan - Consolidated With Alterations (2016)

1.3 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

1.4 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 (Intend to Publish Version, December 2019)

1.5 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. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October 2019.

1.6 The Mayor has considered the Inspectors' recommendations and, on 9th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for the Inspectors' recommendations that the Mayor did not wish to accept. The Secretary of State responded on the 13th March 2020 and stated that he was exercising his powers under section 337 of the Greater London Authority Act 1999 to direct that modifications are required. These are set out at Annex 1 of the response, however the letter does also state that if the Mayor can suggest alternative changes to policies that would address the concerns raised, these would also be considered.

1.7 More limited weight should be attached to draft London Plan policies where the Secretary of State has directed modifications or where they relate to concerns raised within the letter. Greater weight may be attached to policies that are not subject to modifications from the Secretary of State or that do not relate to issues raised in the letter.

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.EM5 (2012) Sport and Leisure
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation

Part 2 Policies:

- LPP 5.1 (2016) Climate Change Mitigation
- LPP 5.2 (2016) Minimising Carbon Dioxide Emissions

LPP 5.3	(2016) Sustainable design and construction
LPP 5.7	(2016) Renewable energy
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.15	(2016) Water use and supplies
LPP 6.1	(2016) Strategic Approach
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.9	(2016) Cycling
LPP 6.11	(2016) Smoothing Traffic Flow and Tackling Congestion
LPP 6.13	(2016) Parking
LPP 7.2	(2016) An inclusive environment
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.21	(2016) Trees and woodlands
LPP 8.2	(2016) Planning obligations
NPPF	National Planning Policy Framework
DMAV 1	Safe Operation of Airports
DMCI 1A	Development of New Education Floorspace
DMCI 2	New Community Infrastructure
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists

DMT 6 Vehicle Parking
LPP 3.18 (2016) Education Facilities
LPP 3.6 (2016) Children and young people's play and informal recreation facilities
LPP 3.9 (2016) Mixed and Balanced Communities
LPP 7.18 (2016) Protecting open space and addressing deficiency
LPP 7.6 (2016) Architecture

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **18th March 2020**

5.2 Site Notice Expiry Date:- Not applicable

18th March 2020

6. Consultations

External Consultees

42 letters were sent to local neighbouring properties and a press advert placed to advertise the development. Both methods of consultation expired 19-05-20.

1 comment was received raising concerns with the lack of parking control within drop off and pick up times. These comments are addressed in the Highways section of the report.

GREATER LONDON AUTHORITY

Strategic issues summary:

Principle of development:

The nature and scale of the proposal would make it inappropriate development in the Green Belt given that it is materially larger than the existing temporary school building and does not meet any of the NPPF exception tests. However, the very special circumstances put forward including: educational need, co-location, and enhanced provision of sports facilities and community uses could outweigh the potential harm that would be caused to the Green Belt, but further information is needed on these matters and lack of alternative sites. The loss of part of the playing field must be robustly justified and mitigated. A community use agreement, which robustly secures the use of the school's facilities outside core hours must also be submitted (paragraphs 14 to 29).

Urban design and inclusive access: Further design work is required related to architectural quality, massing and elevations, amenity space and soft play areas (paragraphs 30 to 34). Sustainable development: Further clarification is required on carbon emission and the factors used, maximising PV, heat pumps and overheating risk (paragraphs 35 to 37).

Noise and air quality:

A robust assessment and further mitigation measures must be submitted prior to any stage 2 referral (paragraph 38). Transport: There are significant concerns over the safety of pupils, as well as increased congestion caused by the car centric proposal. An approach that looks to manage and reduce parking and vehicle movements across all three schools is therefore strongly recommended. Significant further work is required on several matters including impact assessment, mode share, Vision Zero, Healthy Streets, and increasing cycle parking (paragraphs 39 to 52).

Recommendation

That Hillingdon Council be advised that the application does not fully comply with the London Plan and the Mayor's Intend to Publish London Plan for the reasons set out in paragraph 56 but that the possible remedies set out in that paragraph could address these deficiencies. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission

Context

1. On 27 February 2020, the Mayor of London received documents from Hillingdon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the Mayor's intend to publish London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's consideration in deciding what decision to make.

2. The application is referable under Category 3D of the Schedule to the Order 2008:

· "Development - (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floor space of more than 1,000 square metres or a material change in the use of such building."

3 Once Hillingdon Council has resolved to determine the application, it would normally be required to refer it back to the Mayor for his decision as to whether to direct refusal or allow the Council to determine it itself. In this instance, the Council does not need to refer the application back to the Mayor.

4. The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5. The application site is entirely located within Green Belt, and part of the site is a playing field. The site is also located within an Air Quality Management Area (AQMA). The site is not located in a Conservation Area, nor is it constrained by designated heritage assets. The site is part-located in Flood Zone 2 as a result of being located in close proximity to the Grand Union Canal.

6. Currently, there is a temporary accommodation for a Sikh Community Nanaksar primary school on site with a floor space of approximately 400 square metres, which was opened in 2009. Adjacent to the site on the western boundary, there is a 5-FE secondary school with 750 pupils and a 2-FE primary school with 420 pupils, both operating as Sikh Community Nanaksar Schools.

7. The development site is located on Beaconsfield Road which forms the northern boundary, with Hayes & Yeading United Football Club, Minet Country Park and the existing schools forming the remaining site boundaries. Beaconsfield Road connects with Springfield Road and the A4020 Uxbridge Road, approximately 250 metres east of its junction with the TLRN (A312 The Parkway). Uxbridge Road is served by bus routes 207 and 407 during the day and overnight by the N207. Consequently, the site has a public transport accessibility level (PTAL) of 0 on a scale of 0-6b, where 6b is highest. Pedestrian facilities near the site includes footways on either side of Springfield and Beaconsfield Road, and recently installed zebra crossings on Beaconsfield Road and Springfield Road. The local cycle network includes a dedicated on-footway cycle path along the southern side of Uxbridge Road (A4020).

Details of the proposal

8. Full planning permission is being sought for construction of a new 3-storey 4FE primary school (to replace an existing temporary primary school) with associated hard and soft landscaping, outdoor sports provision, and new access arrangement.

Case history

9. A pre-application meeting was held at City Hall involving GLA officers and the applicant team on the above proposed development on 30 January 2020, and subsequently advised the applicant to fully demonstrate the need for such a large-sized permanent school in this location and to address other strategic issues related to urban design, sustainable development, noise and air quality, and transport in the forthcoming statutory planning application.

10. In June 2014, planning permission was granted for construction of the existing temporary primary school involving three temporary modular classroom/administration units, which due to its scale and size, was not referable to the Mayor. Strategic planning issues and relevant policies and guidance

11. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the 2012 Hillingdon Local plan: Part 1: Strategic Policies, and the 2016 London Plan (Consolidated with Alterations since 2011).

12. The following are also relevant material considerations:

- The National Planning Policy Framework 2019 and National Planning Practice Guidance.
- The Mayor's Intend to Publish London Plan (December 2019), which should be taken into account on the basis set out in the NPPF.

On 13 March 2020, the Secretary of State issued a set of Directions under Section 337 of the Greater London Authority Act 1999 (as amended) and, to the extent that they are relevant to this particular application, have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation.

- Hillingdon emerging Local Plan: Part 2, the public examination hearings were closed on 9 August 2018.

13. The relevant strategic issues and corresponding policies are as follows:

- Green Belt/playing fields London Plan; Intend to Publish London Plan;
- Urban and inclusive design London Plan; Intend to Publish London Plan; Accessible London: achieving an inclusive environment SPG;
- Sustainable development London Plan; Intend to Publish London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;
- Noise and air quality London Plan; Intend to Publish London Plan; Mayor's Environment Strategy;

Principle of development

14. The Policy 7.16 of the London Plan, Policy G2 of the Intend to Publish London Plan, and the NPPF stress that the strongest protection should be given to Green Belt and that inappropriate development should be refused, except in very special circumstances. Paragraph 143 of the NPPF states that inappropriate development is, by definition, harmful to Green Belt and should not be approved except in 'very special circumstances' (VSCs). Paragraph 144 of the NPPF sets out that, when determining applications, LPAs "should ensure that substantial weight is given to any harm to the Green Belt and states that 'very special circumstances' will not exist unless the potential harm to Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations".

15. The nature and scale of the proposed development would make it inappropriate development in the Green Belt given that it is materially larger than the existing temporary school building and does not meet any of the NPPF exception tests, and it should therefore not be approved except in very special circumstances. The applicant is therefore required to set out the very special circumstances that would outweigh the harm to the Green Belt.

Officer Note: There is no para 16 in the GLA response.

Impact on openness

17. As shown in the table below, the proposed development is much larger than the existing built form in terms of height, footprint, floor space, massing and extent of development on site. This is principally due to the applicant's aim to accommodate more pupils than the existing temporary school accommodates. This inappropriate development would have impact on the openness of the Green Belt, therefore very special circumstances case must be demonstrated to justify its development.

Other harm associated with the inappropriate development on Green Belt

18. Part of the proposed development will be located on the southern side of the site which is a playing field. The proposal would cause a loss of 19% (1,920 square metres) of the existing playing field area. Therefore, it is essential that the harm associated with the loss of the playing field is minimised as far as possible, with any residual impact mitigated fully through appropriate measures.

Very special circumstances

19. The applicant has acknowledged that the proposal is inappropriate development and has set out its case for very special circumstances (VSCs) that might justify the inappropriate development.

These are:

- Educational need,
- Lack of alternative sites,
- Co-location, and
- Enhanced provision of sports facilities and community benefits

Table of built-form comparison: existing vs proposed

Development Footprint (sq.m.) Floor space (sq.m.) Height (m.)
- Proposed 1,793 3,795 12.3
- Existing 409 380 3.7
- Difference (%) 1,384 +(338%) 3,415 +(899%) 8.6 +(232%)

GLA officers' assessment regarding principle of development and VSCs case

Educational need

20. Given that the proposal to increase the number of pupils is the main driver for the significantly increased size of the proposed primary school within Green Belt, a robust justification in terms of need is key to the applicant's very special circumstances case. Given that the proposed school would be a faith-school, the applicant has submitted a detailed educational need assessment report for a Sikh-faith primary school places in the school's catchment area. The report has demonstrated that there is a compelling educational need for pupils from the Sikh community in the catchment area (within a 3-mile radius). Therefore, this is accepted as a very special circumstance.

Lack of alternative sites

21. The applicant submitted an assessment of potential alternative sites which were assessed against a range of criteria; including size (minimum area of 0.65 hectares), site suitability, availability, planning constraints, and location (within a 3-mile radius), which includes sites in Hillingdon and Ealing. Over sixty potential sites (28 of them brownfield) were assessed and the reasons why the current application site was selected and the rest of the potential sites were rejected were set out. Whilst the submitted report is comprehensive, GLA officers have not been able to verify its conclusions and would welcome further discussion with the applicant and Hillingdon Council prior to any stage 2 referral regarding the scope of the site selection process, and the assumptions underpinning the shortlisting process that was undertaken. The views of Hillingdon Council planning officers on the adequacy of the site search should also be provided.

Co-location

22. A number of potential sites have been considered as mixed-use and/or colocation with other schools and discussed with the respective owners and developers. However, no agreement was reached to enable a co-location solution on those potential sites.

23. Notwithstanding the above, the applicant has successfully demonstrated the benefits of co-location with the existing Nanaksar Sikh Community schools on the adjacent site, which include the sharing of educational and sports facilities. It is also noted that the instances where there has been a successful free school delivered as part of a mixed-use and/or co-location scheme have been mostly primary school situations. Therefore, the benefit of co-location with the existing Sikh-faith schools is accepted as a very special circumstance.

Provision of enhanced sports facilities and community benefits

24. Whilst there is strong strategic support for the provision of enhanced sports facilities, in the first instance, the loss of part of the playing field must be justified and support from Sport England should be sought. Although it is noted that there will be apartial access to the new facilities, as the sports hall would be used for income generation by renting the hall for wedding events, full details of the proposed community benefits package should be submitted. In addition, Sport England should beinvolved in the drafting of the community use agreement.

25. Notwithstanding the above, the case for enhanced sports facilities and community benefits could be a very special circumstance, if the applicant were to clearly set out how the enhanced sport facilities would be accessible and affordable to the local community, and to other schools and sport clubs in a draft community use agreement, which should be submitted prior to any stage 2 referral.

Conclusion

26. The nature and scale of the proposal would make it inappropriate development in the Green Belt given that it is materially larger than the existing temporary primary school building and does not

meet any of the NPPF exception tests. However, the very special circumstances put forward including: educational need, co-location, and enhanced provision of sports facilities and community uses could outweigh the potential harm that could be caused to the Green Belt, but further information is needed on these matters and lack of alternative sites. A community use agreement, which secures the use of the school's facilities outside core hours must be submitted.

27. The applicant's lack of alternative sites conclusion should be verified by the council planning officers, and any other harm resulting from the proposed inappropriate development within Green Belt (in this case the loss of part of the playing field) must be robustly justified and mitigated, and accepted by Sport England.

Equal opportunities for all

28. Paragraph 3.5 of the London Plan Policy 3.1 'Ensuring equal life chances for all' states that, 'It is important that the needs of all in society, such as faith groups, are addressed - if necessary through co-ordinated action with neighbouring boroughs'. Likewise, Paragraph 3.88 of Policy 3.16 'Protection and enhancement of social infrastructure' of the London Plan sets out that, 'Boroughs and local strategic partnerships have a key role in bringing together the different parts of the public, private, community and voluntary sectors to tackle priority issues including health, education, lifelong learning, community safety, housing and transport infrastructure, and access to social, leisure and cultural activities through community strategies, local strategies and agreements and other policy tools.'

29. In light of the above, the proposed Sikh-faith school, would address the needs of a faith group and promote London Plan's equal opportunity objectives. Therefore, the provision of a new school is supported in the context of Policy 3.1 of the London Plan.

Urban design

30. Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 and the Mayor's

Intend to Publish London Policy D1 set out a series of overarching design principles for development in London. The applicant's design and access statement has been assessed as follows.

31. The design is not high-quality and does not demonstrate mitigation measures are utilised in relation to impact on the openness of a Green Belt site. Whilst the proposed internal layout is functional, massing and materiality do not recognisably acknowledge the site's Green Belt context. South facing classrooms have canopies as mitigation against overheating and to provide shading, which is welcomed. The main entrance block is located some way from the street entrance which is not ideal, and the scheme's car dominant design should be revisited. Car parking and waiting areas also dominate the public realm of the site in terms of area and proportions and it is not clear whether this is a permanent design approach or would be reduced over time. Further clarification is therefore required in this respect.

32. An informal landscape is proposed, with incidental planting which is welcomed. However, the applicant should consider incorporating formal soft standing play areas as the landscape strategy is currently dominated by wide areas of hardstanding. The proposed orchard planting is a positive move and could be expanded upon to run throughout the application site.

Fire safety and resilience

33. In accordance with Policy D12 'Fire safety' of the Mayor's Intend to Publish London Plan, all major development proposals should be submitted with a Fire Safety Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The Council should ensure this statement is submitted, shared with GLA officers and secured through appropriate planning conditions and/or S106 clauses.

Inclusive access

34. The applicant has submitted a design and access statement as part of the planning application,

demonstrating that the development complies with inclusive access Policy 7.2 of the London Plan and Policy D5 of the Mayor's Intend to Publish London Plan, Accessible London SPG and Approved Document M of the Building Regulations and BS8300:2009. The statement demonstrates that inclusiveness is incorporated into all elements of the proposed development including the provision of three blue badge parking spaces, which is welcomed.

Sustainable development

Energy

35. The London Plan's Energy Hierarchy has been followed, and the proposed energy strategy is generally supported. However, the applicant should submit additional information to ensure compliance with Policy 5.2 of the London Plan and Policy SI.2 of the Mayor's Intend to Publish London Plan. For the purposes of this assessment, the applicant should work out the CO2 emission performance against London Plan policies using the SAP 10 emissions factors and advise which one is chosen.

36. The applicant has submitted the GLA's Carbon Emission Reporting spreadsheet, which is welcomed. However, under the lean, clean and green scenarios, the reported Building Energy Rating (BER) does not match the calculated one and therefore the figures provided cannot be verified at this stage. Therefore, the applicant should ensure that the spreadsheet is updated and that the correct version is submitted for further assessment. The carbon emissions reduction estimates should be updated accordingly, though currently it is estimated as a 46% carbon reduction.

37. Detailed comments have been provided separately to the applicant and the Council, and includes the following matters:

- The reported carbon emissions are not accurate.
- There is no clarity on which carbon factors are used.
- PV should be maximised.
- Be lean performance is very low and must be revisited.
- Further information is required on the proposed Heat Pumps as a means of low carbon heat supply.
- Further measures should be considered to reduce the overheating risk.

Noise and air quality

38. Given the site is within an AQMA, the air quality assessment report is essential to allow officers to assess the planning application in this context. The submitted reports regarding noise and air quality do not demonstrate the development is Air Quality Neutral, and further work is required to assess the air quality and noise impacts. A robust assessment and further mitigation measures must be submitted for further assessment prior to any stage 2 referral.

Transport

Access, Active Travel Zone and Healthy Streets

39. A dedicated pedestrian gate in Beaconsfield Road serves as the primary pedestrian access. This is the most suitable location in terms of minimising conflicts with vehicles entering and exiting the car park. However, an increase in vehicle trips and drop-off/pick-up activity in Beaconsfield Road is likely to increase exposure to poor air quality and is contrary to the Mayor's target of 80% of trips by active and public transport modes (Intend to Publish London Plan Policy T1). Complementary safety measures for pedestrians should include a school crossing patrol at the zebra crossing during drop-off and pick-up periods.

40. Cycle access is via a dedicated gate and path at the eastern boundary of the site. The location is the most convenient for access to the cycle store, however, there is no formal (existing or proposed) crossing facility for cyclists and the absence of parking controls on the north side of Beaconsfield Road is likely to contribute to reduced intravisiability between cyclists and vehicles and thus increase road danger. This is contrary to the Mayor's Vision Zero ambition.

41. The Hillingdon Highway Improvement scheme at Appendix C of the Transport Assessment is noted and may offer some improvements to the quality of the pedestrian and cyclist environment but clarity is needed as to whether this scheme will include the removal of parking on the northern side of Beaconsfield Road.

42. The existing one-way system through the car park will be retained. The applicant has demonstrated through a swept path analysis that the access points can accommodate the largest vehicles expected to access the site.

Vision Zero

43. According to the accident analysis, a total of 41 accidents were recorded between 2016 and 2018 in the area. Most of these accidents involved collisions of vehicles, except for a collision involving a pedal cyclist and light goods vehicle at

Uxbridge Road junction with Springfield Road. It is noted that that since these accidents Hillingdon Council has implemented new zebra crossings in Springfield Road and Beaconsfield Road. However, these recent improvements sought to address existing safety issues and the proposal will create new road dangers such as the potential for increased conflict between active modes and vehicles in Beaconsfield Road which needs to be mitigated. As it stands, the proposal is not compliant with the Mayor's Vision Zero.

Car parking

44. Twenty-seven car parking spaces (including three Blue Badge spaces) are proposed for staff - equating to 38% of staff. This is considerably lower than the percentage of staff who currently travel by car - 93% according to the 2019 Travel Survey. However, given the availability of unrestricted on-street parking and the lack of public transport options, it is unlikely that travel behaviour will change. The submitted parking beat survey appears to reinforce this - demonstrating that the current on-street capacity can absorb an uplift in demand.

45. An additional twenty-three parking spaces are provided exclusively for dropoff/ pick-up, except for three Blue Badge spaces and delivery and servicing outside of drop-off/pick-up periods. In theory, the provision of off-street drop-off/pick-up facilities should ease the current traffic congestion in Beaconsfield Road, but TfL is concerned that the forecasted increase in vehicle trips will lead to an increase in on-street dropoff/ pick-up and thus exacerbate the current unsatisfactory situation. An approach that looks to manage and reduce parking and vehicle movements across all three schools is therefore strongly recommended.

46. Final arrangements for managing, monitoring and enforcing the car park should be detailed in Car Park Management Plan (CPMP), secured by legal agreement. The provision of 10% active and 10% passive EVCP is welcomed.

Cycle parking

47. Sixty sheltered cycle parking spaces and twelve Sheffield stands are included. Visitor cycle parking spaces accords with the Intend to Publish London Plan Policy T5. However, a total of 112 long-stay cycle parking spaces are required (Table 10.2 recommends 1 space per 8 FTE staff and 1 space per 8 students). The applicant must therefore clarify how the cycle parking spaces will be accommodated.

Impact assessment

48. The trip generation analysis calculates an uplift of 352 and 282 two-way vehicle trips in the AM and PM peaks, respectively. The uplift in vehicle trips is more than double the baseline and the Transport Assessment (at Table 7.5) finds that development traffic will account for a 24% and 22% increase in traffic in Springfield Road. However, a junction capacity assessment has not been undertaken and as such the conclusion that the development will have no significant network impacts is premature. As a minimum, an assessment of Springfield Road/Uxbridge Road junction should be undertaken. Furthermore, the application site is part of a wider site that accommodates a secondary school with a pupil population of circa 1,243, the majority of whom travel by car. A large proportion of trips are likely to be shared by the primary and secondary school, and as such a

combined assessment should be undertaken. TfL will await an updated assessment to further comment on the transport impacts of the proposal.

49. Given that the site records a PTAL of 0 and has very poor access to public transport, TfL expects that improvements to public transport services should form part of the mitigation package for this development, if a significant shift away from cars is to be achieved. It is noted that the applicant will investigate the feasibility of a school bus. However, given that this is being considered as a measure to reduce car trips, the details must be presented for inspection by TfL and the Council prior to any planning consent; and this will need to be secured through legal agreement.

Delivery and Servicing and Construction Logistics Plans

50. A delivery and servicing plan (DSP) and construction logistics plan (CLP) will need to be secured by legal agreement.

Travel Plan

51. The mode share targets for car and car share indicate that cars will remain the dominant mode of travel to the site. A greater reduction in the mode share for cars should therefore be pursued to minimise the traffic and safety impacts of the development. The travel plan should therefore be revised to include more stringent measures to reduce car travel. Should the proposal be granted planning consent, TfL officers will expect the school to apply for STARS accreditation as stated. The final travel plan should be secured by legal agreement.

Summary

52. There are significant concerns over the safety of pupils, as well as the increased congestion caused by the car centric proposal. Significant further work is required on several matters including impact assessment, mode share, Vision Zero, Healthy Streets, and increasing cycle parking. An approach that looks to manage and reduce parking and vehicle movements across all three schools is therefore strongly recommended. Local planning authority's position

53. Hillingdon Council's planning officers are reviewing the scheme, and it will likely go to the Council's planning committee meeting in May 2020.

Legal considerations

54 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the

Mayor's statement and comments.

Financial considerations

55. There are no financial considerations at this stage.

Conclusion

56. London Plan and the Mayor's Intend to Publish London Plan policies on Green Belt, education, sports facilities, community use, urban design, inclusive access, noise and air quality, sustainable development, and transport are relevant to this application. The application complies with some of these policies but not with others as set out below:

- Principle of development: The nature and scale of the proposal would make it inappropriate development in the Green Belt given that it is materially larger than the existing temporary school building and does not meet any of the NPPF exception tests. However, the very special

circumstances put forward including: educational need, co-location, and enhanced provision of sports facilities and community uses could outweigh the potential harm that would be caused to the Green Belt, but further information is needed on these matters and lack of alternative sites. The loss of part of the playing field must be robustly justified and mitigated. A community use agreement, which robustly secures the use of the school's facilities outside core hours must also be submitted.

- Urban design and inclusive access: Further design work is required related to architectural quality, massing and elevations, amenity space and soft play areas.
- Noise and air quality: A robust assessment and further mitigation measures must be submitted prior to any stage 2 referral.
- Sustainable development: Further clarification required on carbon emission and the factors used, maximising PV, heat pumps and overheating risk.
- Transport: There are significant concerns over the safety of pupils, as well as the increased congestion caused by the car centric proposal. An approach that looks to manage and reduce parking and vehicle movements across all three schools is therefore strongly recommended. Significant further work is required on several matters including impact assessment, mode share, Vision Zero, Healthy Streets, and increasing cycle parking.

TRANSPORT FOR LONDON

Site Description

The application site is located in Hayes and is bound by Beaconsfield Road to its north, Minet Country Park to its south, Yeading United Football Club to the east and Guru Nanak primary and secondary schools to the west.

The application site records a public transport access level (PTAL) of 0, on a scale of 0 to 6b, where 6b is the greatest. There are two bus routes (207 and 427) operating in the vicinity with the nearest bus stop at approximately 650m on Uxbridge Road, to the north of the site, accessed via Springfield Road. There are no rail services within walking distance of the site, but it is noted that Hayes & Harlington and Southall stations are approximately 1.5kms "as the crow flies" distance to the southwest and southeast of the site, respectively.

The nearest part of the Transport for London Road Network (TLRN) is A312 The Parkway, approximately 900m from the site, accessed via Uxbridge Road to the north. Uxbridge Road (A4020) forms part of the Strategic Road Network (SRN). Uxbridge Road is a dual carriageway with a speed limit of 40mph. Beaconsfield Road and Springfield Road are part of the Local Road Network (LRN) and are single carriageway roads with a speed limit of 30mph.

Pedestrian facilities near the site includes footways on either side of Springfield and Beaconsfield Road, recently installed zebra crossings on Beaconsfield Road and Springfield Road. The local cycle network includes a dedicated on-footway cycle path along the southern side of Uxbridge Road (A4020).

Access, Active Travel Zone and Healthy Streets

A dedicated pedestrian gate in Beaconsfield Road serves as the primary pedestrian access. This is the most suitable location in terms of minimising conflicts with vehicles entering and exiting the car park. However, an increase in vehicle trips and drop-off/pick-up activity in Beaconsfield Road is likely to increase exposure to poor air quality, which is contrary to the Mayor's target of 80% of trips by active and public transport modes (Intend to Publish London Plan Policy T1). Complementary safety measures for pedestrians should include a school crossing patrol at the zebra crossing during drop-off and pick-up periods.

The deployment of a drop-off/pick-up warden is welcomed. However, it should be clarified that the school crossing patrol and the drop-off/pick-up warden are separate entities and it is assumed that the school (working collaboratively with the Council regarding the school crossing patrol) will deploy both. These measures will contribute to mitigating the road safety and air quality impacts envisaged, but we expect these measures to be articulated with travel plan targets and measures to reduce car travel and secured by legal agreement.

Cycle access is via a dedicated gate and path at the eastern boundary of the site. The location is the most convenient for access to the cycle store, however, there is no formal (existing or proposed) crossing facility for cyclists and the absence of parking controls on the north side of Beaconsfield Road is likely to contribute to reduced inter-visibility between cyclists and vehicles and thus increase road danger. This is contrary to the Mayor's Vision Zero ambition.

The Hillingdon Highway Improvement scheme at Appendix C of the Transport Assessment is noted and may offer some improvements to the quality of the pedestrian and cyclist environment but clarity is needed as to whether this scheme will include the removal of parking on the northern side of Beaconsfield Road. This will at least demonstrate some compliance with TfL Healthy Streets approach (Intend to Publish London Plan Policy T2).

TfL will comment further when we are informed of the outcome of the discussion with the Highway Authority.

Vehicular access is afforded via the existing access points in Beaconsfield Road and the existing one-way system through the car park will be retained. The applicant has demonstrated through a swept path analysis that the access points can accommodate the largest vehicles expected to access the site.

Vision Zero

According to the accident analysis, a total of 41 accidents were recorded between 2016 and 2018. Most of these accidents involved collisions of vehicles, except for a collision involving a pedal cyclist and light goods vehicle at Uxbridge Road junction with Springfield Road. It is noted that since these accidents Hillingdon Council has implemented new zebra crossings in Springfield Road and Beaconsfield Road. However, these recent improvements sought to address existing safety issues. The proposal will create new road dangers such as the potential for increased conflict between active modes and vehicles in Beaconsfield Road, and this needs to be mitigated. As it stands, the proposal is not compliant with the Mayor's Vision Zero.

We will await the outcome of the discussions with the Highway Authority to comment further but to be clear TfL is expressing concern that the predicted increase in vehicles trips to the school and consequently the increased levels of vehicle drop-off/pick-ups in Beaconsfield Road may create additional road safety issues, such as vehicle-pedestrian conflicts near the main entrance. We would like appropriate mitigation to be identified and implemented. The deployment of a school crossing patrol, drop-off/pick-up warden and school bus/es could form part of the mitigation.

Car Parking

27 car parking spaces (including 3 Blue Badge spaces) are provided for staff - equating to 38% of staff. This is considerably lower than the percentage of staff who currently travel by car - 93% according to the 2019 Travel Survey. However, given the availability of unrestricted on-street parking and the lack of public transport options, it is unlikely that travel behaviour will change. The parking beat survey appears to reinforce this - demonstrating that the current on-street capacity can absorb an uplift in demand.

An additional 23 parking spaces are provided exclusively for drop-off/pick-up, except for 3 Blue Badge spaces and delivery and servicing outside of drop-off/pick-up periods. In theory, the provision of off-street drop-off/pick-up facilities should ease the current traffic congestion in Beaconsfield Road, but TfL is concerned that the forecasted increase in vehicle trips will increase on-street drop-off/pick-up and thus exacerbate the current situation.

The arrangements for managing, monitoring and enforcing the car park should be detailed in Car Park Management Plan (CPMP), secured by legal agreement.

TfL is pleased that the applicant accepts a planning condition that secures a CPMP. Should the Council be minded to grant planning consent, we expect the condition to be secured.

We welcome the provision of 10% active and 10% passive EVCP.

[TfL's Comments] The proposed EVCP provision is acceptable. We require this to be secured by legal agreement and expect that the detailed and management of EVCPs would be contained in the CPMP.

Cycle Parking

60 sheltered cycle parking spaces and 12 Sheffield stands are included. Visitor cycle parking spaces accords with the Intend to Publish London Plan Policy T5. However, a total of 112 long-stay cycle parking spaces are required (Table 10.2 recommends 1 space per 8 FTE staff and 1 space per 8 students). The applicant must therefore clarify how the cycle parking spaces will be accommodated.

We are pleased that the applicant will increase the level of long-stay cycle parking spaces to policy-compliant levels. We will await a revised plan demonstrating how these spaces will be accommodated. Alternatively, a planning condition that requires approval of details of cycle parking prior to implementation would be accepted.

Impacts

The trip generation analysis calculates an uplift of 352 and 282 two-way vehicle trips in the AM and PM peaks, respectively. The uplift in vehicle trips is more than double the baseline and the Transport Assessment (at Table 7.5) finds that development traffic will account for a 24% and 22% increase in traffic in Springfield Road. However, a junction capacity assessment has not been undertaken and as such the conclusion that the development will have no significant network impacts is premature. As a minimum, an assessment of Springfield Road/Uxbridge Road junction should be undertaken. Furthermore, the application site is part of a wider site that accommodates a secondary school with a pupil population of circa 1,243, the majority of whom travel by car. A large proportion of trips are likely to be shared by the primary and secondary school, and as such a combined assessment should be undertaken. TfL will await an updated assessment to further comment on the transport impacts of the proposal.

We are pleased that the applicant is progressing the junction capacity assessment and will submit this assessment in updated TA. We await this updated TA.

Given that the site records a PTAL 0 and has very poor access to public transport, TfL expects that improvements to public transport services should form part of the mitigation package for this development, if a significant shift away from cars is to be achieved. It is noted that the applicant will investigate the feasibility of a school bus. However, given that this is being considered as a measure to reduce car trips, the details must be presented for inspection by TfL and the Council prior to any planning consent; and this will need to be secured through legal agreement.

We will await the outcome of discussion with the school regarding the feasibility of deploying a school bus. In TfL's opinion, operating a school bus would be quite effective in reducing vehicle trips by parents dropping off and picking up pupils. Examples of primary schools in London operating a school bus service in London includes: Faraday Prep School, which can be found on the following link <https://www.faradayschool.co.uk/School-Bus/index.asp>. Additionally, the applicant could consider operating a before and after school club, which could spread demand and thus mitigate the impacts arising from parents dropping off and picking up pupils.

Delivery and Servicing and Construction Logistics Plan

A Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) will need to be secured by legal agreement.

The CLP (Section 6 of the submitted CEMP) contains useful information such as the construction site setup, the proposed logistics route, construction trip generation etc. However, whilst we have not identified any issues, CLPs are treated as an outline/framework document at the planning stage as the contractor would not have been appointed at this stage and thus the construction programme and arrangements are yet to be fixed. The DSP will need to be secured by legal agreement.

Travel Plan

The mode share targets for car and car share indicate that cars will remain the dominant mode of travel to the site. A greater reduction in the mode share for cars should therefore be pursued to minimise the traffic and safety impacts of the development. The Travel Plan should therefore be revised to include more stringent measures to reduce car travel. Should the proposal be granted planning consent, we will expect the school to apply for STARS accreditation as stated. The final Travel Plan should be secured by legal agreement.

This was not a point of objection but considering the issues that arises from additional vehicle trips to the site - potentially increased road safety issues and air quality impacts - we expected the travel plan to be more ambitious in terms of measures to reduce car travel. The deployment of a school bus/school buses could be a major contributor, potentially the principle travel plan measure, and could be very effective in reducing travel by car. It is welcomed that the school will apply for STARS accreditation.

Community Infrastructure Levy

The development will be liable to Mayoral Community Infrastructure Levy 2 (MCIL2) which came into force on 1st April 2019, as well as borough CIL. The rate for the London Borough of Hillingdon is £60 per square metre of floorspace. The applicant should ensure they are fully aware of the regulations.

Summary

TfL raises significant concerns over the safety of pupils using this site, as well as the increased congestion and air pollution caused by this car centric proposal. Extensive further work is required on several areas including assessment, mode share, Vision Zero, Healthy Streets, cycle parking.

I trust that the enclosed response provides you with an understanding TfL's current position on this application. Please do not hesitate to contact me should you have any queries.

REVISED TFL COMMENTS:

Cycle Parking - the applicant has stated that the cycle parking provision will be increased to 112 long-stay spaces to comply with the Intend to Publish London Plan. It is noted that the cycle parking

5% provision for wider bicycles. 12 short-stay spaces located adjacent to the visitor entrance. Figure 2.1 in the TA Addendum shows the location of cycle parking but this plan is not sufficiently detailed to confirm the provision of the quantum stated; and the quality of cycle parking. However, the details of cycle parking can be secured by condition. Noted.

TfL had no real concerns about the suitability of the vehicle access points for coaches or large servicing and delivery type vehicles that would access the site. Nevertheless, the swept path analysis of coaches demonstrates that access and egress suitably accommodates the typical servicing/delivery vehicles that will access the site. The detailed arrangements for deliveries and servicing can be secured through a Delivery and Servicing Plan (DSP). Noted.

The option to use TEMPRO - which is generally not supported by TfL - to estimate background traffic growth. TEMPRO assumes a higher background traffic growth than TfL's strategic models. So the outcome of an assessment using either approach could be very different. The use of TEMPRO, although discouraged by TfL can sometimes be viewed as the worst case in terms of background traffic growth and the traffic impacts of the development. The TA applies the following peak periods: AM (0730 - 0830) and PM (1445 - 1545) whereas TfL recognises AM and PM peaks (or the peak hour within the AM and PM peaks) as AM (0800 - 0900) and PM (1700 - 1800). We need to understand why the applicant has used these peak hours rather than the TfL peak periods. These questions do not necessarily mean that the junction assessment is unreliable. In any scenario, the overall conclusion is unlikely to change i.e. that the junction, which is already congested, will be worsened with the development traffic. Our real concern is that a junction that is shown to be experiencing congestion currently and will worsen in the future without the development, and even further with the development traffic, raises questions regarding the suitability of the junction for pedestrians and cyclists. Surely, the assessment highlights that the current and future congestion issues and affiliated problems at this junction needs to be addressed. It is not a helpful argument to say that this junction is awful and will continue to be awful and the development will worsen this situation but nothing needs to be done about it. Therefore, all mitigation measures including those as suggested in our stage 1 report must be explored and conditioned.

SPORT ENGLAND

It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework (particularly Para 97) and Sport England's Playing Fields Policy, which is presented within its 'Playing Fields Policy and Guidance Document': https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all/part of a playing field, unless one or more of the five exceptions stated in its policy apply.

The Proposal and Impact on Playing Field

The application proposes a three-storey primary school and associated facilities that would result in a substantial loss of playing field at the site. The proposal, however, does intend to provide some sports facilities.

Assessment against Sport England Policy/NPPF

The application proposes a significant loss of playing field which the submitted agronomy assessment does indicate has some negatives but these negatives relate more to the management and maintenance regimes of the playing field rather than matters that are core to the usability of the site, such as ground conditions and drainage issues which may be difficult to address. Although the proposed school building, a non-sports facility, would be responsible for some of this loss, the proposal also does propose an Artificial Grass Pitch (AGP) and what is claimed to be a Multi-Use Games Areas (MUGAs) on the playing field. Sport England questions whether the proposed MUGA's would actually be MUGA's as the drawings suggests these would merely be playground with some court markings which is a considerably lower standard than a MUGA. More details on MUGA's can be found in Sport England's design and cost guidance at <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance>

In relation to the proposed AGP, its actual size and specification is unclear from the documentation seen by Sport England but it is stated to be appropriate for U11 football in the submitted documentation. The immediate area, however, appears well served for football AGP's therefore Sport England has doubts whether the proposed AGP is needed in this particular location to meet local community needs. Furthermore, the Design and Access Statement confirms that community users have not been identified as yet which further highlights doubts whether the proposed AGP is needed in this location. Sport England is concerned that the proposed AGP would not meet community need, be unsustainable as it would not have sufficient community use or attract community use from the other local sites thereby rendering those sites unsustainable. It is important that all sites have a community use to enable the ongoing maintenance and management costs of ensuring that an AGP is fit for purpose, including creating a sink fund and replacing the carpet at the end of its natural life. If a facility is not needed is more beneficial to keep playing field land which is more flexible to accommodate a range of sports compared to fix built structures.

Sport England do, however, acknowledge that the facilities would be available to the community but the extent of community use would appear to be limited as the proposed outdoor facilities would not appear to have sports lighting therefore any community use would be limited to the weekend and early evening during the summer, thereby not being available during the entire weekday peak period for community sport (6:30/7pm to 10pm) throughout the whole year.

In light of the above, Sport England does not consider that the benefits of the scheme stated in the submitted documentation is sufficient to outweigh the harm caused by the partial loss of playing field in an area where there is no clearly strategically identified surplus of playing field. As a result, Sport England does not consider that the application meets any of its Playing Field Policy Exceptions nor the NPPF, paragraph 97. Sport England, therefore, advises that the scheme is reconsidered to significantly reduce the playing field loss or consider an offsite replacement sports facility.

Conclusion

In light of the above, Sport England objects to the application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 97 of the NPPF.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's objection then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State, via the National Planning Casework Unit.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

SPORT ENGLAND ADDITIONAL COMMENT:

Although amending the scheme so that the proposed playground area with sport markings are changed into Multi-Use Games Areas (MUGA'S) could be explored (i.e so there will be 2/3 courts that have appropriate fencing and a porous macadam surface to reflect Sport England guidance) Sport England would expect these to have sport lighting for these to be considered an overall benefit to mitigate the harm caused by the loss of playing field the MUGA's would cause, namely reducing the size of the playing field which is far more flexible to provide for a range of sport than fixed structures such as MUGAs. In this respect Sport England does note that other local facilities such as the Artificial Grass Pitch (AGP) and stadium pitch at Hayes & Yeading FC and the Goals facility, appear to have sports lighting but if there are ecological considerations that prevent sports lighting then alternatives would have to be considered to mitigate the loss to overcome this aspect of Sport England's objection.

In relation to AGP need, there are football facilities close to the application site that have community use. These offer a range of pitch sizes, with the AGP at Hayes & Yeading being full size therefore able to accommodate all football pitch sizes. Sport England have also liaised with the Football Foundation and Middlesex FA who have indicated that football provision within this area is sufficient. This, therefore, raises questions for need and whether the facility is sustainable, not only terms of ensuring it can have generate the appropriate funds for the considerable management and maintenance costs but also the effect it could have on other facilities in the area. As a result, Sport England are unable to concluded that there is sufficient benefit of a small AGP in this area to mitigate the loss of playing field which could be used for a number of sports beyond football.

Finally, thank you for amending the Community Use Agreement, it appears that most points previously raised have been considered although the elements relating to the management (which should include the Council), membership of the review committee and that the income should be re-invested into the sports facilities at the site should be addressed. Once these are addressed and the CUA is signed by the parties then Sport England would be content that this would adequately secure community use of the site.

Overall, if the scheme can include MUGA's that align with Sport England guidance then that element could be considered meet Exception 5 of our policy however the school building and AGP (the need of which is questionable) still result in playing field loss which is unmitigated. As a result, Sport England would be unable to change its position on this scheme.

GLAAS

Although not within an Archaeological Priority Area, the Guru Nanak School site was the subject of an archaeological assessment carried out in 2009 and has useful geotechnical information supplied as part of this application. The school lies on alongside the floodplain of the Yeading, Brook, which is known to be a prolific source of prehistoric finds, indicating that the valley was a favoured location for prehistoric settlement. Very few findspots of any period are recorded in the vicinity of the site, and the details for some of these are sketchy, as they derive from 19th-century finds, but they are potentially significant. During construction of the gasworks site to the south-east, Palaeolithic implements were found, apparently in association with mammoth bones.

Most Palaeolithic artefacts derive from secondary deposits, that is, they are not found where they were originally lost, but any that occur in association with animal bones can be regarded as of especial significance, since in situ evidence of human interaction with the environment at this period is so rare. The archaeologically relevant levels can be considered to be the brickearth and its interface with the very top of the gravel, for the Palaeolithic period, and above this for all later periods.

However, the geotechnical observations suggest that the brickearth has been wholly removed

within the area of the proposed built development indicating low negligible potential for significant discoveries. London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

No further assessment or conditions are therefore necessary. This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Internal Consultees

EDUCATION

Nanaksar school is part of the Guru Nanak Multi Academy Trust and is located on the same site as the Guru Nanak Sikh Academy, an all-through school with 60 pupils in each primary year group feeding into the secondary phase which has 180 pupils in each year. Nanaksar Primary school opened in September 2013 with 120 places in temporary accommodation. After two years it ceased intakes, pending a new permanent building, and subsequently DfE agreed to provide this as a new Free School building.

The January 2020 school census return reports 216 pupils on Nanaksar roll; 99 now in Year 5 and 117 in Year 6. In September 2020 the school plans to reopen Reception for a reduced intake of 60 pupils, in temporary accommodation until the building is complete when the full 120 intake will restart. Therefore the new building will house almost a new school.

The need for these extra places is evidenced by the council's education planning projections. The school is in Hayes, an area of growing demand for more primary places, and with substantial new housing developments. Also, the school is likely to recruit some pupils from a wider area of the borough and beyond, as it has done previously along with Guru Nanak school, due to their admissions criteria giving some priority to those of the Sikh faith and location by the boundary with Ealing. Both schools are very popular with parents and have consistently high levels of pupil achievement and active local social and community engagement. Pupils from Nanaksar are a priority in the admission criteria to the secondary phase of Guru Nanak Sikh Academy. Ofsted has inspected and graded both schools 'Good' with some 'Outstanding' aspects at Nanaksar

POLICY

Please see the following as comments relating to planning application 4450/APP/2020/515 on behalf of the Planning Policy Team.

Construction of a new three-storey 4FE primary school (to replace the existing Nanaksar Primary School) with associated hard and soft landscaping, outdoor sports provision, car parking and new access arrangement

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 - Development Management Policies (2020)

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

The London Plan - Consolidated With Alterations (2016)
The West London Waste Plan (2015)

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 (Intend to Publish Version December 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. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October 2019.

The Mayor considered the Inspectors' recommendations and, on 9th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for the Inspectors' recommendations that the Mayor did not wish to accept. The Secretary of State responded on the 13th March 2020 and stated that he was exercising his powers under section 337 of the Greater London Authority Act 1999 to direct that modifications are required. These are set out at Annex 1 of the response, however the letter does also state that if the Mayor can suggest alternative changes to policies that would address the concerns raised, these would also be considered.

More limited weight should be attached to parts of draft London Plan policies where the Secretary of State has directed modifications or where they relate to concerns raised within the letter. Greater weight may be attached to policies that are not subject to modifications from the Secretary of State or that do not relate to issues raised in the letter.

Green Belt

In accordance with London Plan (2016) Policy 7.16 and Local Plan: Part 1 (2012) Policy EM2, proposals for development in the Green Belt will be assessed against national policy and guidance. It is not considered that the scheme would meet any of the exceptions test outlined within Paragraph 145 of the NPPF (2019) and therefore it would constitute inappropriate development in the Green Belt. The scheme should therefore only be approved in very special circumstances which outweigh the harm to the Green Belt by reason of the inappropriateness and any other harm resulting from the proposal.

Paragraph 133 of the NPPF (2019) outlines that the fundamental aim of Green Belt policy is to

prevent urban sprawl by keeping land permanently open and states that the essential characteristics of Green Belts are their openness and their permanence. In order to consider the harm to the Green Belt, it is important to outline the existing built form of the site. The site currently comprises the existing temporary accommodation with its ancillary space (outdoor space, drop-off area, car parking etc.) which is focused and contained in the most northern part of the site, along Beaconsfield Road. The existing accommodation is relatively small in scale compared to the proposed development, as it is single storey (3.7m) and has a floorspace of just 380m². Importantly, the existing development has been permitted on a temporary basis until 30th September 2020 and therefore its impact on the Green Belt is also only temporary.

It is clear that, in order to achieve the applicant's aim of accommodating more pupils than the existing temporary school, the proposal would result in harm to the Green Belt. The height of the school would increase to three storeys (12.3m) and the floorspace would increase to 3795m². The school buildings have also had to move further south, away from Beaconsfield Road and slightly further into the Green Belt, in order to accommodate the introduction of more hard standing for ancillary space at the front of the site (drop-off area, car parking etc.). To the south of the new school building, there would also be in the introduction of more hard standing in the Green Belt, which would include a 4g pitch with its own fencing. In terms of mass and sprawl, the proposal would therefore undoubtedly have a moderate adverse impact on the Green Belt.

It is also important to consider the visual dimension of openness and whether any views would be affected by the proposal. In terms of the existing context of the site, it is located between the significantly larger Guru Nanak School to the west, strategic industrial land to the north, a football stand to the east and formalised 3g/4g playing pitches to the south east and south west. The applicant has prepared a Visual Impact Assessment, which has established seven key views from which the proposal is likely to be visible. The assessment concludes that there is a minor adverse impact from views 1, 2 and 6. This is defined as where the proposed scheme would cause a slight deterioration in the existing view. I would note that the assessment for View 5 does not appear to be correct, as the viewpoint established on the map and photo that has been taken are not at the same place. The photo appears to have been taken from a location substantially further south and the view is therefore obscured by the FM Conway - Heathrow Asphalt & Recycling Plant. The more logical view would be one further north, as if you were walking or cycling along the A312, from which you can see the existing Guru Nanak Sikh Academy. I would conclude that, subject to clarification on View 5, there is only likely to be a minor adverse visual impact in addition to the previously outlined spatial impact on the Green Belt.

(OFFICER COMMENT- View 5 was amended by the applicants)

In terms of the very special circumstances that have been put forward by the applicant, it is considered that the primary justification is the need for new primary school places to address projected unmet need. The Development Infrastructure Funding Study (DIFS) (2017) concluded that demand for primary places in the south of the borough is still forecast to grow, particularly in the Hayes area due to the scale of new housing development. Nine new forms of entry were expected to be needed in the south of the Borough by 2023/24, with 6 of these being needed in the Hayes area. It is worth noting however that these projections were taken from consultation with the School Place Planning Team and it is important that any more recent updates to these projections are taken into account. The Quarterly School Place Planning Update (Feb 2020) provides an updated picture of the need for new primary school places. In relation to PPA 11, where the proposed primary school would be, it is clear that the reopening of Nanaksar Primary is already expected and is being planned to ensure sufficient primary school places in PPA 11 and a wider area. It should also be noted that the school was identified by the Council's School Place Planning Project Manager as being necessary at the pre-application stage, with the planned reopening of the reception classes on temporary buildings in 2020 already receiving applications for almost all its capacity. It would therefore appear that there is an evidenced need for a new primary school of this magnitude in this

part of the Borough. This should be confirmed by the School Place Planning Project Manager prior to making your final recommendation.

The applicant has undertaken a sequential test to demonstrate that there are no sequentially preferable sites available to accommodate this need which would be in greater conformity with the Development Plan. The sequential test has been undertaken on a number of agreed assumptions between the local planning authority and the applicant. The catchment area is a 3 mile radius from the site. This covers PPA 11, as well as the majority if not all of the area contained within neighbouring PPAs and is therefore considered appropriate. The test has also been undertaken on the need for a site of at least 0.65 ha, which is below the typical minimum size of 0.8ha that is usually used by the EFA in London Boroughs and therefore the applicant has demonstrated flexibility in terms of format. In terms of availability, the sequential test has discounted sites that would not be available in the near future. This is considered to be pragmatic noting that the need for new primary school places is already growing and time will be required after the planning process to construct the school. Whilst I do not agree with all of the justifications for discounting some sites, I would still agree with them being discounted on other grounds and therefore I agree with the overall conclusion that there are no sequentially preferable sites.

Noting that the applicant has demonstrated a need for this proposal to be developed on this site, it is necessary to look at how the proposal has been designed to minimise the harm to the Green Belt. It is considered that the majority of the built form has been concentrated to the north of the site, in order to limit the sprawl into the Green Belt. The parts of the scheme that are more sympathetic to maintaining the openness of the Green Belt, notably the grass playing pitch, have been appropriately located to the south of the scheme. Whilst the volume of development has increased above the baseline scenario, noting that this scale of development has been demonstrated to be needed, it is considered that a taller building with a smaller footprint is preferential to trying to accommodate this floorspace over one storey. The latter would inevitably have led to a scheme that sprawls further into the Green Belt. I would note that there appears to be a 'grass mound' identified on the southernmost part of the site with the aim of 'offering a visual buffer', which does not appear to be in keeping with the aim of Green Belt policy. This should be amended or justified.

(OFFICER COMMENT: The 'mound referred to has been removed and replaced with an ecological garden to serve the pupils of the school)

In terms of other very special circumstances, the proposed co-location within an existing community of schools and the ability to share facilities has also been put forward as a benefit of the scheme. It should be noted however that, considering the importance that government attaches to Green Belt in Paragraph 133 of the NPPF (2019), when taken in isolation this should not amount to the very special circumstances required to outweigh the harm of this development. However it should be considered as part of the cumulative set of very special circumstances.

Furthermore, comments should be sought on the provision of sports facilities directly from Sport England. If the re-provision of sports and recreation facilities did not lead to an overall enhancement, this should not amount to very special circumstances as the re-provision alone would be expected under Policy 3.19 of the London Plan (2016). If this re-provision leads to an enhancement above the existing baseline scenario, then this should be considered as part of the cumulative set of very special circumstances.

HIGHWAYS

Planning permission is sought to redevelop the Nanaksar Primary School thereby allowing it to increase the school roll from two forms of entry (2FE), or 420 pupils to four forms of entry or 840 pupils. The developer however reports that only 240 pupils currently attend the school. With the new development the net uplift in pupil numbers would be 600. The number teachers at the school

would increase from 20 to 55.

The application site is accessed from Beaconsfield Road, a two-way single carriageway road which forms the southern boundary of the Springfield Road Industrial Estate. Beaconsfield Road intersects with Springfield Road at a mini-roundabout adjacent to the north-west corner of the site. Springfield Road functions as a spine road for the Springfield Road Industrial Estate, connecting Beaconsfield Road in the south, to Uxbridge Road (A4020) in the north.

Springfield Road is an adopted public highway leading off the busy A4020 Uxbridge Road, it benefits from a 30 mph speed limit, street lighting and footways on both sides of the road. Along the southbound carriageway that borders the site, there is a mix of single yellow lines operational Monday to Friday 07:00 to 09:00 and 14:30 to 16:30 hours, double yellow lines and no parking restrictions at all. On the opposite side of the road there are double yellow lines only.

Springfield Road provides access to a range of uses including a hotel, a small retail park, wholesale retailers, small medium enterprises as well as Minet Country Park open space, the Guru Nanak Sikh Academy, Goals 5-a-side football pitches and Hayes and Yeading Football Club. The road is characterised by heavy good vehicles making deliveries/parking on-street, cars parked on-street and school traffic generated by the Sikh Academy.

Uxbridge Road (A4020) is a dual carriageway which connects to Shepherds Bush in the east and Uxbridge in the west. Uxbridge Road (A4020) intersects with The Parkway (A312) approximately 300m west of the Springfield Road junction at a large signalised roundabout known locally as the Ossie Garvin Roundabout.

The site is located opposite Springfield Road Industrial Estate. There are three pedestrian routes into the site area; one via Springfield Road and two via Minet Country Park. One access through Minet Country Park is via a underpass from a shared pedestrian/cycle route at Abbotswood Way to the west of the site. The other Minet Country Park route connects to the Ossie Garvin Roundabout and the segregated pedestrian and cycleway routes provided across the roundabout.

Transport for London use as system called PTAL (Public Transport Accessibility Level) to measure access the public transport network. PTAL assesses walk times to the nearest public transport location taking into account service frequency. The location is then scored between 0 and 6b where 0 is the worst and 6b the best. According to the Transport for London WebCAT service the application site has a PTAL ranking of 0 indicating access to public transport is poor compared to London as a whole. This suggests that trips to the application site will be made by private car.

The development site is a 30-minute walk (1.6 miles) from both the Southall and the Hayes and Harlington train stations and a 10-minute walk (0.5 miles) to the Uxbridge Road (A4020) bus stop.

The Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT 6: Vehicle Parking requires that development proposals must comply with the relevant parking standards. For a development of this type the maximum number of parking spaces permitted is to be determined on 'an individual basis using a transport assessment and where applicable school travel plan/travel plan'. The Local Plan mentions that where relevant, provision should be made for coach/bus access and parking.

The new Primary School would have 27 staff car parking spaces, three of which would be blue badge/wheelchair accessible.

The site will provide a drop-off area for 23 vehicles. This consists of a parallel area at the southern edge of the access road and with perpendicular spaces adjacent to the staff car parking spaces. Outside of the drop off/pick-up periods, three accessible car parking spaces will be available for

visitors. The staff car park has been designed so it is separate from the drop-off/pick-up area so as not to interfere with the flow of drivers arriving to drop-off/pick up pupils.

To be in accordance with Policy DMT 6: Parking it is necessary that the development makes provision for coach parking. From the drawings provided it is not clear how coaches taking pupils on school trips etc would park to pick up and set down passengers. This matter needs to be clarified or if not included the plans must be revised.

The cycle store will be located in the north-east corner of the site. This will provide 60 sheltered and secure cycle parking spaces. In addition, 12 Sheffield stands will be provided adjacent to the visitor entrance. The bin store is located at the north-eastern corner of the site, adjacent to the cycle store. This enables refuse vehicles to use the one-way vehicle access/egress system and stop adjacent to the bin store for collection. The refuse collections will be scheduled to occur outside of the drop-off/pick-up periods.

In support of the planning application the developer has provided a Transport Assessment. This discusses the number of trips the development would generate and the impact these would have on the surrounding transport network. As to be expected with a school, the AM peak is when the greatest number of trips are generated. The school currently has 240 on its roll, a travel survey undertaken in 2019 established that 41% arrive by car, the developer then reports that as 35% of pupils car share, this equates to 64 cars arrive each morning to drop students off and then leave. Of the 20 teachers working at the school, the same travel survey found that 93% commute by car. Adding the number of car trips generated by pupils and teachers together, the developer reports that the development currently generates 83 car trips in AM peak. The new development would have 840 pupils, assuming the mode share remains the same and 35% of pupils car share then the new school would generate 224 pupil and 51 teacher car trips in the AM peak, 275 in total, an increase of 192 car trips. However, not all of these pupils arrive at the same time, over a third of pupils, 38% attend a breakfast club and are already at the school before most children arrive. Taking this into account it is forecast that 140 cars would arrive just before the school day begins.

This increase in car trips is not insignificant, the developer in their Transport Assessment goes on to explain how these additional car trips would be accommodated. The new school would have a drop off area with 23 car parking spaces. The school would spread the demand for these car parking spaces by staggering the arrival time over a 30 minute period. Reception to Year 2 would arrive in the first 15 minutes followed by Years 3 to 6 in the last 15 minutes. Based on it taking just over 3 minutes to arrive and park, let the pupil out of the car and leave over the course of 30 minutes the 23 car parking spaces could accommodate up to 197 cars arriving. As it is estimated that 140 cars would arrive just before the school day begins, the developer points out that the drop off zone has an ample supply of car parking spaces.

As mentioned above, 51 teachers would drive to work and need somewhere to park upon their arrival, however the staff car park would only have 27 car parking spaces. As such the remaining 24 teachers would have to park on-street. The developer has carried out parking beat surveys to determine the quantum of on-street car parking freely available. The results of this survey showed that of the 188 on-street parking spaces available, at the busiest time 68 or 58% were occupied leaving 50 vacant, even if the teachers were to take 24 of these, there would still be 26 spaces for others to use.

Using the results of the trip generation analysis, the developer has gone on to assess the vehicular impact the development will have on the Springfield Road/Uxbridge Road/Brookside Road junction. The developer has taken the results of the 2019 traffic surveys and using the industry standard future traffic forecasting tool TEMPro to determine growth rates for the future year of assessment 2027. To these figures the developer has added the net uplift in vehicular trips generated by the new development. Traffic has been assigned to each arm of the junction as is currently the case. The

results of this work shows that Springfield Road will experience an increase in traffic flows of around 23%. The developer contends that there will be a 12% increase in traffic flows along Uxbridge Road attributable to the development, this is described as being 'modest' taking into account that traffic flows can vary by as much as 10% day to day.

Whilst the car is the means by which the majority of pupils currently travel to school a reasonable proportion, 24% walk to school in the morning. This is equivalent to over 200 pupils walking to the new school if it is built. Again based on the 2019 journey to school traffic survey around 25 pupils are expected to cycle to school.

The developer has demonstrated in the Transport Assessment that despite the growth in pupil numbers that the new school would not give rise to parking stress, this is on the basis that 35% of pupils arriving by car are car sharing, 38% of pupils attend breakfast club with the remainder of arrival being spread equally over a 30 minute period. A further assumption is that it will take just over 3 minutes to stop, let the pupil out of the car and pull away again. The Highway Authority accepts the reasoning behind the trip generation workings presented but seeks firm assurances that the management arrangements proposed will work in practice, not least the proposal that the school day is staggered.

A Travel Plan has been submitted alongside the planning application, this has been assessed and the targets for the mode share for pupils are considered satisfactory, the mode share targets for teachers however could be more stretching. The Transport Assessment refers to a 'drop-off/pick-up' warden being deployed by the school to ensure vehicles do not dwell on-site longer than necessary and traffic keeps moving along. It also mentions that children will be escorted for their cars to the school entrance by teachers/staff to 'speed up the process'. Both of these measures are key to the efficient management of traffic. As surety that the Travel Plan will be delivered and the targets attained, the Highway Authority requires the developer to pay to the Council a £20,000 bond, in the event of the targets not being met, the Highway Authority will use this money and deliver the Travel Plan itself.

The Highway Authority requires that applicant prepares and submits a Construction Logistics Plan and Service and Delivery Plan. These should be produced based on the guidance produced by TfL tailored to the development and local circumstances. This guidance is available at:-

Construction Logistic Plans:-

<http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf>

Service and Delivery Plans:-

<http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>

The Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT 2: Highway Impacts requires that development proposals must ensure that they do not contribute to the deterioration of air quality, noise, local amenity or safety of all road users and residents. Without carefull and diligent ongoing managment the proposed new school will generate volumes of vehicular traffic that may increase the risk to road safety, hinder the free flow of traffic and lead to parking stress. The delivery of the School Travel Plan is key to making the development acceptable in highway terms.

The Highway Authority considers that the Travel Plan should be complemented with investment in a shared use footway along the full length of Springfield Road on its western side. Sections of this shared use footway have already been built. The shared use footway would include features that allow cyclists and pedestrians to cross the many access points along the route without risk to their personal safety. As part of this work the developer is also required to fund a review of parking restrictions along Springfield Road and the implementation of any changes required. This shared

use footway would cater for the forecast 200 pupils that will walk to school and the 25 that will cycle as well as encouraging and enabling more pupils to do so in turn reducing the amount of children being driven to school. This shared use footway should be characterised by the 10 Healthy Street indicators such as street trees, benches and street lighting

The Highway Authority supports the emerging Hillingdon Santander Bike Hire Scheme. The Nanaksar Primary School provides an opportunity for expanding this scheme. It is envisaged that a docking station could be provided both at the Uxbridge Road end of Springfield Road and also adjacent to the school itself. School children and all others with business along Springfield Road could use these bicycle to travel in between the Uxbridge Road, the new school as well as the many other destinations en-route using the newly build shared use footway. By providing a cycle route separated from road traffic the risk to cyclists would be reduced, this measure would contribute towards the Mayor of London Vision Zero, whereby there are zero fatal and serious road safety casualties in London by 2041.

There are no highway objections to this development subject to the receipt and delivery of a car parking management plan setting out the staggered school arrival times, the role of the traffic warden, details regarding where coaches would park and the provision of a shared use footway along the full length of Springfield Road.

HIGHWAYS COMMENTS FOLLOWING TA ADDENDUM 06-04-20

The expanded school will be in new purpose-built facilities and the existing school's temporary buildings will be removed. A Transport Assessment has been provided in support of this application, highway comments on this Transport Assessment have been provided to the applicant by LB Hillingdon as well as Transport for London and the Greater London Assembly. In response to these comments the applicant has provided a Transport Assessment Addendum.

The Transport Assessment Addendum describes how the development will be changed to include 112 long-stay cycle parking spaces of which 5% will be suitable for use by larger bicycles. The 12 short-stay cycle parking spaces originally included will still be provided. In response to comments made by LB Hillingdon, the Transport Assessment Addendum provides further details regarding coach access and passenger drop-off/pick-up arrangements. A swept path drawing has been provided showing how a coach would enter and leave the drop-off/pick-up area in front of the school.

The geometry of the drop-off/pick-up area is able to cater for a coach but the Highway Authority is concerned that there could be a risk to road safety if a coach were to arrive at the same time as the drop-off/pick-up area was being used by car drivers. The Highway Authority requires assurances that such instances will not occur and if they do how will they be managed, for example where would the coach wait until the area becomes free?

As requested by the Greater London Assembly, the applicant has carried out an assessment of the Uxbridge Road/Springfield Road junction to determine whether it has the capacity to cater for any uplift in car trips generated by the school expansion as well as background traffic growth. From the information provided it is unclear whether committed developments along Springfield Road have been taken into account, if the junction modelling is to produce accurate results committed development must be included as they will also place extra trips on the network. Notwithstanding this issue, the applicant reports that the junction is shown to experience capacity issues in the future assessment year 2027 regardless of whether the school is expanded or not. The Transport Addendum suggests that capacity issues at this junction may even deter parents/guardians from driving to school supporting a mode shift in favour of active and sustainable travel.

Since submitting the first set of comments, the Highway Authority has been made aware that the GLA require that a school bus is provided to be secured by a legal agreement; this is something the Highway Authority supports. The school may wish to consider whether a demand responsive

school bus could be provided. Such a bus would operate along a specific 'corridor' and pupils would book a ride using an app. Similar to LB Hillingdon the GLA also require that on-street parking around the school is reviewed with a view to minimising the risk to road safety arising from pupils crossing the road hidden in between parked cars.

The earlier comments made by the Highway Authority suggested the provision of a Santander bike hire scheme to operate along Springfield Road in between the school and Uxbridge Road. This is an idea that has now been developed further, the Highway Authority require a contribution from the school to support a Santander bike hire scheme to operate between Hayes and Harlington Railway station along Coldharbour Lane, Minet Drive then into Minet County Park and onwards to the school and employment sites along Springfield Road. This would be a facility for members of staff and pupils to use as well as older pupils attending the adjacent Academy. As already mentioned in the earlier comments the School Travel Plan pays little regard to reducing car trips by members of staff.

This must be addressed. The Highway Authority is aware that Transport for London requires changing rooms with showers and lockers are provided for staff that cycle to work to use. Again this is something that the Highway Authority also supports.

The Highway Authority has now developed further the measure it requires the school to support as outlined in the earlier set of comments. These are as follows:-

1. Shared use footpaths linking the subways at Minet Drive and Abbotswood Drive with the school and Springfield Road. Budget estimate £26k
2. Measures to create an active travel zone around the school, including works to reduce road safety risk, encourage active travel and create a 'Healthy Streets' environment. This will include a review of on-street car parking, crossing facilities, footway and carriageway works and street lighting. Budget estimate £89k
3. Installation of a 'School Keep Clear' markings CCTV camera to enforce illegal parking. Budget estimate £15k
4. Provision of a School Bus to be secured by a legal agreement
5. Payment of a £20,000 bond as surety that the School Travel Plan will be delivered to be secured by legal agreement
6. Contribution to a Hayes town centre to Springfield Road Santander cycle hire scheme to be secured by legal agreement £30k
7. Production and implementation of a Car Park Management Plan (CPMP) setting out arrangements for managing, monitoring and enforcing the car park to be secured by legal agreement.
8. A Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) to be secured by legal agreement.

(OFFICER COMMENT: Further dialogue was held with the applicants and a more detailed cost estimates resulted in the final planning obligations as set out within the 'Recommendation'.)

FLOODING

There are no objection to this proposal following the submission of this additional information. It is noted that the area to the south easting corner will not be raised within Flood zone 2 and a revised landscaping plan and FRA will be submitted in due course.

An FRA FS0128-CUR-00-XX-RP-C-0003-V03 and Drainage Strategy FS0128-CUR-00-XX-RP-C-0001-V03 Revised drainage strategy have now been submitted. FS0128-CUR-00-XX-RP-C-0002-V01 Suds operations maintenance manual has now been submitted.

Further information on the green walls has been submitted on p.53 of the Design & Access Statement (revision P11). The GNSA ultimately felt that the operational and maintenance costs of a specialist green wall installation were not practical; and as a result the proposals incorporate a

planted arrangement of pleached trees along the feature wall, establishing an element of 'green wall' visual impact without the associated maintenance requirements.

The scheme does not specifically include measures to collect and reuse rain/grey water. However it does seek to minimise water consumption and thus be more water efficient. The scheme is aiming for BREEAM Excellent in the water category by firstly, installing a BREEAM compliant leak detection system between the utility providers meter at the site boundary and the incoming main meter at point of building entry in order to monitor below ground mains for leaks on site, to ensure a signal is present should any water leakage/wastage occur below ground on site. Both of these meters shall be linked back to BMS system for monitoring via a pulsed output. This both ensures the security of the supply, achieves a BREEAM credit and ensures wastage does not go unnoticed.

Secondly, a cold-water tank is proposed to provide 2-hour storage of 5l/person providing resilience against the mains water supply and ensure security of the supply. This also reduces the strain on the mains cold water infrastructure as refill rates of the tank drastically reduces flow required were the building to be served directly from the mains under mains pressure, putting less water volume requirements directly onto the system. A booster set shall be provided along with the cold-water storage tank to ensure sufficient pressure throughout the building at all outlets. This booster set shall be selected to be highly energy efficient in order to minimise energy usage and shall be variable speed to ensure pumps are only in use when there is water demand on the system.

Thirdly, areas with large water usage that is greater than 10% of the overall building load shall be sub-metered (in this case the catering water usage) with sub meter providing a pulsed output to BMS to monitor water consumption of the kitchen domain. BMS will also monitor general water usage and any metered elements will warn for out of range values where irregular usage is picked up for a member of staff to review at the panel and assess where excessive water usage is occurring. In addition to the above strategy, flow restrictors/low flow outlets are proposed to reduce water consumption of the building by decreasing water flow at outlets. For example, a handwash basin under BS8542 will use 9L/min, whereas proposed handwash basin outlets for Nanaksar Primary school shall provide 2L/min therefore offering a 77% reduction in water consumption from handwash basins with flow restrictors/low flow outlets proposed to all outlets. This will drastically reduce the water consumption of the school itself and reduce the litres per day per person usage significantly in line with intend to publish London Plan Policy S15.

Additional microdrainage calculations have also been submitted to show that the modelling Curtins have advised that the proposed drainage network was modelled for surcharged outfall and that this does not affect the proposed private network.

ACCESS

This proposal has been assessed with reference to the 2016 London Plan and its contained policy 3.1 (Equal Life Chances for All) and 7.2 (Inclusive Design). Whilst the proposal demonstrates some to commitment to the principles of Accessibility and Inclusion, the following issues should be addressed under development control:

1. It is noted that a small hygiene room is shown on plan. However, this should be increased in size to support those with complex personal care requirements. Whilst changing areas in the traditional sense may generally not be provided, the principle of inclusion is about young people with special educational needs being placed in mainstream provision, where there is a commitment to removing all barriers to allow full participation. The room should be sized 12 m² (3m by 4m) and fitted out in accordance with 'Changing Places' specifications. Plans should be amended accordingly.

2. An emergency evacuation plan/fire strategy that is specific to the evacuation of persons unable to escape by stairs should be submitted and reviewed prior to any grant of planning permission. Provisions could include:

- a) a stay-put policy within a large fire compartment(e.g. within a classroom at first floor with suitable fire resisting compartmentalisation);
 - b) provisions to allow the lift to be used during a fire emergency (e.g. uninterrupted power supply attached to the lift);
 - c) contingency plans to permit the manual evacuation of disabled people should other methods fail.
- Conclusion: Unacceptable at present.

The following informatives should be attached to any grant of planning permission.

- a) The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.
- b) Fixtures, fittings and furnishings, particularly hard materials should be selected to ensure that sound is not adversely reflected. The design of all learning areas should be considerate to the needs of people who are hard of hearing or deaf. Reference should be made to BS 8300:2009+A1:2010, Section 9.1.2, and, BS 223 in selecting an appropriate acoustic absorbency for each surface.
- c) Care should be taken to ensure that the internal decoration achieves a Light Reflectance Value (LRV) difference of at least 30 points between floor and walls, ceiling and walls, Including appropriate d cor to ensure that doors and door furniture can be easily located by people with reduced vision.
- d) Induction loops should be specified to comply with BS 7594 and BS EN 60118-4, and a term contract planned for their maintenance.
- e) Care must be taken to ensure that overspill and/or other interference from induction loops in different/adjacent areas does not occur.
- f) Flashing beacons/strobe lights linked to the fire alarm should be carefully selected and installed to ensure they remain within the technical thresholds not to adversely affect people with epilepsy.

FURTHER ACCESS OFFICER COMMENTS 24.04.20

Thanks for following up on my comments Chris.

With regard to the 'Changing Places' cubicle, this, unfortunately, at the moment is only best practice and not a requirement.

With regard to proper and appropriate means of escape for the evacuation of people unable to use the stairs, we should require a Evacuation Plan. The agent should refer to the emerging 2020 London Plan and its contained policy D11 for further information and guidance.

URBAN DESIGN

The proposals had been subject to pre-application advice the design aspects of which have been positively reflected in this formal submission.

The proposed design and layout is considered acceptable and not to significantly affect the openness of the Green Belt due to it being seen against the back drop of pre-existing light industrial and school buildings. The scheme could be improved with greater planting particularly at the front of the school and the areas of blank brickwork having a green wall to help soften the development. Should the application be minded for approval then a number of conditions are recommended to be attached to ensure the design quality of the scheme.

2 Observations

The application seeks planning permission to construct a new three-storey 4FE primary school (to replace the existing Nanaksar Primary School) with associated hard and soft landscaping, outdoor

sports provision, car parking and new access arrangement. Prior to the submission of this application there had been a number of pre-application discussions (see app: 4450/PRC/2019/206).

The application site is located within the Green Belt on the south side of Beaconsfield Road. Land to the north of the site consists of mainly industrial, retail and business uses including West London Film Studios and Hayes Bridge Retail Park. To the east of the site is Hayes and Yeading United Football Club consisting of two playing pitches, a seated stand and associated car parking. To the west of the site are numerous buildings and several playgrounds associated with Guru Nanak All-through School. South of the site is an all-weather sports pitch and the Minet Country Park. The site is currently located within the grounds of the existing Guru Nanak All-through School.

The proposed development will see the replacement of the existing temporary modular class room structures on site for the provision of the new 4 Form of Entry (FE) Primary School - Nanaksar Primary School for 840 pupils.

If planning officers consider that a special circumstance case can be made to develop land within the Green Belt for additional school buildings then any new development should be designed in a way that protects the visual amenity of the Green Belt as much as possible. The proposed location of the building close to Beaconsfield Road is appropriate as it would help to keep development close to already developed areas. The impact on the Green Belt would, therefore, be less as it will be seen in the silhouette of pre-existing buildings particularly from views looking north within the Green Belt towards the Industrial Estate and adjacent school buildings.

The submitted scheme has taken into consideration previous design advice provided during pre-application discussions. The proposed school appears less as a linear block and the bulk and mass of the building has been broken up more with a combination of 1, 2 and 3 storeys and as a consequence has helped to reduce its visual impact. The elevational treatment of the building has now been drawn up in more detail. It is considered that the use of brick as a primary building material will allow the school to sit more quietly within its context and will provide a clearer reference to the already established school buildings. The use of render has now been removed from the proposals and visual interest has been provided, more appropriately through brick detailing in the form of banding and expressed brick courses and the introduction of decorative spandrel panels.

The addition of green roofs appears minimal and restricted to the single storey roof at the southern end of the building. Could the green roof coverage be extended to cover more of the roofs? The larger expanses of plain brickwork to the elevations of the school would also benefit from the inclusion of green walls to help soften the development.

It is noted that there is to be additional fencing provided around the school grounds (details of which are not shown within the submission). This would need to be discreet and if possible involve the provision of hedging to provide a softer appearance and sit more comfortably within the Green Belt. The existing front boundary comprises open black railings and hedging/trees which provide a soft and verdant edge to the site. These currently make a positive contribution and clarification should be sought on whether these are to be retained or replaced. If they are to be replaced then details should be provided.

Opportunities should also be taken to provide additional planting to the front of the school to prevent large areas of unbroken hard standing and provide further softening to the site.

3. Conclusion

The proposed design and layout is considered acceptable and not to significantly affect the openness of the Green Belt due to it being seen against the back drop of pre-existing light industrial and school buildings.

The scheme could be improved with greater planting particularly at the front of the building and the larger expanses of plain brickwork to the elevations of the school would benefit from the inclusion of

green walls to help soften the development.

Should the application be minded for approval then it is suggested that the following conditions be attached:

Submission of Details

Detailed drawings or samples of materials as appropriate, in respect of the following shall be submitted to and approved in writing by the local planning authority before the relevant part of the works is begun, and the works shall not be carried out other than in accordance with the details so approved and shall thereafter be so maintained:

- (a) Samples of materials
- (b) Details of parapets, cills, reveals, spandrel panels, safety railings
- (c) Detailed design of front and rear canopies
- (d) Details of railings and fencing
- (e) Details of substation

Sample panels of facing brickwork

Sample panels of facing brickwork showing the proposed colour, texture, facebond and pointing shall be provided on site, and approved in writing by the local planning authority before the relevant parts of the approved works are commenced, and the sample panels shall be retained on site until the work is completed in accordance with the panel (s) so approved.

Elevational drawings at a scale of 1:20 and plan and vertical sectional drawings at a scale of 1:2 of the proposed windows and doors shall be submitted to and approved in writing by the local planning authority. The works shall be undertaken in accordance with the approved details.

SUSTAINABILITY OFFICER:

I have no objections to the proposed development. There is a need for a detailed energy condition. I am also concerned about the current status of the school and what appears to be a vacuum of any outdoor educational space dedicated to wildlife learning. Outside the site's boundary is Minet Country park which encompasses two rivers and some high quality ecological habitat. The school site by contrast appears to be free of any ecological value with limited if any outdoor educational space dedicated to biodiversity learning. It is noted that there is an intention for a 'grass mound' to prevent pupils using the southern corner of the site. Whilst this might be of practical purposes for managing pupil behaviour it is a wasted opportunity; a more carefully thought through planting plan could contribute to wildlife improvements as well discouraging the loafing of pupils (for example through thorny berry producing planting) - a condition which addresses this concern is essential.

Energy

The energy strategy is acceptable and has been updated to include a response to SAP10 requirement of the GLA Intend to Publish London Plan. The strategy centres around the use of PVs of which further details are required the following condition is necessary:

Condition

Prior to above ground works, full specifications of the amount, type and location of the roof mounted PV array shall be submitted to and approved in writing by the Local Planning Authority. The specifications shall detail the PVs to be used and correspond with the savings set out in the energy strategy (Couch Perry Wilkes, April 2020). The specifications shall also include full details of the fixing mechanisms, orientation, pitch and maintenance regime.

Condition

Prior to occupation, a detailed monitoring and reporting plan shall be submitted to and approved in

writing by the Local Planning Authority. The plan shall provide full details of how the carbon savings set out in the energy strategy shall be monitored with details of how and when these will be reported to Local Authority. The submitted report shall demonstrate the carbon reduction proposals have been implemented and that the development is compliant with the savings set out in the energy strategy. Measures to remedy any shortfall in carbon savings will be required. The development must be operated in accordance with the approved plan.

Reason

To ensure the development contributes to a reduction in CO2 emissions in accordance with London Plan Policy 5.2

Ecology

Condition

Prior to above ground works, a plan showing the incorporation of living walls, screens and/or roofs in the new development (main building) shall be submitted to and approved in writing by the Local Planning Authority. The living walls, screens and/or roofs shall incorporate native nectar rich planting. The development must proceed in accordance with the approved plan.

Condition

Prior to above ground works, an ecological enhancement plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall show dedicated area(s) (including the southern area bordering Minet Country Park) for the management of wildlife that can double as an outdoor learning space. The plan shall show the inclusion of a pond area for wildlife and educational purposes unless otherwise agreed in writing with the Local Planning Authority. The plan shall also include a diverse range of planting through an updated landscaping plan that has been developed to improve biodiversity. Finally, the plan shall also show the inclusion of wildlife enhancement features (i.e. bat and bird boxes as well log piles) throughout the landscaped areas and within the fabric of the buildings. The development must proceed in accordance with the approved plan.

Reason

To ensure the development incorporates measures to improve biodiversity in accordance with Policy EM7 of the Local Plan Part 1.

LANDSCAPING

This site is occupied by part of the campus, in the north-east corner, of the Guru Nanak School campus, on Beaconsfield Road. The site lies within the area covered by TPO 722, which protects an oak (T1 on the schedule) in the north-east corner of the plot. Regionally the area falls within the National Landscape Character Area 115 (Thames Valley). The site also lies within the Green Belt whereby there is a presumption against development except in exceptional circumstances.

RELEVANT POLICIES DMHB 11, DMHB14 , DMEI1, DMEI4, DMEI 7. COMMENT The proposal has been the subject of pre-application discussions, with landscape proposals last discussed at a meeting on 17 January 2020. The following comments re-iterate landscape issues discussed and any subsequent changes to the plan. The layout of the open spaces appears to be logical, functional, attractive and controllable (to facilitate out of hours access to restricted areas).

There remain some missed opportunities which would greatly enhance the scheme and contribute towards its Urban Greening Factor assessment:

- 1.The school have resisted the installation of green walls despite the fact that robust / low tech solutions exist.
- 2.The only area of green roof is a relatively modest area of sedum roof over the hall. Sedum roofs

are the simplest and least beneficial type of green roof. The main roof with PV's presents additional space / opportunity for a green roof .

3.The front edge of the school presents a bland setting dominated by hard surfacing and parking. Tree planting along the front boundary and / or within the car park could be introduced. No additional tree planting has been introduced in the front car park or along the front boundary. According to the Illustrative Landscape Masterplan, ref. 0003 Rev P04, dated 22/01/2020, pleached trees have been added to the front area, although these do not appear to be shown, or annotated, on plan?

4.Tree planting is indicated close to the rear of the building which will need to be restricted to small / fastigate trees. Following pre-application discussions additional tree planting has been provided between the tarmac play area and formal. The tarmac play area will be very hot and exposed and could accommodate a few large growing / shade-providing specimen trees without interfering with the available play / circulation space. According to the Illustrative Landscape Masterplan, ref. 0003 Rev P04, dated 22/01/2020, additional tree planting is indicated between the play area / circulation space and the formal sports areas.

SUMMARY In spite of some missed opportunities, in terms of green infrastructure. the landscape layout has much to commend it with regard to the environmental enhancement and a sense of place that will contribute to the children's well-being. The layout incorporates robust and attractive spaces which preserve and protect the TPO'd oak in the north-east corner of the site. Approximately 45 new trees will be planted to enhance the setting of the building and external spaces, together with an additional 17 trees in a new school orchard.

Further enhancements will be provided by areas of ornamental and native shrub planting. A site assessment should be made applying the GLA's Urban Greening Factor to the site, in order to qualify and quantify the contribution the scheme makes to local green infrastructure.

RECOMMENDATION No objection subject to conditions COM9 (parts 1,2,3,4,5 and 6) and COM10. An Urban Greening Factor Assessment should also be submitted.

ADDITIONAL LANDSCAPING COMMENTS

Further to my comments of 8 April 2020, a number of amended landscape plans were submitted on 4 May 2020. The key states that the revisions were made 'in response to planning comments' - without documenting (or highlighting on plan) the nature of the amendments. One feature which is noted is the proposed grass seeding of, what appears to be, the footway along Beaconsfield Road, which lies within the site boundary. The surfacing with grass in this location will mean that there is no southern footway available for pedestrians walking along Beaconsfield Road. While additional greening has been recommended along the site frontage, the place for additional planting is within the car park, not in the footway. No landscape amendments have been spotted. Please let me know if these have been scheduled somewhere?

RECOMMENDATION No objection subject to conditions COM9 (parts 1,2,3,4,5 and 6) and COM10. An Urban Greening Factor Assessment should also be submitted.

CONTAMINATED LAND

1 Summary of Comments:

Subsequent to my earlier response to the above mentioned application, an email dated 16/04/2020 from DPP Ltd (the applicants agent) suggests that my earlier comments do not appear to have reviewed a further document which was submitted with the application; the email also requested that the previously recommended conditions be revised in the light of information provided in the additional report document.

I can now confirm that I had previously inadvertently failed to detect the additional report, referred to as:

- Additional Site Investigation Remediation Method Statement, Nanaksar Primary School, Springfield Road, Hayes; Ref: 19-1650.02; Dated: January 2020; Prepared by: Delta-Simons

The submissions within the application also include the following reports to outline land conditions at the site:

- Geo-Environmental Report Nanaksar Primary School, Springfield Road Hayes; Reference: 19-1650.01; Issue Date: October 2019; Prepared by: Delta-Simons.

The above report provides an account of phase 1 and phase 2 works conducted by Delta-Simons in order to obtain additional primary data from the site. The findings were to supplement earlier works conducted by a third party.

Copies of the third party reports are also included in the application as follows:

- Phase I Geo-Environmental Desk Study, Guru Nanak School Site, Springfield Road, Hayes, UB4 0LT; Reference UK18.4283, dated December 2018; Prepared by Environmental Protection Services Ltd (EPS) : and

- Phase II Geo-Environmental Investigation, Guru Nanak School Site, Springfield Road, Hayes, UB4 0LT, by EPS, Reference UK18.4283c, dated March 2019; Prepared by Environmental Protection Services Ltd.

I have now reviewed each of the four reports submitted with the application, and my revised comments are as follows:

The Geo-Environmental details within all of the reviewed reports are in accordance with authoritative guidance, including the Environment Agency document CLR11 (Model Procedures for the Management of Land Contamination).

The three earlier dated reports provide suitable and sufficient information in terms of meeting the requirements for Phase 1 and 2 works conducted at site.

The subsequent report (Additional Site Investigation Remediation Method Statement dated January 2020) also provides suitable and sufficient information, in the form of supplementary details to satisfactorily address all issues and requirements outlined in the previous report documents, including but not limited to:

1. Provision of an acceptable method statement for remedial works, along with suitable and satisfactory proposals for how completion of the works will be verified.
2. Inclusion of suitable and satisfactory details covering a watching brief to identify/address undiscovered contamination.
3. Outline proposals to achieve the required 2.5 gas protection score in accordance with the relevant guidance and standards for mitigating risks associated with CS2 ground gas characterisation.
4. Provision of suitable soil quality Generic Assessment Criteria for Imported Materials, including requirements for any testing for asbestos which must be from a UKAS accredited laboratory and the only acceptable criteria for asbestos is 'Not Detected'; The criteria are considered acceptable as

absolute limits for all soils imported for re-use as clean cover at the subject site.

Following the above review/s of all submitted details concerning land conditions at the site, I now consider it necessary to recommend that the following amended conditions should be imposed to any planning permission that may be granted:

Recommended conditions for remediation of land affected by contamination.

(1) All works which form part of the remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority (LPA) dispenses with any such requirement specifically and in writing. The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(i) No deviation shall be made from the proposed remediation scheme without the express agreement of the LPA .

(ii) Any required addendum to the proposed 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 by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

(iv) The results from chemical testing of imported soils shall be submitted to and approved in writing by the LPA.

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 Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

3 Observations:

The Phase 1 Preliminary Risk Assessment (PRA) and Conceptual Site Model (CSM) identified the following principal contaminants of concern at the site: Total petroleum hydrocarbons (TPH); Polycyclic aromatic hydrocarbons (PAH); Volatile organic compounds (VOC) Polychlorinated Biphenyls (PCB); Metals; Asbestos containing materials (ACM) and Ground Gas. Plausible contaminant linkages were subsequently identified.

Following results from Phase 2 site investigations, the revised conceptual site model and updated risk assessment indicate that, subject to the proposed introduction of hardstanding and clean cover materials, the residual risks would be reduced to low and very low risk, with the exception of hazardous ground gas (carbon dioxide), which represents a low to moderate risk.

The Delta-Simons supplementary report (Dated: October 2019) includes a summary of details relating to impacts of the contamination on human health and controlled waters, with particular reference to previously identified principal contaminants of concern, including ground gas, detected within soils at the site.

The ground gas regime at the site has been classified as CS2 in accordance with BS8485:2015,

therefore ground gas protection measures are required. It is noted that measures outlined in the Delta Simons report are provided for guidance only; the report states "The final design of the measures and responsibility sits with the Contractor / Designer". Therefore, if planning permission is awarded, the LPA shall require full details confirming final selection/specification of the gas protection measures to be installed, validated and verified accordingly.

WASTE STRATEGY

The bin storage area is located further than 10 metres from the vehicle stopping point and therefore on site care taking / facilities staff may be required to assist with collections. Otherwise suitable for waste and recycling requirements.

(OFFICER COMMENT: In order to ensure that an approved arrangement is put in place for the lifetime of the development, a refuse management plan will be required by condition.)

AIR QUALITY

The application site is located within the declared Air Quality Management Area and approximately 460 m to the south of the Ossie Garvin Air Quality Focus Area. The proposal is for expansion of the school to accommodate additional pupils from 240 to 900 pupils along with 55 additional staff. The impacts of the school are felt beyond the site boundary in terms of the associated increases in road traffic from the school users accessing the site. Although the site itself is on the margins of an Air Quality Focus Area, the road in and out of the site connects directly, via a junction, to the Uxbridge Road which is within the Ossie Garvin Air Quality Focus Area. Air Quality Focus Areas are identified where the pollution levels are already elevated, there is relevant public exposure and where improvements in air quality are to be prioritised.

A junction assessment analysis provided by the developer confirms that with the proposal Springfield Road will experience an increase in traffic flows of around 23% and an increase in traffic flows on the Uxbridge Road of around 12%. From the information provided it is unclear whether committed developments along Springfield Road have been taken into account, therefore this could be an under-estimate. In addition the junction is shown to experience capacity issues in the future assessment year 2027. The Transport Addendum suggests that capacity issues at this junction may deter parents/guardians from driving to school supporting a mode shift in favour of active and sustainable travel. There is no evidence provided to demonstrate this will be the case, if this does not occur it simply confirms that the junction and surrounding area could be subject to increasing levels of congestion.

The assessment accompanying the application concluded that the scheme was air quality neutral and therefore no mitigation was required. This approach is not supported. The council has taken a more precautionary approach in terms of the assessment of air quality neutrality and concluded that from the information provided and from the concerns raised above in regards to the traffic increases and level of local congestion, that the development is not air quality neutral and will bring additional traffic into an already pollution-sensitive area. Using a more conservative assessment for the determination of air quality neutrality, the pollution damage costs arising from the emissions were calculated as £187, 866. Under such conditions mitigation is required. The Council requires the developer to provide a suitable mitigation strategy to allow the Council to be able to assess compliance with London Plan Policy 7.14, Local Plan Part 1 and Part 2 and the objectives of the Air Quality Action Plan.

Mitigation required

Whilst the developer has offered a number of highways improvements which will incentivise more active travel with an aim to reduce the number of trips by private car, there is little quantification given to assess the effectiveness in terms of trips reduced. Given the sensitivity of the area in regards to the impacts on the Air Quality Focus Area and that the development is a school which is

a sensitive receptor in itself, it is recommended that further mitigation is required to be provided by the developer. This is detailed below:

1 Whilst a Travel Plan will be provided it must be effective and be quantifiable in terms of reducing traffic. In addition to the mitigation sought to promote and enhance active travel, it is recommended that there is an additional requirement within the Travel Plan for a School Bus Service to be provided with quantifiable targets set for patronage and a quantified assessment of the reduction in the number of trips by private car. As the bus service will operate within an Air Quality Focus area consideration should be given for the associated vehicles to be low/zero emission technology.

2 The associated traffic from the development impacts upon an already congested junction in an Air Quality Focus Area. It is recommended that an appropriate additional highways contribution is sought to enable an effective scheme for alleviating congestion at this junction.

3 As the school is itself a sensitive receptor in terms of air quality, the landscaping scheme and active travel zone should include the use of green infrastructure specifically designed to protect the pupils from exposure on the routes to and from school.

Conditions required:

1 Reducing Emissions from Demolition and Construction

No development shall commence until a Plan has been submitted to, and approved in writing by, the LPA. This must demonstrate compliance (drawn up accordance with) the GLA Control of Dust and Emissions from Construction and Demolition SPG (or any successor document).

Reason: Compliance with London Plan Policy 7.14 and in accordance with Mayor of London "The Control of Dust and Emissions from Construction and demolition (or any successor document).

2 Non-road mobile machinery (standard condition recommended by Mayor of London, London Local Air Quality Management Policy Guidance 2019)

All Non-Road Mobile machinery (NRMM) of net power of 37kW and up to and including 560kW used during the demolition, site preparation and construction phases shall comply with the emissions standards set out in chapter 4, proposal 4.3.3.a of the London Environment Strategy. Unless it complies with the standard set out in the London Environment Strategy, no NRMM shall be onsite, at any time, whether in use or not, without the prior written consent of the LPA. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register <https://nrmm.london/>

Reason: Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy

3 Condition - Low Emission Energy Provision

No building shall commence until details are supplied to the LPA, in writing, demonstrating that any CHP or gas boilers used conform with the London Ultra Low NOx requirements as set out on the Mayor of London Sustainable Design and Construction SPG (or successor document).

Reason: Compliance with London Plan Policy 7.14 , Local Plan Part 1, Policy EM8, LB Hillingdon Local Plan Part 2, Policy DMEI 14, Hillingdon AQAP 2019-2024,

BUILDING CONTROL

1. This fire risk assessment has been reviewed as submitted, however it is not considered the final fire risk assessment. Design for means of escape, active/passive fire measures and access for the fire services will be subject to change as the scheme progresses and therefore a final risk assessment will be required to be submitted along with the Building Control application for review. 2. This fire risk assessment appears to have been produced by a suitably qualified assessor who have attempted to address the standards of Paragraph B within the London Plan Policy D12 (Fire Safety) 3. These comments do not prejudice any formal comments made by the London Fire Emergency Planning Authority (LFEPA). A consultation to the LFEPA will be made as part of the Building Control

application process. 4. The final Fire Risk Assessment will need to be checked by a suitably qualified Fire Safety Specialist in order to discharge the Policy D12 planning condition and any costs to be recovered.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The site accommodates an existing (Nanaksar 2FE temporary school) educational facility and is bounded by a further education facility (Guru Nanak Secondary School). It also comprises of a large playing field and falls within the Green Belt as designated in the Hillingdon Local Plan. It has no other specific designations. Accordingly, the key issues pertaining to the principle of development relate to the permanent nature and intensification of the educational use of the site, the impact of the development on the Green Belt and impact on the playing fields.

NEW EDUCATIONAL FACILITIES:

In respect of new developments for educational facilities there is strong support for this at local, regional and national level.

At local level the supporting text of DMCI 1A of the Local Plan: Part Two (2020) states the Councils commitment to continuing to meet the required number of primary school places.

The policy itself sets a specific assessment criteria for new schools. It states that the local planning authority will take into account the size of the site, its location and suitability to accommodate a new school or school expansion taking account of compatibility with surrounding uses, and the local highway network and its ability to accommodate new or additional school trips without adverse impact on highway safety and convenient walking and cycling routes to schools.

This is reiterated in the London Plan, 2016, Policy 3.18 which states:

"Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes. Those which address the current projected shortage of primary school places will be particularly encouraged."

Furthermore on 15/08/11 the Ministry of Housing, Communities and Local Government (MHCLG) (formerly known as DCLG), published a policy statement on planning for schools development, which is designed to facilitate the delivery and expansion of state-funded schools. It states:

"The Government is firmly committed to ensuring there is sufficient provision to meet growing demand for state-funded school places, increasing choice and opportunity in state-funded education and raising educational standards. State-funded schools - which include Academies and free schools, as well as local authority maintained schools (community, foundation and voluntary aided and controlled schools) - educate the vast majority of children in England. The Government wants to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities. This will allow for more provision and greater diversity in the state-funded school sector to meet both demographic needs and the drive for increased choice and higher standards."

It goes on to say that;

"it is the Government's view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations. We expect all parties to work together pro actively from an early stage to help plan for state-school development and to shape strong planning applications. This collaborative working would help to ensure that the answer to proposals for the development of state-funded schools should be, wherever possible, "yes".

The statement clearly emphasises that there should be a presumption in favour of the development of schools and that "Local Planning Authorities (LPA) should make full use of their planning powers to support state-funded schools applications."

Paragraph 72 of the NPPF 2019 reiterates the objectives set out in the Ministerial Statement on Planning for Schools Development. It clearly confirms that the Government attaches great importance to ensuring that a sufficient choice of school places are available to meet existing and future demand.

The proposal is considered to fully comply with this strong local, regional and national policy support for new, enhanced and expanded educational facilities.

GREEN BELT

Notwithstanding the above, the development nevertheless represents inappropriate development within the Green Belt.

Policy EM2 of the Local Plan: Part 1(2012) confirms that any proposals for development within the Green Belt will be assessed against national and London Plan polices, including the very special circumstances test.

Policy DME1 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), confirms that only predominantly open land uses will be considered acceptable within the Green Belt and that planning permission for other uses will not be granted.

Notwithstanding this, it must be noted however that paragraph 8.27 of the Local Plan: Part 1 (2012), states that "in very exceptional circumstances the Council will consider the release of Greenfield sites for schools."

London Plan policy 7.16 (2016) confirms that the "strongest protection" should be given to London's Green Belt, in accordance with national guidance, and emphasises that inappropriate development should be refused, except in very special circumstances.

Paragraph 145 of the NPPF (2019) makes it clear that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It states that:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."

In view of the above is not considered that the scheme would meet any of the exceptions test outlined within Paragraph 145 of the NPPF (2019) and therefore it would constitute

inappropriate development in the Green Belt. The scheme should therefore only be approved in very special circumstances which outweigh the harm to the Green Belt by reason of the inappropriateness and any other harm resulting from the proposal.

The applicant has submitted a Planning Statement and Design & Access Statement which seeks to set out a case of very special circumstance to justify the provision of the development in this Green Belt location. These centre around the applicants assertion that the development would have limited additional impact on the Green Belt, enhanced community facilities and the need for additional and improved school places as well as the lack of alternative sites.

Establishing the need for additional places

With regards to the very special circumstances, the applicant has stated that the primary justification is the need for new primary school places to address projected unmet need. There are a number of supplementary documents for which the LPA refer to when assessing the need for school places, one of which is the Development Infrastructure Funding Study (DIFS) (2017). The DIFS (2017) sets out the requirements for delivering infrastructure to support the growth within the Hayes Area which is where the school is located. The documents states that there will be a growing demand for primary places in the south of the borough and specifically in Hayes due to a number of large scale housing developments. Nine new forms of entry were expected to be needed in the south of the Borough by 2023/24, with 6 of these being needed in the Hayes area.

Furthermore the Quarterly School Place Planning Update (Feb 2020) provides the census data and updated projections for primary and secondary needs within Hillingdon. The report breaks down the needs for specific areas and identifies each area via a reference such a PPA 11 which is the reference given to the location for which the application site is located. It is clear within the report that the PPA11 projection already takes into account the plan to re-open the 2FE school in September 2020 for reception classes within temporary buildings. It should be noted that a separate application has been received for the relocation of the temporary buildings within the wider school site shared with Guru Nanak.

Moreover the School Place Planning Project Manager at the London Borough of Hillingdon has commented on the proposal and stated that the need for extra places is evidenced by the Council's education planning projections. The school is in Hayes, an area of growing demand for more primary places, and with substantial new housing developments. Also, the school is likely to recruit some pupils from a wider area of the borough and beyond, as it has done previously along with Guru Nanak school, due to their admissions criteria giving some priority to those of the Sikh faith and location by the boundary with Ealing. Both schools are very popular with parents and have consistently high levels of pupil achievement and active local social and community engagement. This is compounded by the submission of a detailed educational needs assessment report for a Sikh-faith primary school places in the school's catchment area. The report demonstrates that there is a compelling educational need for pupils from the Sikh community in the catchment area (within a 3-mile radius). Therefore, this is accepted as a very special circumstance and this view is shared by the GLA.

Lack of alternative sites

Following pre-application advice the applicant has undertaken a sequential test which is

used to identify alternative sites which could accommodate a school of a similar size in a more suitable (not green belt land) location within a designated catchment area.

The sequential test has been undertaken on a number of agreed assumptions between the local planning authority and the applicant. The catchment area is a 3 mile radius from the site. This covers PPA 11, as well as the majority if not all of the area contained within neighbouring PPAs and is therefore considered appropriate. The test has also been undertaken on the need for a site of at least 0.65 ha, which is below the typical minimum size of 0.8ha that is usually used by the Education Funding Authority (EFA) in London Boroughs and therefore the applicant has demonstrated flexibility in terms of format.

Over sixty potential sites (28 of them brownfield) were assessed and the reasons why the current application site was selected and the rest of the potential sites were rejected were set out. The sequential test has discounted sites that would not be available in the near future. This is considered to be pragmatic noting that the need for new primary school places is already growing and time will be required after the planning process to construct the school. In assessing the sequential test the LPA's Planning Policy Officer has stated that whilst we cannot agree with all of the justifications for discounting some sites, it is agreed that all sites can be discounted but on different grounds than what is set out in the sequential test. It is therefore considered that the sequential test is robust and provides a strong argument for why the application site is the most preferable site having assessed all other available land within the identified catchment area.

Co-location

In addition to the above, the applicant has considered the possibility of co-location with other schools at a different site, however no agreement could be reached. Notwithstanding this, the proposed location of the school is considered to be a form of co-location within an existing community of schools given its close proximity to the existing schools on Springfield Road and the ability to share facilities has also been put forward as a benefit of the scheme. It should be noted however that, considering the importance that government attaches to Green Belt in Paragraph 133 of the NPPF (2019), when taken in isolation this should not amount to the very special circumstances required to outweigh the harm of this development. However it should be considered as part of the cumulative set of very special circumstances.

Visual impact

In terms of visual impact, the site currently comprises the existing temporary accommodation with its ancillary space (outdoor space, drop-off area, car parking etc.) which is focused and contained in the most northern part of the site, along Beaconsfield Road. The existing accommodation is relatively small in scale compared to the proposed development, as it is single storey (3.7m in height) and has a floorspace of just 380m². Importantly, the existing development has been permitted on a temporary basis until 30th September 2020 and therefore its impact on the Green Belt is also only temporary. It is therefore acknowledged that the application for a larger, permanent building would present a greater impact to the visual openness of the Green Belt.

The applicant has stated that the school has been oversubscribed for an a number of years and this has been verified with the Councils Schools Placement Team. It is therefore acknowledged that the school would emphasise the need for a building which can accommodate more pupils in comparison to what could be achieved within the parameters

of the existing temporary modular units.

The proposed building would predominantly increase to 3 stories and would be characterised by a flat roof measuring 12.3 metres. The internal floor space would increase to 3,795m². Whilst it is clear that the aforementioned increase in the quantum of the built form is significant, the front facade which is where the bulk of the 3 stories is located, would front Beaconsfield Road which comprises of a number of buildings of a similar scale. The built form is not the only element of the scheme for which harm can be attributed. The requirement for additional hard surfacing to both the front and rear of the building to serve as the drop off area/car park and play space is considered to have a moderate adverse impact on the Green Belt.

The applicant's Design and Access Statement demonstrates that a number of options have been carefully considered to ensure that the impact of the development on the openness of the Green Belt is minimised as much as possible. When assessing this statement consideration needs to be given to the level of impact to the openness and the view of the Green Belt which are resultant of the scale and design of the built form as well as the associated hard surfaced areas.

The site is bounded by Guru Nanak School to the west which is a secondary school and therefore considerably larger than the proposed primary school. To the north of the site is a number of strategic industrial parcels which accommodate large buildings such as film studios, cash and carries and large warehouse space with associated office space. To the east of the site is the Hayes and Yeading Football Club facility which comprises of a number of artificial grass pitches and a modest sized spectator stand. With this in mind it is clear that the sense of openness when viewed from Beaconsfield Road is reasonably diminished given the presence of the industrial/functional buildings which create the street scene and give the impression of more urbanised location. Notwithstanding the above there are a number of open areas created through the separation distance of the clusters of buildings and in particular the entrance to Minet Country Park which form a more attractive view over the Green Belt than others.

Whilst the application does clearly propose a larger building which inevitably will have a greater impact to the openness of the Green Belt when taking into consideration the building would be located in an area occupied by the existing temporary school on site, the bulk of the three storey element would front Beaconsfield Road which is already characterised by large industrial and functional buildings and the fact that the site is bounded by the modest scaled football club, and the Guru Nanak Secondary School, the visual harm could be outweighed by the benefits of the scheme.

Impact on playing fields and provision of enhanced sports facilities and community benefits

The proposed development would result in alterations to the layout of the site, which would affect playing field provision. Paragraph 74 of the NPPF (2019) states that:

"Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which

clearly outweigh the loss."

Policy 3.19 of the London Plan (2016) expects development proposals to increase or enhance the provision of sports and recreation facilities. Proposals that result in a net loss of sports and recreation facilities, including playing fields should be resisted.

Policy S5 of the draft London Plan (2019) seeks to retain existing playing fields unless (among other criteria) the loss resulting from the proposed development would be replaced by equivalent or other better provision in terms of quantity and quality in a suitable location or the development is for an alternative sports and recreational provision and the benefits of which clearly outweigh the loss of current and former use.

Policy DMCI 1A of the Local Plan: Part Two (2020) requires new schools to consider their impact on green open space, games pitches, outdoor play and amenity space, taking account of the character of the area, whether the site is within an area of open space deficiency and whether the school has sufficient outdoor space for play and games.

Further to the above, the 'Playing Fields Policy' states that 'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of all or any part of a playing field, or land which has been used as a playing field and remains undeveloped, or land allocated for use as a playing field, unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.'

The five specific exceptions are identified as follows:

1. 'A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.'
2. 'The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.'
3. 'The proposed development affects only land incapable of forming part of a playing pitch and does not:
 - reduce the size of any playing pitch;
 - result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
 - reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
 - result in the loss of other sporting provision or ancillary facilities on the site; or
 - prejudice the use of any part of a playing field and any of its playing pitches.'
4. 'The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:
 - of equivalent or better quality, and
 - of equivalent or greater quantity, and
 - in a suitable location, and
 - subject to equivalent or better accessibility and management arrangements.'
5. 'The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.'

The proposed development would present a loss of the proportion of the school playing

field therefore Sport England have raised an objection for which the applicant has stated that exception 5 applies and provides a number of documents as evidence to substantiate this exemption.

With regards to the playing field which would be lost, the applicant has provided a plan which demonstrates the net loss/gain with reference to both the loss of the field and also the actual sports pitch net gain. The existing playing field measures 10,227 sqm and the applicant has stated that they are currently not used for sports use and do not meet the minimum guidelines measured by the Sport England Performance Standards. Sport England agreed with this comment in their initial consultation response but also added that many of the school or similar fields do not have to meet the size standards in order to be considered valuable and instead are considered to be informal recreational space.

Notwithstanding this it is important to consider why the playing field remains underused. The planning application submission was accompanied by a 'PSD Agronomy report', which Sport England acknowledged within the attached objection, confirms that the existing playing fields are uneven and present drainage issues. The report confirms these issues to be core to the usability of the existing pitches, which currently make them an extremely difficult location for outdoor sport activities all year round. The report identifies that the existing playing fields comprise significant slopes and undulations greater than 20mm in depth. It is also noted that there is a presence of ground source heat pumps below the site and, as such, trenches from installation may have settled over time which could have contributed to the formation of undulations, which can only be removed via remediation works in the form of topping up to surface level, seeding and fertiliser application. Additionally, the topsoils within the site (silt loam with high stone content) are generally concluded as offering moderate to poor infiltration rates due to high clay and silt contents, with examples of flints and pebbles exceeding more than 32 mm in the longest axis recorded just below the surface. The findings within report are recognised by Sport England within the most recent comments where they state " The agronomy report undertaken does indicate that the playing field does not meet the performance standards guidelines"

The Proposed Development will deliver a total of 8,307 sqm (covering 45.85% of the Site) of sports provision in the form of 2 MUGAs, 1 basketball court, 1 youth soccer pitch and 1 mini-soccer pitch. The new sports facilities will provide a high quality all-weather pitch which will allow for a range of sports facilities to ensure that alongside the wider campus provision, Nanaksar Primary pupils will get the opportunities for sport that they require whilst also improving the campus wide facilities on offer. The three ball courts are multi-use offering a wide range of sports and the Artificial Turf Pitch offers a high-quality sporting facility. Therefore, whilst the proposed development would involve the permanent loss of 10,227 sqm (covering 56.45% of the Site) of identified playing fields. In reality these facilities are not currently in a condition which allows them to be used. The loss of this land for the provision of a new school will enable the creation of new high quality facilities for school pupils and the wider community on a site which is not currently used for any sports.

Furthermore, to respond to the net loss of sport provision area, the layout of the proposed facilities works to maximise efficiency of provision. This results in an increase in usable sport pitches and total area (a net gain of 1,523 sqm as per the accompanying Sports Provision Net Loss Gain Analysis drawing by Ares). To further improve the sport provision, the proposed development improves the pitch specifications to offer year-round facilities via an Artificial Grass Pitch and 3 asphalt ball courts. Whilst there is an existing Artificial

Grass Pitch (AGP) within the wider Guru Nanak secondary school site, this is a short pile specification with the priority for hockey. The proposed AGP is a long pile specification with a priority for football.

The 2 proposed MUGAs are multi-use, offering a wide range of sports provision for football, tennis, and netball, alongside the 1 basketball court, which have been designed to ensure that they are appropriately sized in line with Sport England guidance. However, following Sport England's comments regarding their quality for sports provision, rebound fencing has been incorporated around the proposed 2 x MUGAs.

The proposed AGP and outdoor sports facilities, including 2 MUGAs and 1 basketball court, are therefore essential components of the proposed development as they would allow for the provision of a range of sports facilities to ensure that the future pupils get the opportunities for sport and physical activity that they require. Allowing such proposed facilities to be used by the community will also enable the opportunity to improve the health and well-being of the community in addition to pupils.

With regards to the sports provision being made available to the public this would be secured by way of a condition pertaining to the submission of a community use agreement however it is noted that a draft copy has been submitted. This remains one of the final concerns raised by Sport England who are yet to be satisfied with the level of access those outside of the school would have to the sports pitches. Within the most recent set of comments Sport England outline the lack of evidence to state that there is or isn't a surplus of artificial sports provision within the area and this is mainly driven by the presence of the existing AGP within the wider Guru Nanak site and also the neighbouring football club. As stated above the AGP within the Guru Nanak site is best suited to hockey rather than football which is the intended use of the application AGP. Sport England has stated that they are concerned with the lack of uptake which could be apparent due to the non inclusion of sports lights something of which the neighbouring football club benefit from. During pre-application discussions the inclusion of sports lights was discussed however, given the sites close proximity to the wildlife and river corridors as well as the habitats within the Minet Country Park, it was considered that sports lights would not be acceptable in this location. Furthermore sports lights would jeopardise the proposed habitat buffer and ecological learning zone along to the south of the proposed AGP. Whilst it is clear that the community facility (AGP) within the football club site benefits from floodlights/sports lights and is in a similar location, this is full size adult pitch. Consequently, whilst the presence of alternative AGPs in close proximity to the site cannot be ignored, it is important to note that these facilities make provision for different sports and age groups than those that will cater for the new school site.

In conclusion, whilst Officers acknowledge Sport England's objection to this application, the Council's planning policies DMCI 1A do allow for consideration of whether the proposed school will retain sufficient outdoor space for play and games. It is considered that the applicant has demonstrated that despite a loss in area due to its very limited use, there will be a significant overall improvement in the quality and variety of sports pitches available to the school and the local community following the redevelopment of the site. This is a material consideration that weighs in favour of the development.

Officers are satisfied that an appropriate balance has been struck between planning and educational policy requirements such that the development meets the practical needs of the school whilst ensuring there is no overall loss in quality sports provision. Officers are of the view that the educational need for the proposals carries significant weight, which would

outweigh any loss in sports provision Sport England may argue.

The Ministerial Statement on planning for schools is clearly an important material planning consideration. It is important to understand the 'weighting' that should be given to this as a material planning consideration. Officers have undertaken a search of appeal decisions concerning new education developments that affect either playing fields or open space to understand how Planning Inspectors have interpreted the Ministerial Statement.

A search of a national appeals database identified 4 appeal cases where loss of open space or playing field was involved.

Where the schemes are of direct relevance is that in each case the decision maker had, in effect, to decide whether a clear education need outweighed other strong material planning considerations. All 4 appeals (namely the appeal by Chapel Street Community Schools Trust for a free school on open space in Oxfordshire, a new free secondary school by 'Great Schools for all Children' in Warrington on public open space involving the loss of a sports pitch and Poulton Church of England Primary and Nursery School's planning application in Gloucester for a school on open space) was allowed and significant weight was given by the appeal inspector to the education need in every case.

In the Warrington case (which is a 2014 case) the Council in refusing the planning application stated:

"The playing fields offer significant benefits to the local community due to the sports pitches available and their accessibility and close proximity to residents, community groups and schools."

Sport England did not object subject to conditions regarding the submission, agreement and implementation of a sports development plan and community use agreement, the details and specifications of the sports hall, changing rooms and artificial grass pitch and a scheme for the improvement of the remaining playing fields are required to ensure that there is sufficient benefit to the development of sport, suitable arrangements for community access and that the loss of the existing playing fields on the site is effectively mitigated.

It should be noted that Sport England therefore appear to have been satisfied that conditions could be used to address potential policy conflicts. The Inspector in allowing the appeal stated;

"There are differing views as to the potential effects on existing schools and the justification for the proposed school in terms of the need to raise educational standards. What is clear however is that the proposal will create an additional school, increasing the number of school places available and creating greater choice and diversity for secondary education in the area. In the context of the Framework and the Ministerial Policy Statement, this constitutes a significant benefit that carries substantial weight."

What these appeal cases show is that decision makers are expected to place substantial weighting on the Ministerial Statement and that it is a very important material planning consideration. As such, officers consider that the educational need argument outlined by the applicant with respect to schools should be given substantial weighting as a material planning consideration.

Taking all matters into consideration, including current planning policy wording at local,

regional and national level, the applicant's and Sport England's arguments, it is very difficult to see how an objection from Sport England could be upheld in this instance. This application is supported by a well reasoned justification that demonstrates there would be no loss in overall sports provision in terms of quality.

Conclusion

The primary special circumstance is considered to be the need for additional primary school places particularly within this part of the borough. The applicant's planning statement and DAS provide details of this need and this is further supported by up-to-date information from the Council's Schools Placements Project Manager. The applicant has also demonstrated to the satisfaction of officers that there are no suitable alternative sites within the relevant school place planning area. Consideration should also be given to the ministerial statement which states the need for improved and new educational facilities as a very important material planning consideration thus should be given substantial weight in the decision making process.

Consequently, it is on the basis of the need for additional primary school place provision in the Hayes areas that the applicant is able to demonstrate very special circumstances which are considered to outweigh the harm caused by the inappropriate development within the Green Belt. Furthermore, officers are content that whilst the development presents an impact to the openness of the Green Belt, the development has been designed to minimise the impact and this is apparent through the submission of the Visual Impact Assessment.

It is noted that the loss of playing fields has also been a point of objection by Sport England together with concerns about the use of replacement facilities by the wider community. Officers are satisfied that in this instance, due to the non-utilisation of the existing playing fields and the enhanced facilities proposed for use by pupils and the community, that the development of part of the site for a new school will not have a detrimental impact on the provision of sports provision. Furthermore, by broadening the type of provision the range of sports facilities available will be enhanced.

Taking the above points into consideration the principle of development is considered acceptable.

7.02 Density of the proposed development

The application relates to new educational development. Residential density is therefore not relevant to the consideration of this application.

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

There are no Conservation Areas, Listed Buildings or Areas of Special Local Character within the vicinity. Although the application site does not fall within a designated Archaeological Priority Area, there is a requirement to consult Historic England's Greater London Archaeological Advisory Service (GLAAS) due to the size of the site. An Archaeological Desk-Based Assessment has been submitted in support of the application and GLAAS have been consulted. No objection has been raised and there is no further requirement for conditions.

7.04 Airport safeguarding

The proposed height of the development raises no airport safeguarding issues.

7.05 Impact on the green belt

This issue has been partly addressed in part 7.01 of the report.

The application site and the adjoining secondary school currently comprises school buildings, which range in height from one to three-storeys, playgrounds, car parking, playing fields and ancillary development. It is bounded to the north by Beaconsfield Road, beyond which are large scale industrial buildings, and to the east by Yeading Football Club and its associated stands and clubhouse. The proposed built form would largely be located within an existing developed part of the site, comprising of existing temporary accommodation for the 2FE primary school and a large area of hardstanding used for the primary school car park and pick up / drop off area.

Accordingly the proposed development would be seen in context with the wider school site and surrounding large scale buildings.

In terms of visual impact, the existing accommodation is relatively small in scale compared to the proposed development, as it is single storey (3.7m) and has a floorspace of just 380m². Importantly, the existing development has been permitted on a temporary basis until 30th September 2020 and therefore its impact on the Green Belt is also only temporary. It is therefore acknowledged that the application for a larger, permanent building would present a greater impact to the visual openness of the Green Belt.

Minet Country Park bounds the wider school site to the south. Large bunds within that park, which bound the school site, helped limited views of the existing temporary school from the wider Green Belt. Whilst the proposal extends much further into the Green Belt than the existing arrangement and also proposes an increase in scale, bulk and massing the bunds would still provide some form of obscurity when viewed from the Country Park.

The proposed building would predominantly increase to 3 stories and would be characterised by a flat roof measuring 12.3 metres. The internal floor space would increase to 3,795m². Whilst its clear that the aforementioned increase in the quantum of the built form is significant, the front facade which is where the bulk of the 3 stories is located, would front Beaconsfield Road which comprises of a number of buildings of a similar scale. The built form is not the only element of the scheme for which harm can be attributed. The requirement for additional hard surfacing to both the front and rear of the building to serve as the drop off area/car park and play space is considered to have a moderate adverse impact on the Green Belt.

The applicant's Design and Access Statement demonstrates that a number of options have been carefully considered to ensure that the impact of the development on the openness of the Green Belt is minimised as much as possible. When assessing this statement consideration needs to be given to the level of impact to the openness and the view of the Green Belt which are resultant of the scale and design of the built form as well as the associated hard surfaced areas. The applicant has also submitted a Visual Impact Assessment which provides seven established key views from which the proposed development is likely to be visible from.

The views provided are as follows;

- View 1 : Looking north west from Yeading Brook
- View 2 : Looking west from Yeading Brook
- View 3 : Looking west from Yeading Brook 2
- View 4 : Looking east from A312 Road
- View 5 : Looking north east from A312 Road
- View 6 : Looking east from Minet Country Park

View 7: Looking east from Minet Country Park 2

With regards to views 1,2 and 3 these views are dominated by large deciduous trees growing by the edge of the water. The buildings with the Guru Nanak Academy campus can be seen clearly within these views with additional views of the Hayes and Yeading Football Club offered from view point 2. The appraisal concludes that the proposed new building would be obscured by trees when viewed from, view point 2 and would be visible within the cluster of educational buildings or the Football Club buildings from view points 1 & 3. It is therefore considered that the proposed would cause a slight deterioration of these existing views.

With regards to views points 4 & 5 which are taken from the main A312 Road. In commenting on the proposal the council's Planning Policy Officer stated that the view point 5 should be retaken as the photo differed from the location indicated on the map within the assessment document. This photo has been re-submitted having been taken from the correct location. It is evident that both views would be significantly obscured due to the dense woodland apparent within the Minet Country Park thus there would be no deterioration of these existing views.

View points 6 & 7 are taken from within Minet Country Park and whilst the new building would not be seen from view point 7, arguably view point 6 would offer the most prominent view of all of the above locations. The school building would be visible from behind the cluster of the Guru Nanak Academy buildings however the photo demonstrates that there is some tree planting within this location which will assist with obscuring the view and the choice of materials assists with softening the visual impact and presents a view not dissimilar to what is offered now.

Further to the above the views offered from Minet Country Park are considered to be the most prominent and therefore it is regrettable that the school has chosen not to include rear facing green walls which could have softened the views of the rear elevations. It is understood that as a DFE funded project there is an element of cost analysis which the applicant needs to take into consideration when balancing the functionality of the school as well as the design requirements imposed by planning policy. It is noted that the applicant has stated a willingness to review the possible inclusion of a green trellis which could be beneficial therefore a condition has been included to ensure further investigation of green walls and other types of walling which could soften the impacts of the views offered from Minet Country Park is undertaken.

Accordingly, the size, scale and height of the proposed building and associated structures and other areas (playspace, sports pitches) are not considered to be obtrusive in this location. The design is considered to be acceptable and would not have an adverse effect on the openness of the Green Belt or the visual amenities of the surrounding area.

7.07 Impact on the character & appearance of the area

Paragraph 131 of the NPPF (2019) requires that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Policy 7.6 of the London Plan (2016) requires new developments to make be of the highest architectural quality and be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm.

Policy D1 of the London Plan (2019) requires all development to make the best use of land by following a design led approach that optimises the capacity of sites. 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

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) re-emphasises the importance of good design in new development by;

- A) requiring all new buildings and extensions to be designed to the highest standards, which incorporate principles of good design, such as harmonising with the local context by having regard to the scale, height, mass and bulk of surrounding buildings; using high quality materials and finishes; having internal layouts and design which maximise sustainability and the adaptability of the space; protecting features which contribute positively to the area and providing landscaping that enhances amenity, biodiversity and green infrastructure;
- B) avoiding adverse impacts on the amenity, daylight and sunlight of adjacent property and open space;
- C) safeguarding the development potential of adjoining sites and
- D) making adequate provision for refuse and recycling storage.

Policy DMHB 12 of the Local Plan: Part Two (2020) re-emphasises the need for new development to be well integrated with the surrounding area and provides design criteria as to how this would be achieved.

The proposal seeks the redevelopment of the Land Adjoining Guru Nanak Sikh Academy which currently accommodates the existing 2FE primary School (Nanaksar). The site is located along the southern side of Beaconsfield Road which leads from Springfield Road. The character of the street scene (both Beaconsfield Road and Springfield Road) comprises of a mixture of educational, sports and industrial/functional buildings which are of a large scale.

To the east of the site is Hayes and Yeading United Football Club consisting of two playing pitches, a seated stand and associated car parking. To the west of the site are numerous buildings and several playgrounds associated with Guru Nanak All-through School. South of the site is an all-weather sports pitch and the Minet Country Park.

The proposed development would feature a 1-3 storey T shaped building for which the bulk of the building would front Beaconsfield Road and the remainder of the building would tunnel along the boundary shared with the football club car park. The proposal also includes facilities such as the hall which has been located so that it could be used for events outside of school hours and be made available to the public, the Multi Use Games Area (MUGA) and the All Weather Pitches (AWP) which will be subject to a community use agreement to allow those outside of the school to benefit from the facilities.

The location of the building has been dictated by a number of constraints with the most important being the sites location within the Green Belt. A design approach has therefore been taken to try and limit the overspill of the floor area outside of the floor area of the existing school. However it is clear that there will be some overspill given the increase in capacity for which the school is trying to achieve. The building has been set back from the main highway to allow adequate space for the necessary quantum of parking which will also act as a pick up and drop off area for pupils attending the school. Whilst this does present the potential for an increase in the impact to the Green Belt, the set back from the

existing front building line of the temporary huts is minimal.

Furthermore the location of the building and its design ensure that the bulk of the building is set towards the main frontage which is similar to the surrounding buildings. It is therefore considered that the proposed location of the building close to Beaconsfield Road is appropriate as it would help to keep development close to already developed areas.

The scale of the building would be significantly smaller than the adjacent high school and the height would be no greater than these buildings either. A contemporary and functional design is proposed whilst using traditional materials comprising of mainly light coloured brickwork which creates a welcoming visual appearance balancing a fresh and independent identity for Nanaksar Primary School. The addition of a much darker red brick on some of the feature walls assists with breaking up the elevations to create more interesting views of the building.

The front of the building would feature an element of cladding over the main entrance. Whilst the LPA would normally steer away from the use of cladding, the proposed elevations illustrate that the cladding is a deliberate prominent feature which includes the school motif and can be conditioned to ensure the cladding is of a good quality.

The proposal includes facilities such as the hall at the centre of the school, the Multi Use Games Area (MUGA) and the All Weather Pitches (AWP). Views of these areas would be restricted from all areas outside of the development due to the boundary fencing around the perimeter of the site however it is noted that the 3 m high welded mesh fencing which surrounds the AFG would be partially visible due to its height. However the fencing is proposed to be green in colour and therefore less prominent from a distance which is dictated by the field to the south.

It is therefore considered that the proposed development would be viewed in context with the existing school site and surrounding large scale developments and, as such, would not be visually obtrusive in this location. For these reasons, and those discussed in part 7.01 and 7.05 of the report, it is not considered that the proposal would have an unacceptable impact on the visual amenities of the Beaconsfield Road street scene or the surrounding area.

7.08 Impact on neighbours

Policy DMHB 11 (2020) requires that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

There are no residential properties within the vicinity of the site. The immediate neighbours are the Guru Nanak Secondary School for which the primary school would directly associated to given that they will be managed by the same trust. The site is also bounded by the Minet Country Park and the Hayes and Yeading Football Club neither of which would be impacted by the proposed development.

The proposed built form and associated areas (parking, play space and sports provision) are not considered to appear over dominant against the back drop of the neighbouring sites which feature large open spaces and built form of a greater scale.

It is therefore considered that the proposed development would not impact the visual amenities of the neighbouring properties or open space.

7.09 Living conditions for future occupiers

This consideration relates to the quality of residential accommodation and is not applicable

to this type of development. However, it is considered that the proposed development, which has been designed to accord with Department for Education standards, would provide an appropriate environment for the future staff and pupils.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Policy DMT 2 of the Local Plan: Part Two (2020) notes development proposals must ensure that safe and efficient vehicular access to the highways network is provided to the Council's standards.

Policy DMT 6 of the Local Plan: Part Two (2020) sets maximum car parking standards. For a development of this type it is required that the quantum of car parking provided is determined 'on an individual basis using a transport assessment and a travel plan, and in addition provision for taxi and bus/coach access and parking'.

The application site is accessed from Beaconsfield Road, a two-way single carriageway road which forms the southern boundary of the Springfield Road Industrial Estate. Beaconsfield Road intersects with Springfield Road at a mini-roundabout adjacent to the north-west corner of the site. Springfield Road functions as a spine road for the Springfield Road Industrial Estate, connecting Beaconsfield Road in the south, to Uxbridge Road (A4020) in the north.

Springfield Road is an adopted public highway leading off the busy A4020 Uxbridge Road, it benefits from a 30 mph speed limit, street lighting and footways on both sides of the road. Along the southbound carriageway that borders the site, there is a mix of single yellow lines operational Monday to Friday 07:00 to 09:00 and 14:30 to 16:30 hours, double yellow lines and no parking restrictions at all. On the opposite side of the road there are double yellow lines only.

Springfield Road provides access to a range of uses including a hotel, a small retail park, wholesale retailers, small medium enterprises as well as Minet Country Park open space, the Guru Nanak Sikh Academy, Goals 5-a-side football pitches and Hayes and Yeading Football Club. The road is characterised by heavy good vehicles making deliveries/parking on-street, cars parked on-street and school traffic generated by the Sikh Academy.

Uxbridge Road (A4020) is a dual carriageway which connects to Shepherds Bush in the east and Uxbridge in the west. Uxbridge Road (A4020) intersects with The Parkway (A312) approximately 300m west of the Springfield Road junction at a large signalised roundabout known locally as the Ossie Garvin Roundabout.

There are three pedestrian routes into the site area; one via Springfield Road and two via Minet Country Park. One access through Minet Country Park is via a underpass from a shared pedestrian/cycle route at Abbotswood Way to the west of the site. The other Minet Country Park route connects to the Ossie Garvin Roundabout and the segregated pedestrian and cycleway routes provided across the roundabout.

The development site is a 30-minute walk (1.6 miles) from both the Southall and the Hayes and Harlington train stations and a 10-minute walk (0.5 miles) to the Uxbridge Road (A4020) bus stop.

According to the Transport for London WebCAT service the application site has a PTAL ranking of 0 indicating access to public transport is poor compared to London as a whole. This suggests that there would be a higher reliance on the motor vehicle to make trips to and from the school.

The existing primary school benefits from an area of hardstanding which fronts Beaconsfield Road and this provides an area dedicated to pick up and drop off and accommodates 2 staff parking spaces.

The proposed plans illustrate 27 staff car parking spaces 3 of which would be blue badge/wheelchair accessible. The proposal states the commitment of 10% of parking spaces would be provided as active electric charging spaces and notes a further 10% would be provided as passive electric spaces. As such 5 active spaces and 5 passive spaces have been secured via the landscaping condition.

The bin store is located at the north-eastern corner of the site, adjacent to the cycle store. This enables refuse vehicles to use the one-way vehicle access/egress system and stop adjacent to the bin store for collection. The refuse collections will be scheduled to occur outside of the drop-off/pick-up periods.

The proposal extends and formalises the existing drop off area at the front of the site which will provide an area for 23 vehicles. These spaces form a queue around the car park edge and wraps around the area which is illustrated to be the entrance to the school building. The vehicles would be expected to enter the car park via the access abutting the eastern boundary shared with the football club and exit via the western boundary.

The Transport Assessment Addendum describes how the development will be changed to include 112 long-stay cycle parking spaces of which 5% will be suitable for use by larger bicycles. The 12 short-stay cycle parking spaces originally included will still be provided. In response to comments made by LB Hillingdon, the Transport Assessment Addendum provides further details regarding coach access and passenger drop-off/pick-up arrangements.

In response to the Highway Officers comment relating to coach park it is proposed that coaches will use the drop-off route in front of the school, the same as a refuse vehicle. The refuse vehicle which was previously tested under swept path analysis is 10.5m long and is able to negotiate/navigate the drop-off route in front of the school successfully. For completeness a swept path analysis has been submitted demonstrating that coaches can negotiate the roundabout and both enter and exit the site without compromise.

A Transport Assessment has been submitted alongside the application which provides details pertaining to the number of trips that the development would generate and uses a relevant model to allow the Highway Authority to assess the impact these trips would have upon the local highway network. The transport assessment indicates that the AM peak period is when the greatest number of trips would be generated.

Travel survey data has been included and demonstrates that in 2019 out of the 240 pupils the school currently accommodates 41% arrive by car, the developer then reports that as 35% of pupils car share, this equates to 64 cars arrive each morning to drop students off and then leave. Of the 20 teachers working at the school, the same travel survey found that 93% commute by car. Adding the number of car trips generated by pupils and teachers together, the developer reports that the development currently generates 83 car trips in AM peak.

The new development would have 840 pupils, assuming the mode share remains the same and 35% of pupils car share then the new school would generate 224 pupil and 51 teacher car trips in the AM peak, 275 in total, an increase of 192 car trips. However, not all

of these pupils arrive at the same time, over a third of pupils, 38% attend a breakfast club and are already at the school before most children arrive. Taking this into account it is forecast that 140 cars would arrive just before the school day begins.

As requested by the GLA, the applicant has carried out an assessment of the Uxbridge Road/Springfield Road junction to determine whether it has the capacity to cater for any uplift in car trips generated by the school expansion as well as background traffic growth. The report demonstrates that the junction is shown to experience capacity issues in the future assessment year 2027 regardless of whether the school is expanded or not. The Transport Addendum suggests that capacity issues at this junction may even deter parents/guardians from driving to school supporting a mode shift in favour of active and sustainable travel. Whilst this may well have the desired impact Officers have been keen to remind the applicant that the school already contributes to congestion issues at this junction and whilst it is not solely liable the inclusion of an improvement works to alleviate some pressure from this area is necessary. As such a financial contribution has been added to the obligations.

The aforementioned increase in vehicle trips is not considered to be significant and the transport assessment provides details for how the increase in vehicle trips will be managed. The management methods proposed are common across school projects and in particular where a significant increase in pupil numbers are proposed which demonstrates that in most cases the methods are successful. One of these methods is the staggering of arrival times over a 30 minute period. The applicant has stated that Reception to Year 2 would arrive in the first 15 minutes followed by Years 3 to 6 in the last 15 minutes. Based on it taking just over 3 minutes to arrive and park, let the pupil out of the car and leave over the course of 30 minutes the 23 car parking spaces could accommodate up to 197 cars arriving. It should also be noted that the proposal for staggered start times includes the wider Guru Nanak Secondary School Academy and Primary (see below). As it is estimated that 140 cars would arrive just before the school day begins and it is noted that there would be ample parking spaces provided. The staggered start and finish times for the proposed primary school have been secured by planning condition. As the adjoining schools do not form part of the red line boundary, a legal obligation/Head of Term is proposed in order to secure a staggered start and finish time for all of the Guru Nanak Academy Trust schools in order to minimise the pressures on the local and strategic highways network.

In commenting on the application the GLA had raised a request for the review of whether a school bus could be implemented into the school travel plan as this could reduce the number of vehicle trips as well as having a positive impact on Air Quality. Although no specific data was submitted to demonstrate how successful the proposal for a school bus could be, the method of reducing trip numbers is supported by the Highway Authority and will be secured via the legal agreement.

Further contributions have been agreed pertaining to improvements to the roads linking to the proposed development in order to make walking and cycling both a safer and more attractive modes of transport. These improvements include measures to create an active travel zone around the school, including works to reduce road safety risk, encourage active travel and create a 'Healthy Streets' environment: Carriageway surfacing, shared use footpaths linking the subways at Minet Drive and Abbotswood Drive with the school and Springfield Road and installation of a 'School Keep Clear' markings CCTV camera to enforce illegal parking.

The proposal for a contribution to extension to the Santander bike scheme to a location near the school was considered and found to be unnecessary. It was decided that the focus in achieving the targets within the travel plan should be directed towards the use of the school bus and this was agreed by the councils Highway Officer.

The following contributions have been agreed:

- (1) £26,000 - Shared use footpaths linking the subways at Minet Drive and Abbotswood Drive with the school and Springfield Road.
- (2) £15,000 - Installation of a 'School Keep Clear' markings CCTV camera to enforce illegal parking.
- (3) £1,370.00 - Measures to create an active travel zone around the school, including works to reduce road safety risk, encourage active travel and create a 'Healthy Streets' environment: Traffic management.
- (4) £6,682.00 - Preliminary design works
- (5) £53,375.00 - Measures to create an active travel zone around the school, including works to reduce road safety risk, encourage active travel and create a 'Healthy Streets' environment: Carriageway surfacing.
- (6) £29,420.00 - Measures to create an active travel zone around the school, including works to reduce road safety risk, encourage active travel and create a 'Healthy Streets' environment: Footway & kerb.
- (7) £25,000.00 - Measures to create an active travel zone around the school, including works to reduce road safety risk, encourage active travel and create a 'Healthy Streets' environment: Street lighting.
- (8) £20,000 for Uxbridge Road/Springfield Road junction improvements.

In addition to the above the applicant has submitted a Construction Environmental Management Plan which has been assessed and found to be acceptable by the Councils Highway Officer. As such not construction management plan condition is necessary.

Taking the above into consideration the proposal is considered to comply with the necessary Highway Policies.

7.11 Urban design, access and security

- Urban Design

The proposed new building adopts a T shape design with the bulk of the building being orientated to face Beaconsfield Road. It is also noted that the building has shifted as far towards the Beaconsfield Road as possible in already to ensure that it close to the existing developed areas. The T shape block presents a functional design which is considered to minimise the impact to the Green Belt as well as being efficient and a cost effective building which can be delivered quickly by containing the majority of school facilities within a single building footprint. Whilst ideally size, scale and height of the buildings would be reduced, particularly given the site's Green Belt location, the applicant has demonstrated that a number of options have been explored in order to ensure that the proposed site layout limits, as much as is possible, the overall impact of the development on the Green Belt and it is accepted that the layout and designs proposed are a satisfactory compromise between delivering cost effective and much needed school facilities and overall visual impact.

Detailed proposals were submitted during pre-application discussions regarding the general site layout and the design of the building. It is clear that the design advice given at pre-application stage has been taken into consideration given that the design featured a

linear block which was considered to be undesirable has now changed and the bulk and mass of the building has been broken up due to the inclusion of stepped heights from 1-3 stories thus reducing the visual impact.

The elevational treatments comprise of brick as the primary building material and the removal of the render from the majority of the elevations is welcomed. The use of brick will also assist with establishing a relationship with the existing school buildings which bound site and add to the visual interest of the building through brick detailing in the form of banding and expressed brick courses and the introduction of decorative spandrel panels.

It is noted that the GLA do not consider the building to be of high-quality and more specifically the comments state;

"The design is not high-quality and does not demonstrate mitigation measures are utilised in relation to impact on the openness of a Green Belt site. Whilst the proposed internal layout is functional, massing and materiality do not recognisably acknowledge the site's Green Belt context. South facing classrooms have canopies as mitigation against overheating and to provide shading, which is welcomed. The main entrance block is located some way from the street entrance which is not ideal, and the scheme's car dominant design should be revisited. Car parking and waiting areas also dominate the public realm of the site in terms of area and proportions and it is not clear whether this is a permanent design approach or would be reduced over time. Further clarification is therefore required in this respect.

An informal landscape is proposed, with incidental planting which is welcomed. However, the applicant should consider incorporating formal soft standing play areas as the landscape strategy is currently dominated by wide areas of hardstanding. The proposed orchard planting is a positive move and could be expanded upon to run throughout the application site."

With regards to the above comments, consideration should be afforded to the Local Authorities parking standards and given the sites low PTAL rating (PTAL 0) there is a high dependency on the motor vehicle to access the site. This therefore dictates the level of parking required and depth in which the building needs to be set back from the main frontage. Furthermore, the applicant has undertaken a review of a number of control options which could accommodate a different design however retaining the majority of the building footprint within or as close to the existing temporary classrooms as possible was considered the best option for restricting the impact to the openness of the Green Belt and this is further compounded by the fact that this location was considered the most appropriate when granting consent for the temporary school. Furthermore a revised plan has indicated further fruit trees are to be planted within the front car parking / entrance area which will soften the view of the area which is dominated by hard surfacing.

The addition of green roofs appears minimal and restricted to the single storey roof at the southern end of the building. It is also felt that the larger expanses of plain brickwork to the elevations of the school would also benefit from the inclusion of green walls to help soften the development. However the applicant has stated that the cost involved with building the school is substantial and the inclusion of further green roofs and green walling could add have additional cost implications once implemented in order to ensure they are properly maintained therefore further works are not considered financially possible. In discussing the need to alleviate some of the concerns raised by the GLA regarding the impact to the Openness of the Green Belt a condition is to be added to ensure further work to review the

inclusion of further green roofs and walls is undertaken. In addition to this the agent has stated that a green trellis could be proposed to the rear elevations which would appear similar to a green wall and less costly for the school. This again will be reviewed during the submission of further details secured by condition.

It is noted that in commenting the proposal the Council's Urban Design Officer requested additional fencing details. These have been submitted within a revised set of landscaping drawings and these are considered acceptable. A condition has been added to ensure further material details are submitted and approved by the local planning authority prior to the commencement of above ground works.

- Security

The proposed development includes fencing to the Nanaskar Primary School perimeter will be 2.4m high. The car park will function as a non-secure area, with an efficient secure line enabling access for visitors to the main building entrance without entering the secured area.

Internal fencing locations have been carefully considered to minimise impact on movement while providing containment where required. Fencing height will vary depending on the use of the space. The security strategy has been reviewed and refined during the CEM process, to ensure that the zoning is effective with simple management processes. Cross-corridor doors with access control have been located to simply restrict access to the teaching wings, and the spatial arrangement minimises the number of doors requiring manual locking. The zoning layout includes significant access to fire escape routes and ensures an appropriate number of WCs are available to support large congregations using the space. Access to external areas is also provided within the out-of-hours use zone, allowing events to spill out into the landscape where appropriate. The external teaching spaces will have a 1.2m high fence to the surround and the MUGA will have a 3.0m fence to facilitate ball games

All proposed fencing will be visually permeable weldmesh fencing except to the bin store. The weldmesh fencing will be specified in a dark recessive colour in order to reduce its prominence, disappearing into the surround while providing a secure site.

The metropolitan police has assessed the proposal and stated that whilst the above details are welcomed the standard secure by design condition is necessary.

7.12 Disabled access

The submitted Design and Access Statement confirms that the proposed development will achieve reasonable levels of accessibility with level access provided throughout, appropriate signage, disability standard parking bays and provision of lifts.

It confirms that the development will comply with relevant educational design standards (BB98) and Part M of the building regulations.

Initially the Council's Access Officer has advised that a 'Changing Places' cubicle should be incorporated into the scheme to serve those with complex care needs. The accommodation provision within the Nanaksar Primary School proposals follows the strict Department for Education requirements. These are the result of many years' research and development by the Government, and establish benchmarks from which DfE-funded projects should not deviate. In particular, with respect to Hygiene Room provision, the DfE allowance is for an 8m² space which provides for disabled pupils' wash-down and toileting,

a ceiling-mounted hoist, with peninsular accessible wc and wash-hand basin, an accessible shower, plus space for shower-bed. Whilst this does not achieve the full Changing Places provision, the functionality is close, and the provision is considered by the DfE to be appropriate to Primary School use. It is therefore considered that the current size of the hygiene room is acceptable.

The Access Officer has stated the requirement for a fire evacuation plan to be submitted and this will be secured via an appropriate condition.

It is considered that, subject to conditions, acceptable levels of accessibility would be achieved across the development.

7.13 Provision of affordable & special needs housing

This section is not applicable to this type of development

7.14 Trees, landscaping and Ecology

TREES AND LANDSCAPING

The NPPF states that development proposals should seek to respect and retain, where possible, existing landforms and natural features of development sites, including trees of amenity value, hedges and other landscape features. It states that development should make suitable provision for high quality hard and soft landscape treatments around buildings.

Policy DMHB 14 of the Local Plan:Part Two (2020) notes all developments will be expected to retain or enhance the existing landscape, trees, biodiversity and natural features of merit. Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees.

The site lies within the area covered by TPO 722, which protects an oak (T1 on the schedule) in the north-east corner of the plot. Regionally the area falls within the National Landscape Character Area 115 (Thames Valley). The site also lies within the Green Belt whereby there is a presumption against development except in exceptional circumstances.

The application includes a number of new soft and hard landscaped areas as well formal and informal play space. As discussed in the Landscaping Officers comments there remains a small number of missed opportunities within the final design, most notably the inclusion of more green roofs/walls however it is noted that the applicant has agreed to a review of implementing a green trellis wall in order to further soften the impact to the openness of the Green Belt. The proposal includes a comprehensive and well thought landscaping layout which enhances the sense of place that will contribute to the children's well-being. The layout incorporates robust and attractive spaces which preserve and protect the TPO'd oak in the north-east corner of the site. Approximately 45 new trees will be planted to enhance the setting of the building and external spaces, together with an additional 17 trees in a new school orchard. This is welcomed as is the additional fruit trees to the frontage which assist with softening the area which is dominated by hard surfacing.

The proposed landscaping is considered to be acceptable.

ECOLOGY

In terms of ecological impacts, an Ecological Appraisal a Preliminary Ecological Assessment was carried out by Betts in December 2018. It was noted that the site is

dominated by amenity grassland used as a school sports field. There is some shrub planting along the northern boundary of the site where there is also one A3 tree. It was recommended that in order to increase the site's ecological value the applicant should consider implementing areas of longer vegetation to be enhanced with compost heaps and log piles to the north and bat and bird boxes. In response the proposed masterplan now includes a range of ecological enhancements which include;

- Bat and bird boxes
- Areas of longer vegetation to be retained along with the addition of a log pile to the north
- Native shrub buffer and hedgerow planting
- New tree planting
- Ornamental, flowering herbaceous plants

The application has been assessed by the Councils Ecology Officer who has stated that the use of Green Walls should be revisited and also a plan providing further detail for the above ecological enhancements is submitted.

FLOODLIGHTING

During the consultation with Sport England it was requested that the development and in particular the sports pitches to be made available outside of the school and within the community use agreement would benefit from additional floodlighting. Whilst this would enable the use of the facilities to be expanded particularly within the autumn and winter months this would compromise the protection of the wildlife habitat and preservation of the ecological corridor which abuts the southern boundary of the site. Furthermore the emphasis on creating an orchard or possible pond area is to create further ecological habitat which again would be compromised by the inclusion of further floodlighting. As such a condition restricting lighting to that only which is shown on the proposed plans has been attached.

7.15 Sustainable waste management

Policy 5.17 of the London Plan (2016) sets out the Mayors Spatial Policy for Waste Management including the requirements for new developments to provide appropriate facilities for the storage of refuse and recycling. The applicant has demonstrated the proposal would include a secure waste storage area within the proposed plan.

The design and access statement concludes that recycling areas will be incorporated both internally and externally. Waste will be collected and segregated in the building, and daily collections will be made to transport waste to the external waste and recycling store. This external compound is generously proportioned, to allow appropriate capacity for multiple bins providing flexibility for segregation of recycling streams on site as required. The bin store itself is located to the front of the western elevation and is segregated by the main building. The bin store would measure approximately 40 sqm and would be constructed of solid timber fencing to ensure the bin area remains discreet.

As stated above the layout of the bin area and car park prevents the bins being access within the appropriate distance from the vehicle stopping point. This results in the a drag distance in excess of 10 metres which will require a management condition to ensure that the bins can be moved on collection day to an area that is not in excess of the drag distance.

7.16 Renewable energy / Sustainability

Policy 5.2 of the London Plan (2016) requires developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

Be lean: use less energy
Be clean: supply energy efficiently
Be green: use renewable energy

Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will ensure that climate change mitigation is addressed at every stage of the development process. This includes the reduction of carbon emissions through low carbon strategies and encouraging the installation of renewable energy to meet the targets set by the London Plan (2016).

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that: A) All developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets; B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved; C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate at of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

The application is supported by an energy statement which outlines how the design will comply with the above policy. The detailed design helps to achieve a reduction of CO2 emissions by 2% as measured by the initial Part L assessment. This, together with the proposed PV provides a 73% reduction, with PVs providing a further 71% reduction beyond the "Be Lean" measures. When allowing for SAP10 emission factors, the total CO2 reduction drops 13.464 Tonnes CO2/year, though with the total building emissions also reduced through SAP10 factors, this still provides a total reduction of 46% through 'Be Lean' and 'Be Green' measures. Around 71% CO2 reduction is achieved from the inclusion of onsite renewable technologies in the form of photovoltaic panels on current carbon emission factors, which drops to 53% reduction over actual building and 46% reduction.

The Councils Sustainability Officer has stated that the energy saving methods are acceptable however further details pertaining to the location of the PV panels is required as well as how the energy saving targets will be monitored. These details will be secured via a suitably worded condition.

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.

Policy DMEI 10 of the Local Plan: Part Two (2020) applications for all new build developments are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy.

Following a review of the revised drainage strategy, the flood water management officer has removed their concerns to the application. The scheme is aiming for BREEAM Excellent in the water category by firstly, installing a BREEAM compliant leak detection system between the utility providers meter at the site boundary and the incoming main

meter at point of building entry in order to monitor below ground mains for leaks on site, to ensure a signal is present should any water leakage/wastage occur below ground on site. The GNSA ultimately felt that the operational and maintenance costs of a specialist green wall installation were not practical; and as a result the proposals incorporate a planted arrangement of pleached trees along the feature wall, establishing an element of 'green wall' visual impact without the associated maintenance requirements. The scheme does not specifically include measures to collect and reuse rain/grey water. However it does seek to minimise water consumption and thus be more water efficient

The application has been reviewed by the Councils Flood Water Management Officer who has stated that the details provided are acceptable and no further information is required. As such the proposal meets the flooding policies set out above.

7.18 Noise or Air Quality Issues

NOISE

Policy DMCI 1A of the Local Plan: Part Two (2020) requires new schools and school expansions to take into account the size of the site, its location and suitability to accommodate a new school or school expansion taking account of compatibility with surrounding uses, and existing planning policy designations.

The baseline survey details presented with the noise assessment are considered to be acceptable following the applicants confirmation that no industrial/commercial noise was found to be present during the survey. Furthermore the assessment relating to the impact the proposed development would have on noise levels to the surrounding areas has been found to be acceptable. The proposed glazing, ventilation and overheating strategy is considered suitable (on acoustic grounds). With regards to the control of noise and vibration throughout the construction process these details are included within the CEMP and are deemed to be acceptable.

AIR QUALITY

Policy DMEI 1 of the Local Plan: Part Two (2020) requires major development in Air Quality Management Areas to provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

The Local Plan recognises that living walls and roofs allow a number of environmental goals to be achieved in a relatively small space. They also remove particulates that improve local air quality. The Sustainability Officer has requested that a condition is added to the decision notice to ensure the proposal contributes to Air Quality enhancements.

Policy DMEI 14 of the Local Plan: Part Two (2020) requires development proposals to demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. Developments are expected to be:

- Air quality neutral;
- include mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors; and
- actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area.

The application site is located within the declared Air Quality Management Area and

approximately 460 m to the south of the Ossie Garvin Air Quality Focus Area. The proposal is for expansion of the school to accommodate additional pupils from 240 to 900 pupils along with 55 additional staff. The impacts of the school are felt beyond the site boundary in terms of the associated increases in road traffic from the school users accessing the site. Although the site itself is on the margins of an Air Quality Focus Area, the road in and out of the site connects directly, via a junction, to the Uxbridge Road which is within the Ossie Garvin Air Quality Focus Area. Air Quality Focus Areas are identified where the pollution levels are already elevated, there is relevant public exposure and where improvements in air quality are to be prioritised.

The Air Quality assessment includes a variety of analysis which are set out to ascertain whether or not the proposed development is air quality neutral. If the result is such that the air quality is not neutral the applicant would be expected to pay a damage cost to offset the lack of on site mitigation. The assessment provides a review of the junction located between Springfield Road and Uxbridge Road which as described in the Highways section of this report is a hotspot for congestion. The applicant states that Springfield Road will experience an increase of approximately 23% and an increase in traffic flows on the Uxbridge Road of approximately 12%. In assessing the scheme the Councils Air Quality Officer has stated that it is unclear whether committed developments along Springfield Road have been taken into account, therefore this could be an under-estimate. Notwithstanding this the document and transported related documents show the congestion issues around the junction would increase in future with or without the development and that the proposed congestion here could deter those who interact the school to shift to other modes of transport . As also stated in the highways section of this report this may well have the desired affect however it should be recognised that the school and wider Guru Nanak site contribute to this congestion and whilst not solely responsible appropriate levels of mitigation are required.

However the assessment accompanying the application concluded that the scheme was air quality neutral and therefore no mitigation was required. It is made clear within the Air Quality Officer's comments that this statement is not supported a more precautionary approach in terms of the assessment of air quality neutrality should have been taken. Notwithstanding the difference in the methodology used to assess whether the scheme is air quality neutral it is clear that the scheme presents an increase in vehicle trips in an area of very low access to public transport and in an area already recognised as pollution-sensitive therefore mitigation is required.

As such the Council requires the developer to provide a suitable mitigation strategy to allow the Council to be able to assess compliance with London Plan Policy 7.14, Local Plan Part 1 and Part 2 and the objectives of the Air Quality Action Plan.

The following mitigation methods have been agreed.

1 Whilst a Travel Plan will be provided it must be effective and be quantifiable in terms of reducing traffic. In addition to the mitigation sought to promote and enhance active travel, it is recommended that there is an additional requirement within the Travel Plan for a School Bus Service to be provided with quantifiable targets set for patronage and a quantified assessment of the reduction in the number of trips by private car. As the bus service will operate within an Air Quality Focus area consideration should be given for the associated vehicles to be low/zero emission technology.

2 The associated traffic from the development impacts upon an already congested junction in an Air Quality Focus Area. It is recommended that an appropriate additional highways

contribution is sought to enable an effective scheme for alleviating congestion at this junction.

3 As the school is itself a sensitive receptor in terms of air quality, the landscaping scheme and active travel zone should include the use of green infrastructure specifically designed to protect the pupils from exposure on the routes to and from school.

The above mitigation measures are considered to be satisfactory and given the proposed use of the development the Council has been forthcoming with attempts to ensure the appropriate mitigation is agreed and will be delivered rather than opting for a damage cost payment. It is noted that the Air Quality Officer has requested a condition pertaining to dust emissions throughout the construction phases however these details are included within the CEMP therefore this has been amended to a compliance condition.

7.19 Comments on Public Consultations

The public comments are addressed in the main body of this report.

7.20 Planning obligations

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) relates to securing planning obligations to supplement the provision recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and education facilities through planning obligations in conjunction with other development proposals. This policy is supported by more specific supplementary planning guidance.

Should the application be approved, a range of planning obligations would be sought to mitigate the impact of the development, in line with Policy DMCI 7 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

Relevant Officers have reviewed the proposal, as have other statutory consultees. The comments received indicate the need for the following contributions or planning obligations to mitigate the impact of the development.

1. A contribution to the sum of £176,847 to secure all necessary highway works including written agreement from the Local Planning Authority on the final proposed public realm improvements to the pedestrian environment which comprise:

(1) £26,000 - Shared use footpaths linking the subways at Minet Drive and Abbotswood Drive with the school and Springfield Road.

(2) £15,000 - Installation of a 'School Keep Clear' markings CCTV camera to enforce illegal parking.

(3) £1,370.00 - Measures to create an active travel zone around the school, including works to reduce road safety risk, encourage active travel and create a 'Healthy Streets' environment: Traffic management.

(4) £6,682.00 - Preliminary design works

(5) £53,375.00 - Measures to create an active travel zone around the school, including works to reduce road safety risk, encourage active travel and create a 'Healthy Streets' environment: Carriageway surfacing.

(6) £29,420.00 - Measures to create an active travel zone around the school, including works to reduce road safety risk, encourage active travel and create a 'Healthy Streets' environment: Footway & kerb.

(7) £25,000.00 - Measures to create an active travel zone around the school, including works to reduce road safety risk, encourage active travel and create a 'Healthy Streets' environment: Street lighting.

(8) £20,000 for Uxbridge Road/Springfield Road junction improvements.

2. The provision of a Green School Travel Plan: Prior to first occupation a full travel plan to be submitted to and approved in writing by the council. Thereafter, the Travel Plan is required to be reviewed at regular intervals to monitor its impact and, if required, it shall be updated and/or amended in order that its aims and objectives are achieved. Therefore, a travel plan review should be undertaken and submitted to the Local Planning Authority for approval at 25%, 50%, 75% and 100% occupation of pupils and staff. The Travel Plan shall demonstrate a commitment to the ongoing provision and expansion of the existing school bus service to cater for the growing number of pupils and also a commitment to the ongoing review of and provision of additional cycle parking provision should demand dictate. A Travel Plan bond in the sum of £20,000 is also to be secured.

3. Community Use Agreement: Prior to occupation of the development a Community Use Scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of hours of use, access to the grass pitches, all weather pitch, MUGA and sports hall (including WCs and changing rooms) by non-school users, management responsibilities and include a mechanism for review. The approved scheme shall be implemented upon commencement of use of the development.

4. Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered.

5. Carbon off-set contribution as required by an approved Energy Assessment

6. Staggered Start and finish times for the Guru Nanak Academy Trust Schools on Springfiled Road;

7. Project Management & Monitoring Contribution equal to 5% of the total cash contributions. Details shall be in accordance with the Council Planning Obligations Supplementary Planning Document 2014.

A Community Infrastructure Levy contribution would not be required for this development which seeks to provide an educational use.

7.21 Expediency of enforcement action

None

7.22 Other Issues

CONTAMINATED LAND

Policy DMEI 12 of the Local Plan: Part Two (2020) requires proposals for development on potentially contaminated sites to be accompanied by at least an initial study of the likely contaminants. Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

The application is supported by a ground investigation report which is split into two phases of investigation.

The Phase 1 Preliminary Risk Assessment (PRA) and Conceptual Site Model (CSM) identified the principal contaminants of concern as: Total petroleum hydrocarbons (TPH); Poly-cyclic aromatic hydrocarbons (PAH); Volatile organic compounds (VOC)

Polychlorinated Biphenyls (PCB); Metals; Asbestos containing materials (ACM) and Landfill Gas. Plausible contaminant linkages were also identified.

Following findings from each Phase 2 site investigation the revised conceptual site model and updated risk assessment indicate residual risks, associated with earlier identified contaminants of concern and plausible contaminant linkages, are reduced to low and very low risk in response to the proposed construction of extensive areas of hardstanding and cover system for landscaped areas at the site.

However, there is an exception which relates to the detected concentrations of hazardous ground gases, for which the probability of vertical and lateral migration of gas was assessed to represent a low to moderate risk. A technical appraisal of the ground gas regime has classified the site as Characteristic Situation 2 (CS2) in accordance with BS8485:2015. Therefore ground gas protection measures are required, and the LPA shall require the protection to be correctly specified, installed, verified and validated accordingly.

Section 9 (Conclusions and Recommendations) within the Delta-Simons report provides summary details dealing with impacts of the contamination issues on human health and controlled waters, with particular reference to: heavy metals; PAHs; petroleum hydrocarbons; ACMs and ground gases which have been identified within soils at the site. The section

The Geo-environmental details within the three submitted reports provide suitable and sufficient information in terms of meeting the requirements for Phase 1 and 2 works conducted at site.

However, as outlined in section 9.3 (Recommendations for Supplementary Work), a range of additional issues are identified; the LPA shall require all of those issues to be addressed in accordance with the reports' recommendation.

The Contaminated Land Officer commented on the application noting the applicant's reports were reviewed, however further details are required by condition. As such a condition is attached to the draft decision notice requiring further details to be submitted.

URBAN GREENING

Policy G5 of the Mayors London Plan (intended to publish) seeks to promote the Use of Urban Greening. The use of greening streets, buildings and other public spaces does more than change the look of these places. Roofs and walls covered in plants, street trees and small pocket parks in between buildings make the city a better place to live, work and invest. These green features act as part of London's green infrastructure network to help clean our air, reduce the risk of flooding and keep the city cool.

The policy states that development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping. Major development proposals within the Central Activities Zone should demonstrate how green infrastructure has been incorporated.

Policy DMHB 11 and DMHB 14 of the Hillingdon Local Plan : Part 2 - Development Management Policies (2020) both state the importance of development incorporating green infrastructure into the design.

With regard to this policy the proposed development would incorporate the planting of 45 trees, 13 of which would be fruit trees planted within the frontage. This accompanied by the various pockets of soft landscaping helps to break up what is predominantly an area dominated by hard standing. Furthermore tree planting is proposed to the rear of the building in addition to both informal and formal play space comprising of both soft and hard landscaping. Furthermore the school have committed to the delivery of an orchard which will provide a modest ecological area for the children to enjoy.

The application proposes one green roof and whilst it is disappointing that further green roofs or walling have not been brought forward following pre-application discussions a condition for a further review of green infrastructure options has been included. Furthermore a condition for the use of pollution absorbent planting to be considered has also been included. This condition also includes specific wording related to the submission of an urban greening factor assessment.

FIRE SAFETY

In accordance with Policy D12 'Fire safety' of the Mayor's Intend to Publish London Plan, all major development proposals should be submitted with a Fire Safety Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

The policy states :

A. In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:

1. are designed to incorporate appropriate features which reduce the risk to life in the event of a fire
2. are constructed in an appropriate way to minimise the risk of fire spread
3. provide suitable and convenient means of escape for all building users
4. adopt a robust strategy for evacuation which all building users can have confidence in
5. provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

B. All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor. The statement should detail how the development proposal will function in terms of:

1. the building's construction: methods, products and materials used
2. the means of escape for all building users: stair cores, escape for building users who are disabled or require level access, and the associated management plan approach
3. 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
4. how provision will be made within the site to enable fire appliances to gain access to the building.

The application is supported by a Fire Safety Strategy which has been provided by a suitable fire safety assessor. The strategy has been reviewed by the Councils Building Control Team who have stated that the document provided is sufficient to adhere to the policy however a suitably worded condition has been included to ensure the development complies with the details within the Fire Safety Strategy.

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 application proposes the demolition of the existing temporary huts which accommodate the existing primary school pupils. There is significant policy support at all levels within the policy hierarchy which seek to encourage the expansion of educational facilities providing there is a evident need. Whilst the application presents a departure from National Policy in terms of its development within the Green Belt, the benefits and need for the development are considered to outweigh the harm to openness of the Green Belt. The applicant has provided sufficient information to justify the need and this is compounded by the response from the Councils Schools Placement Manager. Furthermore the sequential test is recognised as robust and the GLA have agreed that the proposal does meet more than one of the "very special circumstances" set out in the NPPF.

The applicant has sufficiently demonstrated that there will be no overall loss in the quality of sports provision by providing play spaces AWP MUGA's, and indoor provision by way of the hall which would be available to the public to use outside of school hours. Notwithstanding Sport England's objection, the educational need and the alternative sport provision outweighs the loss of the playing field.

It is not considered that the proposed development would result in an unacceptable impact on the visual amenities of the school site or on the surrounding area. The proposal would not have any significant detrimental impact on the amenities of the occupiers of neighbouring residential properties and it is not considered that the development would lead to such a significant increase in traffic and parking demand that refusal could be justified on highway grounds.

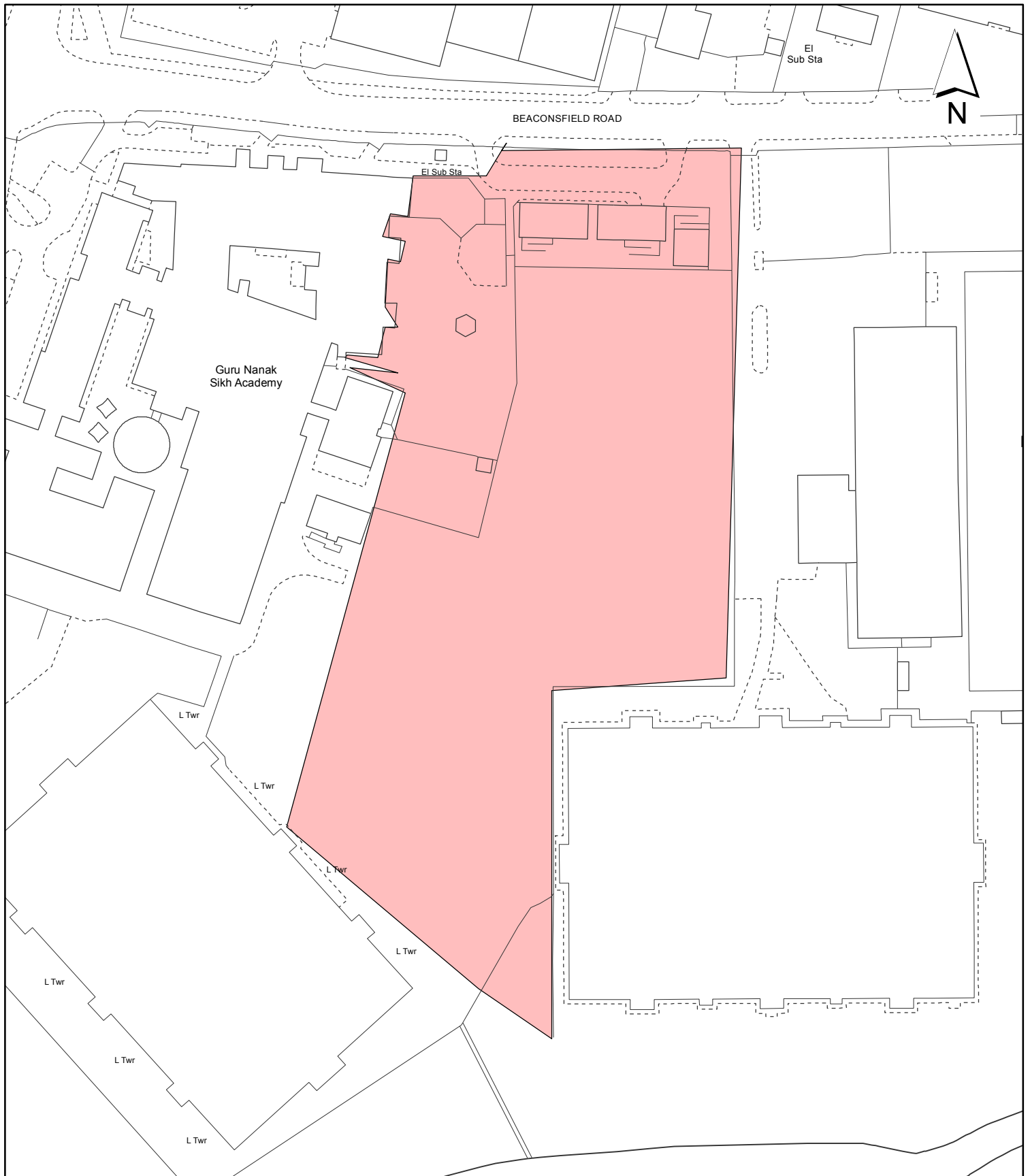
Accordingly, approval is recommended, subject to referral of the scheme to the Secretary of State and the GLA.

11. Reference Documents

Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)
Hillingdon Local Plan: Part 2 Site Allocations and Designations (2020)
Hillingdon Local Plan: Part 2 Development Management Policies (2020)
Hillingdon Local Plan: Policies Map (2020)
London Plan (March 2016)
London Plan (Intend to publish draft) 2019
National Planning Policy Framework (2019)
Policy Statement - Planning for Schools Development (DCLG, 15/08/11)
Council's Supplementary Planning Document - Planning Obligations (2014)

Contact Officer: Christopher Brady

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Notes:

 Site boundary

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Site Address: **Land adjoining
 Guru Nanak Sikh Academy
 Springfield Road
 Hayes**

Planning Application Ref:
4450/APP/2020/515

Planning Committee:
Major

Scale:
1:1,350

Date:
June 2020

**LONDON BOROUGH
 OF HILLINGDON**
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