

Item No.	Report of the Head of Planning, Transportation and Regeneration
Address	LAND EAST OF BROADMEAD ROAD & SOUTH OF ARCON WAY BROADMEAD ROAD NORTHOLT
Development:	Construction of a new single storey 80 Place SEND School together with associated landscaping, play areas, boundary treatments and car parking.
LBH Ref Nos:	71486/APP/2020/1369
Drawing Nos:	<p>Agricultural Survey Report, November 2019</p> <p>BRUKL Output Document (with Hybrid HP)</p> <p>BRUKL Output Document (No PV)</p> <p>Phase II - Supplementary Ground Investigation</p> <p>Extended Phase 1 Habitat Survey Report, Version 2, November 2019</p> <p>Landscape Proposals, Design and Access Statement v03, dated 30 March 2020</p> <p>Archaeological Desk Based Assessment</p> <p>Transport Assessment</p> <p>Ground Investigation Report, July 2018</p> <p>Air Quality Assessment</p> <p>190506-RGL-ZZ-00-DR-E-73-0001, Rev. S2-P02 (Lighting Plan)</p> <p>BREEAM New Construction 2018 Pre-assessment Report</p> <p>Sunlight / Daylight / Overshadowing Report</p> <p>Fire Strategy Summary</p> <p>Statement of Community Involvement, March 2020</p> <p>Montagu Evans Covering Letter dated 15/4/20</p> <p>Low / Zero Carbon (LZC) Report</p> <p>2045_L-00-01</p> <p>Topographical Survey Plan</p> <p>2045_L-01-01</p> <p>2045_A-01-00</p> <p>2045_A-01-01</p> <p>2045_A-02-01</p> <p>2045_A-02-02</p> <p>2045_A-02-03</p> <p>2045_A-03-01</p> <p>2045_A-09-01</p> <p>2045_A-09-02</p> <p>Planning Statement</p> <p>Sequential Site Assessment, April 2020</p> <p>2045_L-01-02</p> <p>Travel Plan, April 2020</p> <p>Delivery and Servicing Strategy</p> <p>Parking Management Plan</p> <p>Agent's email dated 10/7/20</p> <p>Sustainable Drainage Report</p> <p>Design and Access Statement, April 2020</p> <p>Urban Greening Factor Table</p> <p>GUV-COL-00-XX-DR-L-1000 Rev. 11</p> <p>Agent's email dated 30/7/20</p> <p>Agent's email dated 27/7/20</p>

Verified Views - Existing
Addendum Transport Technical Note, dated 24/7/20
Montague Evans Letter dated 30/7/20

Date Plans Recieved: 29/04/2020 **Date(s) of Amendment(s):**
Date Application Valid: 30/04/2020

1. **SUMMARY**

The proposal seeks full planning permission for the erection of a new Special Education Needs and Disability (SEND) school, with places for 80 pupils, together with associated landscaping, play areas, boundary treatments and car parking to occupy an irregularly shaped plot located on the south easterern side of Broadmead Road, at its junction with Ballinger Way within the Green Belt, close to the boundary with LB of Ealing.

The school site itself will occupy an area of approximately 0.47 hectares. The proposal would encompass the provision of hard and soft playspace for the children, extensive landscaping works and the provision of associated car parking. A drop off/pick up area would also be provided.

The GLA and the Council's Education Services have confirmed that there is a need for new SEND provision, particularly in the south of the borough as the only other specialist school is in the north of the borough.

The proposal would represent inappropriate development within the Green Belt and result in the loss of a portion of open space. However, the increased demand for SEND provision is compelling and well evidenced and it has been demonstrated that there are no alternative sites which could reasonably be utilised to meet this need.

This educational need represents very special circumstances and on balance this need outweighs the harm which would arise from the development in other respects, including through loss of open space by reason of inappropriateness.

The proposed development would be subject to extensive landscaping, including new tree planting, has been designed in order to minimise the use of land and minimise its impact on the openness of the green belt, including incorporation of a green roof on the side of the building facing the remaining Green Belt land. It is considered that having established the need for the facility, the design of the development, so far as is possible, minimises the impacts of the development and would sit comfortably within its surrounding context.

In relation to ecology, although an Extended Phase 1 Habitat Survey Report has been submitted, a more detailed survey is required to establish the presence or otherwise of protected species on site, most notably reptiles which is being undertaken. However, due to the pressing need for the new school and possible funding implications of delay in issuing the Council's decision, although not ideal, it is recommended that a condition is imposed to ensure that the survey(s) is provided prior to the commencement of works on

site, together with a requirement within the S106 for biodiversity offsetting if this is required.

The proposal is supported by a detailed Transport Assessment and following further assessment carried out by the applicant, the Council's Highways Engineers conclude that the proposed development would be acceptable in terms of traffic impact, pedestrian and highway safety.

The school is well separated from surrounding residential properties and subject to appropriate conditions it would have no unacceptable impacts on the amenity of neighbouring residential occupiers by way of dominance, loss of light, loss of privacy or noise.

The development has also been designed to fully accord with all requirements relating to accessible design, sustainable design and flood risk.

In conclusion, very special circumstances exist that outweigh the harm which would arise from the development in other respects, including through loss of open space by reason of inappropriateness. Having regard to this educational need, the development has been well designed to minimise its impacts and would comply with all other relevant planning policies.

The application is recommended for approval, subject to the appropriate referrals to the Greater London Authority and the Secretary of State.

2. RECOMMENDATION

That delegated powers be given to 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 as a departure from the provisions of the Development Plan, in accordance with paragraph 3 of the Town and Country Planning (Development Plan and Consultations) (Departures) Directions 1999;

B) That the application is referred to the Mayor of London for their Stage 2 referral;

C) That the Council enter into a legal agreement with the applicant under Section 106/Deed of Variation of the Town and Country Planning Act 1990 (as amended) to secure the following additional Heads of Terms (all original Heads of Terms to be retained as per original planning permission):

i) Highways: S278/S38 agreement to secure highway works to include a new formal pedestrian crossing that aligns with the proposed pedestrian entrance on Broadmead Road,

ii) Travel Plan (that requires the school to work with Hillingdon Council's School Travel and Road Safety team on an ongoing basis to work towards the TFL Travel Plan accreditation) and £20,000 bond,

iii) Biodiversity offsetting, if required,

iv) Construction Training: either a contribution equal to the formula (£2,500 for every £1m build + coordinator costs) or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development with the preference being for an in-kind scheme to be delivered,

v) Project Management & Monitoring Fee: a contribution equal to 5% of the total cash contributions secured from the scheme to enable the management and monitoring of the resulting agreement.

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

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

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

'The applicant has failed to provide measures to mitigate the impacts of the development through enhancements to services and the environment necessary as a consequence of demands created by the proposed development (in respect of highways, travel plan, community use of school facilities, biodiversity offsetting (if required), construction training). The proposal therefore conflicts with Policies DMEI 7, DMCI 3, DMT 1, DMT 2 and DMCI 7 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) and the Council's Planning Obligations SPD and the London Plan (2016).'

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

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:-

2045_L-01-01

2045_A-01-00

2045_A-01-01

2045_A-02-01

2045_A-02-02

2045_A-02-03

2045_A-03-01

190506-RGL-ZZ-00-DR-E-73-0001, Rev. S2-P02 (Lighting Plan)

GUV-COL-00-XX-DR-L-1000 Rev. 11 (Landscape Masterplan)

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:

Design and Access Statement, April 2020
BRUKL Output Document (with Hybrid HP)
BRUKL Output Document (No PV)
Phase II - Supplementary Ground Investigation
Extended Phase 1 Habitat Survey Report, Version 2, November 2019
Landscape Proposals, Design and Access Statement v03, dated 30 March 2020
Archaeological Desk Based Assessment
Ground Investigation Report, July 2018
Air Quality Assessment
BREEAM New Construction 2018 Pre-assessment Report
Sunlight / Daylight / Overshadowing Report
Fire Strategy Summary
Montagu Evans Covering Letter dated 15/4/20
Low / Zero Carbon (LZC) Report
Planning Statement
Agricultural Survey Report, November 2019
Sequential Site Assessment, April 2020
Transport Assessment
Addendum Transport Technical Note, dated 24/7/20
Delivery and Servicing Strategy
Parking Management Plan
Sustainable Drainage Report

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

REASON

To ensure that the development complies with the objectives of Policies DMHB 11, 12 and 14, DMEI 1, 2, 3, 4, 7, 9, 10 and 14 and DMT 1, 5 and 6 of the Hillingdon Local Plan Part 2 (2020)

4 NONSC Pupil Numbers

The development hereby approved shall not increase the number of pupils beyond the proposed 80 pupils and 60 staff (Full Time Equivalent) at any time.

REASON

To prevent the generation of additional traffic that could give rise to problems of safety and congestion on the surrounding roads, in compliance with Policy DMT1, DMT 2 and DMT6 of the adopted Hillingdon Local Plan : Part 2 - Development Management Policies (2020).

5 COM6 Levels

No development shall take place until plans of the site showing the existing and proposed ground levels and the proposed finished floor levels of all proposed buildings have been submitted to and approved in writing by the Local Planning Authority. Such levels shall be shown in relation to a fixed and known datum point. Thereafter the development shall not be carried out other than in accordance with the approved details.

REASON

To ensure that the development relates satisfactorily to adjoining properties in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

6 COM7 Materials (Submission)

No development shall take place until details of all materials and external surfaces, including details of the windows, doors, railings and roof weathering details and covered walkways, have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

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).

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

No development 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,
- 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 (to include 8 long-stay spaces and 2 short-stay spaces and further cycle parking should be provided for pupils who live very local to the school and may wish to cycle to school)
- 2.c Means of enclosure/boundary treatments
- 2.d Car Parking Layouts (including 4 accessibility parking spaces and demonstration that 10 car parking spaces are served by active electrical charging points with the remaining 34 spaces having passive provision)
- 2.e Hard Surfacing Materials
- 2.f Full details of external lighting, including height of lampposts and height of wall mounted lights,
- 2.g Other structures (such as play equipment and furniture)

3. Living Walls and Roofs

- 3.a Details of the inclusion of living walls and roofs
- 3.b Justification as to why no part of the development can include living walls and roofs

4. Details of Landscape Maintenance

- 4.a Landscape Maintenance Schedule for a minimum period of 5 years.
- 4.b Proposals for the replacement of any tree, shrub, or area of surfacing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

5. Schedule for Implementation

6. Other

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

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, DMT 5 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).

8 NONSC Details of refuse / cycle storage

Prior to the commencement of development, full details of the siting, design, materials and screening of the refuse storage area and cycle parking facilities shall be submitted to and approved in writing by the Local Planning Authority.

The cycle parking should be laid out in accordance with the London Cycling Design Standards (LCDS) and cater for larger cycles, including adapted cycles for disabled people.

Reason:

To ensure that appropriate facilities are provided, in accordance with Policies 6.9 and 7.2 of the London Plan, Policy T5 of the London Plan (Intend to Publish 2019), Policies DMHB 12 and DMT 5 of the Hillingdon Local Plan: Part Two - Development management Policies (January 2020).

9 NONSC Pedestrian Routes

Prior to the commencement of development, notwithstanding the details shown on the proposed site plan, details of delineated pedestrian routes linking the car parking spaces to the main entrance of the building shall be submitted to and approved in writing with the Local Planning Authority.

The routes shall be provided prior to the school being brought into use and thereafter maintained for so long as the development remains in existence.

Reason:

To ensure that safe pedestrian access is provided, in accordance with Policy 6.10 of the London Plan (March 2016) and Policy DMT 5 of the of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

10 NONSC CEMP

Before the development hereby approved commences, a Construction Environmental Management Plan (CEMP) shall be submitted to, and approved in writing by, the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. The CEMP shall comprise such combination of measures for controlling the effects of demolition, construction and enabling works associated with the development as may be approved by the Local Planning Authority. The CEMP shall address issues including the phasing of the works, hours of work, noise and vibration, air quality, waste management, site remediation, plant and equipment, site transportation and traffic management including routing, signage, permitted hours for construction traffic and construction materials deliveries. Such a strategy shall also include the details of cranes and other tall construction equipment (including the details of obstacle lighting). It will ensure appropriate communication with, the distribution of information to, the local community and the Local Planning Authority relating to relevant aspects of construction. Appropriate arrangement should be made for monitoring and responding to complaints relating to demolition and construction. All demolition, construction and enabling work at the development shall be carried out in accordance with the approved CEMP unless otherwise agreed in writing by the LPA.

REASON

To safeguard the amenity of surrounding areas and to ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policy 7.14 of the London Plan (March 2016).

11 COM15 Sustainable Water Management

No development approved by this permission shall be commenced until a scheme for the provision of sustainable water management has been submitted to and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate that sustainable drainage systems (SUDS) have been incorporated into the designs of the development in accordance with the hierarchy set out in accordance with Policy 5.15 of the London Plan and will:

- i. provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site to a greenfield run off rate which does not exceed 1.4l/s and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;
- ii. include a timetable for its implementation; and
- iii. provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The scheme shall also demonstrate the use of methods to minimise the use of potable water through water collection, reuse and recycling and will:

- iv. provide details of water collection facilities to capture excess rainwater;
- v. provide details of how rain and grey water will be recycled and reused in the development.

Thereafter the development shall proceed in accordance with the approved scheme.

REASON

To ensure the development does not increase the risk of flooding in accordance with Policy DME1 10 of the Hillingdon Local Plan Part 2 (2020) and Policies 5.13 and 5.15 of the London Plan (2016).

12 NONSC Energy

Prior to commencement of development an Energy Assessment for the school hereby approved shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall set out the annual baseline regulated energy demand (kwhr) as per 2013 Building Regulations (or subsequent amendments) and associated carbon emissions (kgCO₂ and tCO₂). The assessment shall then set out the measures and technology required to achieve a 35% reduction (zero carbon) in the CO₂ associated with the baseline regulated energy demand; these measures must be sufficiently evidenced with corresponding details and specifications including the location of low and zero carbon technology (i.e. roof plans showing the inclusion of PV panels). The updated Energy Assessment must clearly set out any shortfall (tCO₂) of the zero carbon standard. The development must proceed in accordance with the approved updated Energy Assessment.

REASON

To ensure the proposals contribute to a reduction in CO₂ in accordance with London Plan Policy 5.2 (2016).

13 NONSC Condition Air Quality - Low Emission Strategy

No development shall commence until a low emission strategy (LES) has been submitted to and approved in writing by the Local Planning Authority. The LES shall specify ways to manage air pollution emissions to conform with the following:-

- 1) No idling on school grounds or ways of access to the school entrance;
- 2) Implementation of suitable measures from the Mayor of London's Schools Air Quality Audit Toolkit demonstrating a clear steer towards an air quality positive approach and demonstrate the project's commitment to ensuring a high level of sustainability. The measures are to include but not be restricted to the provision of 10 electric vehicle charging points, as well as behavioural measures such as walking, car sharing, cycling and anti-idling campaigns, and the provision of green roofs and planting. The strategy shall detail the steps that will be followed in delivering the emission reduction/mitigation measures listed a plan indicating when this measures will be implemented. Measures will be updated in agreement with the local planning authority as needed;
- 3) a clear and effective strategy to encourage staff and pupils of the school to:-
 - a) use public transport;
 - b) cycle / walk to work where practicable;
 - c) enter car share schemes;
 - d) purchase and drive to work zero emission vehicles.

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

REASON:

As the application site is within an Air Quality Management Area and to reduce the impact on air quality in accordance with policy EM8 of the Local Plan: Part 1 (November 2012), policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), London Plan Policy 7.14, Mayor's Intent to Publish London Plan Policy SI1, and paragraph 170 of the National Planning Policy Framework (2019).

14 NONSC Control of Dust and Emissions Plan

No development shall commence until a Control of Dust and Emissions 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).

15 NONSC Non-road mobile machinery

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 4.2.3.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:

To ensure compliance with the London's Low Emission Zone for non-road mobile

machinery as per requirements of the London Environment Strategy, in accordance with Policy 7.14 of the London Plan (March 2016).

16 NONSC External Lighting Operation

The external lighting shall be controlled by appropriate movement sensors and shall not be operational outside of the school's use or any community use made of the school premises, except in the case of an emergency.

Reason:

To ensure that the amenity of surrounding residents are safeguarded and in order to protect biodiversity in accordance with Policies DMHB 11 and DMEI 7 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

17 NONSC Community Use Agreement

Prior to the occupation of the development, a Community Use Agreement, prepared in consultation with Sport England, shall be submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement shall be provided to the Local Planning Authority. The agreement shall apply to the School Hall and Hydrotherapy Pool and any other appropriate facilities and include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review and the hours of use of the external lighting. The development shall not be used otherwise 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 and to accord with Policy 3.19 of the London Plan (March 2016).

18 NONSC Ground Gas Mitigation

The development shall not commence until a scheme to deal with identified ground gas issues has been submitted to and approved by the Local Planning Authority (LPA). All works which form part of the required remedial measures shall be completed before any part of the development is occupied or brought into use unless the 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) A written method statement shall be required to provide details of the proposed gas protection measures, including validation of the same. The method statement will also identify how completion of the works will be verified. The information shall also include proposals for a watching brief to address any undiscovered contamination. All shall be agreed in writing with the LPA prior to commencement, and no deviation shall be made from the proposed schemes without the express agreement of the LPA prior to its implementation.

(ii) If during remedial or other development works contamination not addressed in the submitted details is identified, then an addendum to the proposed methodology/remedial scheme shall be agreed with the LPA prior to implementation; and

(iii) Upon completion of the approved 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 installed protective measure/s and their verification to show that the works have been carried out in full and in strict accordance with the approved methodology.

REASON

The Council is aware of the presence of land, situated on and in proximity to the subject site, with the potential to emit gas. It is expected the installed gas protection measures will ensure that risks from gas migration to the future users of the property are minimised

19 NONSC Contaminated Soil / Material Importation

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. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority.

REASON

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

20 NONSC Fire Strategy

Prior to the commencement of works on site, a detailed Fire Strategy Statement shall be submitted to and approved in writing by the Local Planning Authority and shall be implemented on site. Thereafter the development shall not be carried out other than in strict accordance with the approved details.

REASON

To ensure that the development meets Fire Safety Standards in accordance with policy D12 of the draft London Plan (Intend to Publish version 2019).

21 NONSC Reptile Survey

Prior to the commencement of works on site, details of a reptile survey / report to identify the presence or otherwise of any protected species on or close to the site shall be agreed with the Local Planning Authority and be carried out by a licensed ecologist and the results, together with the need for any mitigation measures shall be submitted to and approved in writing by the Local Planning Authority.

The development shall be carried out in strict accordance with the survey / report.

Reason:

To ensure that the development does not harm any protected species in accordance with Policy DMEI 7 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

22 NONSC Ecology Enhancement Scheme

Prior to the commencement of development a scheme for the protection, creation of biodiversity features and enhancement of opportunities for wildlife shall be submitted to and approved in writing by the Local Planning Authority. The plans shall detail measures to promote, encourage and support wildlife through the use of, but not limited to, bat and bird boxes, specific wildlife areas within the landscape schemes and the inclusion of living walls/screens and living roofs. The scheme shall also incorporate plans showing a suitable transition from the development site to the river (incorporating the river bank) that promotes and supports appropriate wildlife. The development must proceed in accordance with the approved plans.

REASON

To ensure the development makes a positive contribution to the protection and enhancement of flora and fauna in an urban setting in accordance with Policy DMEI 7 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

23 COM31 Secured by Design

The building and car park hereby approved shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No building 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 excising 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 Hillingdon Local Plan Part 2 policy DMHB 15 and London Plan (2016) Policies 7.1 and 7.3.

24 NONSC Non Standard Condition

Prior to commencement of development, a full and detailed Construction Logistics Plan shall be submitted to and approved in writing by the Local Planning Authority.

This should be in accordance with Transport for London's Construction Logistic Planning Guidance and detail the management of construction traffic, including vehicle types, frequency of visits, expected daily time frames, use of an onsite banksman, on-site loading/unloading arrangements and parking of site operative vehicles.

The construction works shall be carried out in strict accordance with the approved plan.

REASON

To ensure that the construction works include appropriate efficiency and sustainability measures so as not to compromise the safe and efficient operation of the local highway network and minimizes emissions, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policy 7.14 of the London Plan (March 2016).

25 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.

INFORMATIVES

1 152 **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).

2 153 **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.

NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 8	NPPF-8 2018 - Promoting healthy and safe communities
NPPF- 9	NPPF-9 2018 - Promoting sustainable transport
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
LPP 1.1	(2016) Delivering the strategic vision and objectives for London
LPP 2.18	(2016) Green Infrastructure: the multi functional network of open and green spaces
LPP 3.1	(2016) Ensuring equal life chances for all
LPP 3.2	(2016) Improving health and addressing health inequalities
LPP 3.18	(2016) Education Facilities
LPP 3.19	(2016) Sports Facilities
LPP 4.12	(2016) Improving opportunities for all
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.3	(2016) Sustainable design and construction
LPP 5.6	(2016) Decentralised Energy in Development Proposals
LPP 5.7	(2016) Renewable energy
LPP 5.9	(2016) Overheating and cooling
LPP 5.10	(2016) Urban Greening
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.17	(2016) Waste capacity

LPP 5.21	(2016) Contaminated land
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.5	(2016) Funding Crossrail and other strategically important transport infrastructure
LPP 6.9	(2016) Cycling
LPP 6.10	(2016) Walking
LPP 6.13	(2016) Parking
LPP 7.1	(2016) Lifetime Neighbourhoods
LPP 7.2	(2016) An inclusive environment
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.6	(2016) Architecture
LPP 7.13	(2016) Safety, security and resilience to emergency
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 7.16	(2016) Green Belt
LPP 7.18	(2016) Protecting open space and addressing deficiency
LPP 7.19	(2016) Biodiversity and access to nature
LPP 7.21	(2016) Trees and woodlands
LPP 8.2	(2016) Planning obligations
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 5	Development in Green Chains
DMEI 7	Biodiversity Protection and Enhancement
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 13	Importation of Material
DMEI 14	Air Quality
DMCI 1A	Development of New Education Floorspace
DMCI 3	Public Open Space Provision
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LDF-AH	Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010

3 170 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.

4 173 Community Infrastructure Levy (CIL) (Granting Consent)

Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), this development is liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This will be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012. Before commencement of works the development parties must notify the London Borough of Hillingdon of the commencement date for the construction works (by submitting a Commencement Notice) and assume liability to pay CIL (by submitting an Assumption of Liability Notice) to the Council at planning@hillingsdon.gov.uk. The Council will then issue a Demand Notice setting out the date and the amount of CIL that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed.

The above forms can be found on the planning portal at: www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

Pre-Commencement Conditions: These conditions are important from a CIL liability perspective as a scheme will not become CIL liable until all of the pre-commencement conditions have been discharged/complied with.

5

As regards the requirement for a final Travel Plan within the Heads of Terms for the S106 Agreement, this should include the following:-

The Council's Highway Engineer advises that the Travel Plan should include targets for reducing the number of pupils being driven to school alone in a private car and should set out a series of robust measures that when implemented will achieve these targets. The Travel Plan should also include details regarding how the Travel Plan will be monitored and set out the actions that would be taken in the event of these targets not being met. To the list of measure that will be implemented the applicant should add a commitment that the Travel Plan Coordinator will make staff aware of the adult cycle training offered by LB Hillingdon, provide information on local cycling routes and work with the whole school community to provide personalised travel planning advice. The site must display public transport information in real time at the reception/foyer to encourage public transport use. The Highway Authority also requires that the Travel Plan Coordinator engages with partners to explore new ideas to help deliver genuine alternatives to travelling to the site by private car.

TfL advise that it should set out the conditions of how car parking could be re-provided as cycle storage in the future,

6

Sport England advise that they would welcome the facilities being available for community use outside school hours and that any community use should be secured through a Community Use Agreement (a template is available on Sport England's website).

7

The British Gymnastic Organisation advise that as a SEND school, the applicant should

contact them for advice on provision and delivery of programmes for SEND pupils and also the scope for community use.

3. CONSIDERATIONS

3.1 Site and Locality

The site forms a 0.47ha area of open land and its former site entrance on the south eastern side of Broadmead Road, at its junction with Ballinger Way, on the eastern side of the borough, close to the borough boundary with the London Borough of Ealing. The site forms the north western edge of an area of public open space which extends to the south east towards the Grand Union Canal. The site is relatively flat and comprises areas of mown and rough grassland with a number of self-set trees, although there is a 5m to 7m high bund / spoil mound which crosses the site at its southern end. A two metre high hoarding has been erected around the front of the site.

The site is adjoined to the north east, north west and south east by housing. On the opposite side of Broadmead Road, the area comprises mainly small scale, two storey brick and tiled terraced houses, arranged in tight grained, intricate developments of angled groups and cul-de-sacs, with landscaping softening the high density. Adjoining the site to the south west is a footpath which passes through a green corridor including mature trees which leads to the parks and open spaces to the south and east. Beyond the footpath, there are groups of small houses. On the opposite side of Ballinger Way to the north east, there are three, modest sized, flatted blocks which look out onto the open space of the application site.

The E6 bus route passes the site and there are a number of bus stops adjoining the site, with additional services on Ruislip Road, some 540m to the north of the site.

The site forms part of the Metropolitan Green Belt and has a Public Transport Accessibility Level of 2, on a scale of 1 to 6, where 1 represents the lowest level of public transport accessibility. The footpath adjoining the site to the south west and land to the south form a Nature Conservation Site Grade I Yeading Brook & Minet Country Park.

3.2 Proposed Scheme

The proposal is for a single storey 2,410 sq.m. (GIA) Special Education Needs and Disability (SEND) school, with places for 80 pupils, together with associated landscaping, play areas, boundary treatments and car parking.

It is proposed that the school would be a specialist SEND school, where approximately 85% of the pupils would have severe learning difficulties, many of whom will also have autism spectrum conditions, with the remaining 15% having profound and multiple learning difficulties.

The new school would comprise a range of cellular and open-plan learning spaces, small group and quiet rooms, therapy rooms, a main hall, a hydrotherapy suite and a range of staff facilities. These would be laid out in three "stimulus zones" to create spaces to accommodate the range of needs of the pupils within the school. A roughly W-shaped low-stimulus zone comprising mainly of classrooms would be to the south east of the site, next to which would be a low to medium stimulus zone, comprising mainly open plan spaces. To the north west of the site, next to Broadmead Road and Arcon Drive would be a high-stimulus zone, comprising staff offices and the school reception as well as sensory, hydrotherapy and therapy spaces.

Externally, there would be an area of car parking to the west along Broadmead Road, which would be accessed via a covered walkway, as well as a horticultural and multi-sensory space. Two courtyards would be provided between the high and medium stimulus zones. A flexible activity space, playgrounds and playing fields would be provided to the south and east of the site, next to the remainder of the Green Belt. On this side of the building, it would have a sloping green roof facing the remaining Green Belt.

Vehicle access into the site would be one-way with the entrance from Ballinger Way approximately 15 metres back from the junction with Broadmead Road with the exit onto Broadmead Road.

The proposal would provide 44 car parking spaces of which two would be wheelchair accessible and 10 would have electric charging points. There would be a further 2 minibus parking spaces and a 60 metre drop off and pick up layby which would be able to accommodate 9 minibuses. Thirty two car parking spaces would be reserved for staff and 10 available for visitors, parents and taxis. Eight cycle parking spaces would be provided as well as 2 motorcycle parking spaces. With the exception of waste collection all servicing would take place within the school site. The waste collection would take place on street by wheeling the bins from the waste store located adjacent to the northern boundary Arcon Drive.

There would be 2.4m high security fence surrounding the site. This would be set back from the frontage on Broadmead Road with landscaping provided both in front and behind the fence.

3.3 Relevant Planning History

Comment on Relevant Planning History

This site formed part of the much larger Grand Union Village site that straddled Hillingdon and Ealing Boroughs which was granted permission on 17/05/02 for its phased redevelopment and part refurbishment to provide a mixed use development comprising residential, office, industrial, commercial, retail, community and health facilities, leisure/sports complex and recreational space (App. No. 327/APP/2000/2106 refers). That part of the approved scheme which was proposed for this site was the leisure/sports centre.

A reserved matters application (App. No. 327/APP/2003/990 refers) for a 4,945 sq. m leisure complex was refused on 30/1/04 on grounds of the amount of car parking proposed would prejudice the openness and visual amenities of the Green Belt; the provision of on-site car parking exceeded the Council's standards and the proposal failed to provide sufficient covered and secure on-site cycle or motorcycle parking facilities.

A subsequent proposal for a Class A1 foodstore (1,476 sq.m gross; 990 sq.m. net) with associated access, parking and landscaping was refused on 3/12/13 on grounds of inappropriate development in the Green Belt and very special circumstances had not been demonstrated; application failed to demonstrate that no sequentially sites were available and the scheme would not have an unacceptable impact on the vitality and viability of nearby town centres; proposal fails to integrate with Broadmead Road, adjoining residential development and the Green Belt and insufficient justification for the omission of a green roof; scheme fails to adequately assess traffic generation and delivery vehicles would encroach upon opposing carriageway (including a bus cage); excessive parking and lack of details as regards staff cycle parking and associated facilities and lack of a PERS audit results in scheme failing to maximise the potential and encouragement of more sustainable transport modes and planning obligations had not been secured.

Previous discussions have been undertaken with respect to this development under a pre-

application enquiry (71486/PRC/2019/191 refers).

4. Planning Policies and Standards

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

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

The Local Plan: Part 1 - Strategic Policies (2012)
The Local Plan: Part 2 - Development Management Policies (2020)
The Local Plan: Part 2 - Site Allocations and Designations (2020)
West London Waste Plan (2015)
The London Plan - Consolidated With Alterations (2016)

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

Emerging Planning Policies

Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to: (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given); (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and (c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (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 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.

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.

Local Plan Designation and London Plan

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

Part 1 Policies:

PT1.E7	(2012) Raising Skills
PT1.BE1	(2012) Built Environment
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
PT1.EM4	(2012) Open Space and Informal Recreation
PT1.EM5	(2012) Sport and Leisure
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.EM11	(2012) Sustainable Waste Management
PT1.T1	(2012) Accessible Local Destinations
PT1.CI1	(2012) Community Infrastructure Provision
PT1.CI2	(2012) Leisure and Recreation

Part 2 Policies:

NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 8	NPPF-8 2018 - Promoting healthy and safe communities
NPPF- 9	NPPF-9 2018 - Promoting sustainable transport
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
LPP 1.1	(2016) Delivering the strategic vision and objectives for London
LPP 2.18	(2016) Green Infrastructure: the multi functional network of open and green spaces
LPP 3.1	(2016) Ensuring equal life chances for all
LPP 3.2	(2016) Improving health and addressing health inequalities
LPP 3.18	(2016) Education Facilities
LPP 3.19	(2016) Sports Facilities
LPP 4.12	(2016) Improving opportunities for all
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.3	(2016) Sustainable design and construction
LPP 5.6	(2016) Decentralised Energy in Development Proposals
LPP 5.7	(2016) Renewable energy

LPP 5.9	(2016) Overheating and cooling
LPP 5.10	(2016) Urban Greening
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.17	(2016) Waste capacity
LPP 5.21	(2016) Contaminated land
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.5	(2016) Funding Crossrail and other strategically important transport infrastructure
LPP 6.9	(2016) Cycling
LPP 6.10	(2016) Walking
LPP 6.13	(2016) Parking
LPP 7.1	(2016) Lifetime Neighbourhoods
LPP 7.2	(2016) An inclusive environment
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.6	(2016) Architecture
LPP 7.13	(2016) Safety, security and resilience to emergency
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 7.16	(2016) Green Belt
LPP 7.18	(2016) Protecting open space and addressing deficiency
LPP 7.19	(2016) Biodiversity and access to nature
LPP 7.21	(2016) Trees and woodlands
LPP 8.2	(2016) Planning obligations
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 5	Development in Green Chains
DMEI 7	Biodiversity Protection and Enhancement
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination

DMEI 13	Importation of Material
DMEI 14	Air Quality
DMCI 1A	Development of New Education Floorspace
DMCI 3	Public Open Space Provision
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LDF-AH	Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **17th June 2020**

5.2 Site Notice Expiry Date:- **12th June 2020**

6. Consultations

External Consultees

66 neighbouring properties have been consulted on 12/5/20, together with Grand Union Village Trust, 2 site notices were displayed on the adjacent road frontages on the 11/6/20 and the application was advertised in the local press on 17/6/20. The last closing date for comments was 8/7/20. A total of 24 responses have been received, 21 in support for the proposals and 3 objection responses (a further 11 responses have been received in support of the proposals, but these came from properties outside of the borough).

Education Provision

- (i) SEND provision is desperately needed in the borough and the local area in particular to support and improve the quality of provision for all our children and young people with special needs,
- (ii) This is a much needed resource as the existing special schools in the local area are highly over subscribed and many SEND schools are needed in the area as difficult to find places,
- (iii) A lot of children with special learning needs will benefit and have their quality of life improved,
- (iv) It will be very helpful for us as a neighbour to have a special needs school near to our area,

Design and Character of the Area

- (v) The school is very well designed and will have very little impact on the surrounding residents once it is built,
- (vi) The building and landscaping would be in keeping with the remainder of the area,
- (vii) Site is subject to occasional fly tipping, and
- (viii) It may be difficult and possibly impossible but I would like it if the park area was made available for children in the area at weekends or even in the afternoons, once the school is closed as there are no good parks in the area,

Objection comments:-

Highway Issues

- (ix) Broadmead Road and Ruislip Road are already heavily congested at most times, but especially during rush hours, due to the fact that everyone uses it as a bypass to avoid the A312 which is also ill equipped to handle the amount of traffic. This will no doubt cause extreme amounts of traffic and pollution to what is already a very heavy populated area, causing extra health issues,

(x) We will be against the proposal unless the A312 is widened or an under/over pass is put in place at the White Hart Roundabout and/or Broadmead Road made into a red route to ease the congestion already occurring on Broadmead Road,

Amenity

(xi) This will also effect our view and instead we will be overlooking a building,

(xii) Noise from the school will be a big issue.

GLA (Summary):

London Plan and the Mayor's intend to publish London Plan policies on educational facilities; Green Belt; design; inclusive design; sustainable infrastructure; green infrastructure; and transport are relevant to this application. Having regard to these policies the application complies with some of these policies but not with others as per the schedule below:

- Principle of development: The proposal represents inappropriate development in the Green Belt, and there would also be harm to openness and a conflict with Green Belt purposes; very special circumstances must therefore be demonstrated. There is a clear need for the proposed SEND school in the south of the borough, which would provide benefits for the local community. The Sequential Site Assessment (SSA) is generally robust, although further information is requested with regard to one site identified and the Council must also confirm it is content with the sites assessed

- Urban design: The architecture, layout and materials are generally supported. Pedestrian access to the school should be improved. The Council should review the fire statement in consultation with building control officers.

- Inclusive design: The development would provide a high standard of inclusive design and accessibility.

- Sustainable infrastructure: The development is air quality neutral, there would be no air quality impacts on existing receptors and air quality for future occupants would be acceptable. The applicant should follow the energy assessment guidance and confirm the proposed carbon emissions factors. Further information is required on energy efficiency and overheating, how the development meets the heating hierarchy and renewable energy. Further details on how SuDS measures at the top of the drainage hierarchy will be included in the development, and how greenfield runoff rate will be achieved should be provided. Further information on the water consumption targets should also be provided.

- Green infrastructure and natural environment: The applicant should calculate the Urban Greening Factor of the proposed development, meeting the target score of 0.3, and provide evidence of a net biodiversity gain.

- Transport: The Transport Assessment should be prepared in line with TfL's Healthy Streets Transport Assessment Guidance. Further information is required with respect to Healthy Streets, cycle parking and trip generation. An Active Travel Zone assessment should be provided. Appropriate conditions and planning obligations should also be secured.

TfL:

The site of the proposal is on a Borough road, however is located in close proximity to A312 The Parkway, with forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN, and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.

It is noted that the submitted Travel Plan, Delivery and Servicing Plan and Parking Management Plan do not appear on the planning website and have therefore not yet been reviewed by TfL. After reviewing the submitted Transport Assessment, TfL wishes to make the following comments:

The Transport Assessment (TA) has not been prepared in line with TfL's Healthy Streets TA Guidance; in future TfL recommend this guidance is followed. The applicant should demonstrate how the development proposal accords with the Healthy Streets Approach and the Mayor's Vision

Zero agenda.

The development proposes a total of 44 car parking spaces. This provision accommodates the expected demand of staff, visitors and parents. Therefore, the proposal is considered to provide the minimum necessary parking in line with Policy T6 of the ItP London Plan. It is welcomed that car parking spaces could be removed in future should they become surplus to requirements.

The car parking provision includes 2 Blue Badge spaces, in accordance with Policy 6.5 of the ItP London Plan. An additional 2 car parking spaces should be enlarged bays as per the policy requirements.

10 car parking spaces are provided with Electric Vehicle Charging Points (EVCPs). The remaining spaces should be provided with passive provision. This should be secured by condition.

The provision of 8 long-stay cycle parking spaces for staff is considered appropriate. However, in line with ItP London Plan Policy T5, a minimum of 2 short-stay spaces should additionally be provided for visitors. The cycle parking should be laid out in accordance with the London Cycling Design Standards (LCDS) and cater for larger cycles, including adapted cycles for disabled people. The provision of showers and changing rooms is welcomed, however this should be shown on plan.

In the interests of pedestrian safety and Vision Zero, it is requested that the vehicle access points are constructed with dropped kerbs and tactile paving. It is acknowledged that Stage 1 Road Safety Audits have been commissioned for the proposed access points.

Having reviewed the estimated traffic generation of the proposal, TfL do not expect that the proposal would result in significant traffic and trip impact to the TLRN.

The applicant has not estimated the number of staff trips undertaken by sustainable modes of transport. Therefore the development's impacts on the local public transport, walking and cycling networks have not been fully assessed.

The submission and implementation of a Construction Logistics Plan (CLP), prepared in line with TfL's CLP Guidance, should be secured by condition.

The footway and carriageway on Broadmead Road must not be blocked during the construction and maintenance of the proposal. The construction of the development should not at any point encroach on the clear space needed to maintain the safe and uninterrupted flow of road users and pedestrians. All vehicles associated with the works must only park / stop at permitted locations.

Further TfL comments:

These provide more detail on the matters raised in the GLA Stage 1 Planning Report GLA/5449/RH/01 dated 20 July 2020. Please note that these are additional also to any response you may have received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest.

This response relates to an application for the 'construction of a new single storey 80 Place SEND School together with associated landscaping, play areas, boundary treatments and car parking'.

Please note that the following comments represent the view of TfL and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. In addition, these comments do not necessarily represent the views of the Greater London Authority (GLA).

Site Description and Context

The application site is located on land to the southeast of the junction of Broadmead Road and Ballinger Way. The nearest part of the Transport for London Road Network (TLRN), A312 The Parkway, is approximately 500m west of the site.

The nearest bus stops are located on Broadmead Road within 120m of the site, serving the E6 bus route. A further 4 bus routes are available within 550m of the site. Consequently, the site records a public transport access level (PTAL) of 2 on a scale of 0 to 6b, where 6b is the highest.

Active Travel Zone

An Active Travel Zone (ATZ) assessment has not been undertaken. The applicant is required to prepare an assessment using TfL's step-by step guidance. The assessment should include the local bus stops as key destinations and demonstrate a consideration of KSI's along the key routes in line with the Mayor's Vision Zero Agenda. The assessment should identify potential improvements to the local walking and cycling environment in accordance with the Healthy Streets Indicators.

Access

Vehicle access is proposed via a one-way arrangement, with entry from Ballinger Way and exit onto Broadmead Road. Pedestrian / cycle access points are provided adjacent to the vehicle accesses. In the interests of pedestrian safety and Vision Zero, it is requested that the vehicle access points are constructed with dropped kerbs and tactile paving. It is acknowledged that Stage 1 Road Safety Audits have been commissioned for the proposed access points.

There are no delineated pedestrian routes linking the car parking spaces to the main entrance. These are required to ensure safe pedestrian access in accordance with Intend to Publish (ItP) London Plan Policy T2 - Healthy Streets and Vision Zero. Additionally, it is noted that there are currently no formal pedestrian crossings that align with the proposed pedestrian entrance on Broadmead Road. Whilst we appreciate the majority of pupils (if not all) will be picked up / dropped off within the school premises by minibus or car, we note that the school will serve local community functions during evenings, weekends and out of term. Therefore, the site should be well connected to the local walking environment to ensure that site users who would access the school by foot are catered for. As such, TfL expect appropriate mitigation in the form of a new formal pedestrian crossing to be offered, with the works secured through a Section 278 agreement.

Deliveries will be accommodated off-street via the above vehicle access arrangement and will be timed outside of school start / finish times. Waste collection will be undertaken as per the existing situation from Ballinger Way. The proposed arrangements accord with Policies T2 and T7 of the ItP London Plan.

Car Parking

The development proposes a total of 44 car parking spaces. This provision accommodates the expected demand of staff, visitors and parents. Therefore, the proposal is considered to provide the minimum necessary parking in line with Policy T6 of the ItP London Plan. It is welcomed that car parking spaces could be removed in future should they become surplus to requirements.

The car parking provision includes 2 Blue Badge spaces, in accordance with Policy 6.5 of the ItP London Plan. An additional 2 car parking spaces should be enlarged bays as per the policy requirements.

10 car parking spaces are provided with Electric Vehicle Charging Points (EVCPs). The remaining spaces should be provided with passive provision. This should be secured by condition.

A Parking Management Plan (PMP) has been prepared to accompany the application. The plan should be monitored and reviewed as part of the Travel Plan and should set out how car parking could be re-provided as cycle storage in future. The plan should be secured by condition.

Cycle Parking

The provision of 8 long-stay cycle parking spaces for staff is considered appropriate. However, in line with ItP London Plan Policy T5, a minimum of 2 short-stay spaces should additionally be provided for visitors. Further, cycle parking should be provided for pupils who live very local to the school and may wish to cycle to school.

The cycle parking should be laid out in accordance with the London Cycling Design Standards (LCDS) and cater for larger cycles, including adapted cycles for disabled people. The provision of supporting facilities (showers and changing rooms) is welcomed, however this should be shown on plan.

Trip Generation and Impacts

Having reviewed the estimated traffic generation of the proposal, TfL do not expect that the proposal would result in significant impact to the TLRN.

The applicant has not estimated the number of staff trips undertaken by sustainable modes of transport. The development's impacts on the local public transport, walking and cycling networks need to be fully assessed in order to accord with ItP London Plan Policy T4.

Delivery and Servicing and Construction Logistics Plan

The submitted Delivery and Servicing Strategy is welcomed and generally acceptable. A final Delivery and Servicing Plan (DSP) should be secured by condition.

An Outline Construction Logistics Plan (CLP) should have been submitted as per TfL's Healthy Streets TA Guidance. The submission and implementation of a Detailed CLP will need to be secured by condition. The CLP will need to be prepared in accordance with TfL's CLP Guidance and include details of: site access arrangements, booking systems, construction phasing, likely construction trips generated, vehicle routes, scope for load consolidation in order to reduce the number of road trips generated and measures to improve safety for vulnerable road users. The CLP will also need to include co-ordination arrangements with other developments in the area to ensure management of cumulative impacts.

Travel Plan

The submitted framework School Travel Plan (TP) is welcomed and generally acceptable. TfL supports the aim to achieve Bronze STARS accreditation after one year of occupation. The final TP and all agreed measures should be secured, enforced, monitored and reviewed through the Section 106 agreement. The full TP should set ambitious mode share targets for increasing sustainable travel, in line with the Mayor's Transport Strategy.

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

In summary, we request that the applicant addresses the matters discussed above, before we can be supportive of the proposal.

We would like to draw to your attention the following areas or details that will require further work:

- The Transport Assessment (TA) should be prepared in line with TfL's Healthy Streets TA Guidance.
- An ATZ assessment should be submitted, including local bus stops as key destinations.
- The applicant should review the pedestrian access arrangements and ensure appropriate provision / mitigation is made, in line with ItP London Plan Policy T2 and Vision Zero. This should include a new formal pedestrian crossing.
- 2 car parking spaces should be enlarged bays as per ItP London Plan Policy T6.5.
- Additional cycle parking should be provided for visitors in accordance with ItP London Plan T5, and provision should be made for any school children who wish to cycle. The proposed supporting facilities should be shown on plan.
- The applicant should fully assess the impacts on the local public transport, walking and cycling networks to accord with ItP Policy T4.

London Borough of Ealing:

1. Ealing Council is happy for Hillingdon to assess the application in accordance with Hillingdon and London Plan policy. With regard to the concerns of Ealing Council, in determining the application, Ealing Council would request that consideration is given to traffic congestion on Broadmead Road north of the application site (within the Ealing boundary) during pick up and drop off hours. Consideration should also be given to conditioning a travel plan to encourage, where possible, the use of more sustainable forms of transportation.

2. This development will increase vehicular, pedestrian and cycling trips to the school in comparison to the existing use. To promote modal shift, then some measures should be introduced to reduce the risk of accidents, especially to vulnerable road users such as pedestrians and cyclists on the adjacent road network and junctions.

Section 106 contributions are required to mitigate impact of traffic congestion & accident risk and improve pedestrian & cycle accessibility to the school.

This development is likely to increase congestion during the morning peak period. The applicant should contribute approximately £40,000 (a) to improve pedestrian and cycle infrastructure around the road network near the application site and introduce accident remedial measures on Broadmead Road which include junction improvement at the junction of Broadmead Road junction with Ruislip Road.

Heathrow Airport Ltd:

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

GLAAS:

Recommend No Archaeological Requirement

NPPF section 16 and the Draft London Plan (2017 Policy HC1) make the conservation of archaeological interest a material planning consideration.

Having considered the proposals with reference to information held in the Greater 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.

The application is not within an Archaeological Priority Area and is on land used as a brickfield in the 19th century indicating that it has very low archaeological potential.

No further assessment or conditions are therefore necessary.

Sport England:

Sport England - Non Statutory Role and Policy:

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. More detail can be found at <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#open-space-sports-and-recreation-facilities>.

This application falls within the scope of the above guidance as it relates to new facilities.

Sport England assesses this type of application in light of the National Planning Policy Framework (NPPF) and against its own planning objectives, which are;

Protect - To protect the right opportunities in the right places;
Enhance - To enhance opportunities through better use of existing provision; and
Provide - To provide new opportunities to meet the needs of current and future generations.

Further information on the objectives and Sport England's wider planning guidance can be found at <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport>

The Proposal and Sport England Assessment:

The application proposes a new school SEND School on an area of open space. The submitted documentation is not overly clear on the extent of sports facilities proposed however there appears to be a hydrotherapy pool, a trampoline pit and hall in the scheme. If the proposed hall is intended to be a sports hall this should be designed and constructed in accordance with Sport England's guidance with the appropriate size, materials and line markings to ensure sport can safely be played. For more details please see Sport England's sports hall guidance can be found at <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/sports-halls> Sport England would also recommend that the other sporting facilities are designed and constructed in line with the relevant national design guides.

Sport England would also welcomed if these facilities would be available for community use outside school hours. It is advised that any community use is secured through a Community Use Agreement (a template is available on Sport England's website)

Conclusion:

In light of the above, Sport England does not wish to object to the application.

There is a free online resource from Sport England (Use Our School) that offers further guidance and information for local authorities and other education providers on how to make the best use of school facilities for the benefit of the local community. It is especially useful for those who have responsibility within a school for establishing, sustaining and growing community activity on school sites. 'Use Our School' can be accessed here; www.sportengland.org/useourschool.

The absence of an objection to this application, in the context of the Town and Country Planning Act, cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.

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.

British Gymnastics Organisation:

As a SEND school I would advise the applicant to contact BG for advice on provision and delivery of programmes for SEND pupils - and also scope for community use - I would recommend a community use agreement is in place as part of the planning approval.

Natural England:

Natural England has no comments to make on this application. Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice. Natural England and the Forestry Commission have also published standing advice on ancient woodland and veteran trees which you can use to assess any impacts on ancient woodland. The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies

on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development. We recommend referring to our SSSI Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>. Yours sincerely, Elizabeth Ball Operations Delivery, Consultations Team Natural England County Hall Spetchley Road Worcester WR5 2NP Tel: 0300 060 3900 Email: consultations@naturalengland.org.uk Web: www.gov.uk/natural-england *

Hertfordshire and Middlesex WildlifeTrust:

Objection: Ecological surveys not completed, Defra biodiversity metric assessment not supplied, biodiversity net gain not demonstrated, not compliant with BS 42020, Hillingdon Local Plan or NPPF. 1. The ecological survey that has been supplied identifies habitats that are present and recommends protected species surveys that should be conducted. Reptile surveys have been recommended and not completed (Ecology Link 4.7). ODPM circular 06/05 states: '99. It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.' This information has not been provided. The application cannot be decided without this information. If reptiles are found full mitigation and compensation measures must be described. 2. The Hillingdon Local Plan states: '6.28 All ecological reports or information submitted should adhere to nationally accepted best practice survey standards and be consistent with the British Standard BS 42020: 2013 Biodiversity - Code of Practice for Planning and Development or an updated variation. Where appropriate, the Council will require the use of the approved DEFRA biodiversity impact calculator (as updated) to inform decisions on no net loss and net gain.' 'DMEI7 A) The design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement.' NPPF states: 170. Planning policies and decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity' The statement in the design and access statement; 'The enhancements to the site from a biodiversity / ecological point of view are significant and wholly compliant with the aims of adopted Local Plan Part 2 Policy DMHB14 (Trees and Landscaping), Policy DMEI1 (Living Walls and Roofs and on site vegetation) and Policy DMEI 7 (Biodiversity Protection and Enhancement)', is not correct because they have not been measured.

There is a clear national and local requirement for planning decisions to deliver a net gain to biodiversity. In order to determine this, net gain must be measured. In accordance with the local plan the Defra metric must be used to demonstrate net gain in a measurable way. This has not been provided and so net gain has not been proven. The application cannot be approved until this has been done and a net gain demonstrated. Net gain should be an increase in biodiversity value of 10%. If it cannot be provided onsite, an offsite solution should be provided or the development cannot be approved. 3. BS 42020 compliant reports are a requirement of the local plan. This states: '8.1 Making decisions based on adequate information The decision-maker should undertake a thorough analysis of the applicant's ecological report as part of its wider determination of the application. In reaching a decision, the decision-maker should take the following into account: h) Whether there is a clear indication of likely significant losses and gains for biodiversity.' Without a Defra metric assessment losses and gains cannot be assessed in an objective way. It goes on to state: '6.6.2 An ecological report should avoid language that suggests that recommended actions "may" or "might" or "could" be carried out by the applicant/developer (e.g. when describing proposed mitigation, compensation or enhancement measures). Instead, the report should be written such that it is clear and unambiguous as to whether a recommended course of action is

necessary and is to be followed or implemented by the applicant.' The ecological report that supports this application does not contain any definitive measures that must be implemented, only 'recommendations' of what could be done. Consequently the LPA have no knowledge of what measures will be delivered. This is not compliant with BS 42020 and consequently the local plan. Only measured, mitigation, compensation or enhancements that will be done are admissible. The application cannot be approved until this has been rectified.

Thames Water:

Waste Comments

With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

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

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

Internal Consultees

Policy Officer:

Development Plan

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)

The West London Waste Plan (2015)

The London Plan - Consolidated With Alterations (2016)

Material Considerations

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.

1.6 The Mayor has considered the Inspectors' recommendations and, on the 9th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for any of the Inspectors' recommendations that the Mayor does not wish to accept.

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.

Designations

Green Belt

Proposal and Site History

This proposal seeks the construction of an 80 place SEND primary school on open Green Belt land adjacent to the borough boundary with Ealing. All of the proposed development site and the surrounding land to the south and east is designated as Green Belt.

The applicant provides a detailed history of the site which some years ago formed part of the Taylor Woodrow's private Sports and Social club situated adjacent to their former works site. As part of the wider redevelopment of the area, the sports club building was demolished prior to 2000, and outline permission was granted for the application site to provide a new sports complex assumingly available to local residents. Reserved matters were subsequently submitted for a 3,717 m² building with a footprint of 2,160m² which the applicant identifies was refused on grounds relating to the impact on highways.

The site is currently cleared and hoarded with a proportion (866m²) laid to hardstanding. It is unclear from the submitted information which part of the site is accessible from the surrounding open space and the extent to which it forms part of the wider recreational space within which it is situated. It would be helpful to clarify this with the applicant as it is clear from the original application that the provision of this land for sports and leisure uses was an integral part of the

wider masterplan and the land was intended to be development for the benefit and use of wider residents. It would also be useful to understand why further progress has not been made since 2002.

It is important to note at this point that provision of facilities related to outdoor recreation would not have been inappropriate development in the Green Belt and the approval of such buildings should not be seen to indicate the acceptability in principle of development on this site that would be inappropriate. Furthermore, in policy terms the Council does not agree with position stated by the applicant that the majority of the site meets the definition of previously developed land given the NPPF specifically excludes land that 'that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.' Currently aerial photographs demonstrate the land is clear and landscaped in character without any permanent structures.

Key Policies

The NPPF, London Plan policy 7.16, policy DMEI 4 'Development on the Green Belt or Metropolitan Open Land' the proposed school building would be inappropriate development in the Green Belt which by definition is harmful. Any such proposal will need to demonstrate 'very special circumstances' to show that the potential harm by reason of inappropriateness, and any other harm, is clearly outweighed by other planning considerations. The planning position is that a new school on this site does not fall within any of the exceptions in para. 145 or 146 of the NPPF.

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

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

The Council's Local Plan Part 1 Strategic Policies (para. 9.49) also highlights that the capacity of existing school sites is becoming increasingly limited and that these 'very special circumstances may necessitate the release of greenfield or Green Belt sites'. Such sites will only be identified where the need for additional forms of entry cannot feasibly be met through the expansion of existing schools or new development on suitable brownfield land. Broad support for the development of new schools to meet needs is included within policy CI2 of the Local Plan Part 1.

The Council's Local Plan Part 2 includes policy DMCI 1A 'Development of new educational floorspace' which sets out detailed criteria for the assessment of such proposals. These criteria include taking account of the compatibility with surrounding uses and existing planning policy designations, the impact on the provision of open space and the location and accessibility of the site.

Finally, given that some of the site is currently public open space, the requirements of policy DMCI 3 that development should not be permitted where it harms the character and function of a public open space.

Principle of Development

As outlined above, the proposed development of the site for an SEND school is considered to be inappropriate development that is by definition harmful and should not be approved except in very special circumstances. The following sections of these comments assess the impact on the Green and the weight that should be given to the very special circumstances identified by the applicant.

Impact on the Green Belt

Paragraph 133 of the NPPF confirms that the Government attaches great importance to Green Belts. This is further emphasised by the Mayor of London through the London Plan which seeks to

protect the current extent of London's Green Belt. Para 134 of the NPPF sets out the purposes the Green Belt serves with the purposes identified as relevant to this site including checking the unrestricted sprawl of large built up areas and to assist urban regeneration, by encouraging the recycling of derelict and other urban land.

The PPG was revised in July 2019 to include the advice on the role of the Green Belt in the planning system. Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case.

By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects - in other words, the visual impact of the proposal may be relevant, as could its volume; or
- the degree of activity likely to be generated, such as traffic generation.

It is therefore appropriate to take into account both the visual and spatial impact of a development when assessing the effect of the development on openness. As discussed the application site is largely a greenfield site with an element of hard standing.

Openness

The submitted plans identified that the proposed development would see the introduction of a single storey building with double height elements, associated car parking and outdoor play areas into the Green Belt. The applicant has sought to demonstrate that the overall footprint of the development has been kept to a minimum and such does not exceed the minimum recommended in government guidelines (BB104). Regardless of size, it is acknowledged that the introduction of built structures onto this open land will impact on the openness of the green belt. This harm is considered to be significant given that it will reduce the visual and spatial break afforded by the site as a transition point between the existing built up area and wider area of Green Belt within which the site is situated.

Visual Impact

The Design and Access statement describes how the design has evolved to respond to its Green Belt location by creating a 'new frontier between the urban and greenbelt domains'.

To this end, the rear of the proposed building has been designed with materials intended to reduce its impact (primarily through the inclusion of a green roof). Landscaping is also proposed to help screen the building further particularly at the rear. However, the front of the site will be significantly altered both by the building itself, the introduction of hardstanding to create a car parking and the provision of a 2.4 m metal fence around the whole perimeter of the site. It will no longer read from the front as the end of the existing urban area whilst the rear of the building will be clearly separated from the surrounding land. A more detailed assessment should therefore be undertaken as part of the overall planning assessment. Of particular importance will be the views from within other areas of the Green Belt and in particular views from the canal together with the proposed boundary treatments. At present however the visual impact at the front of the site is considered to be significant whilst the impact to the rear will be moderate.

Degree of harm to Green Belt function

As explained above the application site forms part of a wider area of Green Belt that runs between Hillingdon and Ealing creating a sense of separation between these two boroughs and provides a buffer to the Grand Union Canal which runs through the middle. It is considered that the siting of the proposed development at the north western tip of the Green Belt this is the most sensitive approach at a strategic level, which minimises the harm to the function of the wider area of Green Belt. Thus whilst the proposed school building will extend the existing urban area, the footprint is modest and will be set within large areas of landscaping to the rear reducing the extent to which the proposals will add to the sense of urban sprawl. Consequently, at this stage it is considered that

impact on the function of the wider green belt in this area would be limited in nature.

Very Special Circumstances

The applicant has set out a series of very special circumstances which are summarised and considered in detail below:

- LBH has a severe shortage of SEND school places particularly in the south of the borough.
- This is the only available and suitable site - there are no sequentially preferable options
- The majority of the site has not been accessible to the public but the loss of some public access will be compensated for by community use of the school facilities
- The proposals have been designed to minimise carbon emissions
- A comprehensive landscape proposal would provide a significant enhancement to biodiversity.

Need for SEND Spaces

Subject to final confirmation from LEA colleagues, it is accepted that there is a need for additional SEND primary school places within the borough and that ideally these should be in the south of the borough to balance with the existing provision in the north. However, the need for additional SEND school places is not, on its own a very special circumstance as this need could in theory be met in a variety of ways (e.g expansion of an existing school site, development on a brownfield site, etc). Instead it must also be demonstrated why they are needed in this part of the borough. The applicant has provided evidence of the current issues arising from transporting children from all across the borough to the only existing alternative north of the A40. In particular, the transport times can be lengthy which has a negative impact on the well-being of pupils. On this basis it is accepted that there is a need for SEND places to the south of the A40 and this can be afforded significant weight.

Lack of available non-Green Belt Sites

As summarised below, the applicant has undertaken a sequential site assessment to support the location of a new SEND school on this site. The applicant identified the following search criteria for their assessment:

- The site must be located in the south of the borough,
- The site must be at least 8,370 sq m in area
- The GIFA must be no lower than 2,380 sq m; and
- The site must be able to accommodate the school on a single floor level or with limited elements staff accommodation at first floor.

The applicant undertook a Co-Star property search to consider all available commercial buildings. No site of sufficient size as either in part (ground floor) or as a whole was identified. Some of the sites would have also resulted in other policy conflicts such as the protection of industrial land. Consequently the Council is satisfied that there are no other commercial sites currently available that would be suitable to accommodate a school of the required size.

The second part of the assessment focused on the site allocations in the Local Plan. Whilst the majority of findings are agreed in that those sites which allow for a mix of uses could not accommodate a school. There are two sites which officers have identified have been assessed in full by the applicant. The first is Nestle Site B which has a specific allocation for an education use and the second is part of Site SA28 (St Andrews Park) where the Battle of Britain club site has the potential for redevelopment from one vacant community use to another. It is therefore requested that the applicant undertakes further work to confirm the availability or otherwise of these sites.

Finally, to confirm that all non-Green Belt options have been fully considered, the applicant and/ or relevant officers in the Council should also confirm that there is also no alternative option for the redevelopment or expansion of an existing school.

Should these outstanding options be identified as unsuitable, then it would be accepted that the

applicant has undertaken a thorough site location assessment and that at present there do not appear to be any suitable alternative sites that would be suitable for a D1 use of this size. As stated above, it is agreed that the proposed site location would meet a specific need within the south of the borough which is not met on other sites. The lack of alternative sites in the borough would represent a very special circumstance which could be attributed significant weight.

Community Use of the Facilities

The proposed development on the site will result in the loss of public open space which is contrary to policy DMCI 3. To mitigate this loss, it is proposed to offer facilities such as the hall and hydrotherapy pool to the local community outside of school hours. Such a proposal will need to be secured through a planning legal agreement. Whilst it is recognised that this is a positive proposal, given it is required to mitigate other planning harm arising from the development it can only be given limited weight as a very special circumstance for developing in the Green Belt.

Energy and Sustainability Measures

The applicant has identified the scheme will achieve a 47% reduction in carbon emissions and BREEAM very good. However It is noted that policy DMCI 1A seeks zero carbon school developments. It will be for the Council's sustainability officer to confirm the extent to which the proposal meets these policy requirements but at present it would appear that the scheme does appear to zero carbon and as such this aspect of the scheme cannot be given any weight as a special circumstance.

Landscaping Proposals

A high quality landscaping scheme has the potential to significantly enhance the setting of the site and the overall quality of the remaining open Green Belt. It is noted that the current site is hoarded, overgrown and in some areas covered in hard standing. It also appears subject to fly tipping. Subject to the views of the relevant specialist a high quality landscaping that would improve the visual amenity of the open areas of the site could be given moderate weight as a very special circumstance.

Conclusion

The proposed development amounts to inappropriate development within the Green Belt, contrary to Policy DMEI 4 of the Local Plan Part 2 and Paragraph 144 of the NPPF 2019.

Significant weight against the development is attached to the harm to the spatial and visual dimension of the Green Belt, which will not preserve the openness. More limited weight is attached to the harm to the Green Belt by conflicting with purposes of inclusion within the Green Belt.

The applicant has put forward very special circumstances by which the development should be considered acceptable. These have been assessed on a policy basis as follows (i.e. the case officer will have the opportunity to consider the benefits of the scheme in its entirety which may alter the balance of these considerations and this should be reflected in the final committee report):

Significant weight in favour of the development is attached to the following benefits: -

- The acute need for additional primary SEN place in the south of Hillingdon
- The lack of available non Green Belt Sites.

Moderate weight in favour of the development is attached to the following benefits: -

- Proposed improvements to remaining areas of open space within the site and use of screening.

More limited weight in favour of the development is attached to:

- The proposed use of the new facilities by the school (given this is part to mitigate for the loss of public open space.

It is considered that whilst the individual benefits of the scheme are not considered to outweigh the level of identified harm, the cumulative benefits are considered to outweigh the identified harm to the Green Belt, such that very special circumstances required to justify development in the Green Belt do exist in accordance with Paragraph 144 of the NPPF 2019.

Therefore, the development proposals would be in accordance with Policy DME1 4 (A) of the Development Management Local Plan which states that inappropriate development will not be approved unless the applicant can demonstrate very special circumstances that will clearly outweigh the harm.

Officer comment:

The Policy Officer's comments are dealt with in the main report with the exception of the query raised as to why the Sports Centre on site was not pursued. The applicants advise in their letter dated 30/7/20 that having spoken to the site owner (Taylor Wimpey), they understand that the original operator of the sports club, following the refusal of the reserved matters application, rather than appeal the decision decided to walk away and despite Taylor Wimpey seeking other operators, no interested parties (for a leisure use) have been forthcoming and the site has therefore remained vacant.

Conservation and Urban Design Officer:

The application seeks planning permission for the construction of a new single storey 80 Place Special Educational Needs and Disability School together with associated landscaping, play areas, boundary treatments and car parking.

Previous discussions have been undertaken with respect to the development under pre-application 71486/PRC/2019/191.

The proposed development site is situated within the Green Belt on a prominent junction where Ballinger Way meets Broadmead Road in an area of new residential development that is characterised by houses and flats that range in height between 2 and three storeys.

The site comprises land currently vacant, the perimeter of which is largely hoarded up. The land lies to the south of Grand Union Village, a 700 + home 'eco-village' built between 2002 and 2007.

The school building will comprise a range of cellular and open plan learning spaces, small group and quiet rooms, therapy rooms, a main hall, a hydrotherapy suite and a range of staff facilities. The school grounds will comprise a car park, minibus drop-off zone, servicing zone, food and horticulture gardens, art and music gardens, quiet courtyard gardens and activity areas and trials.

The building has been designed sensitively taking into consideration its location having effectively been split in to two portions respecting the different interfaces. The front portion responds to the more urban frontage of Broadmead Road and Ballinger Way with a brick frontage whereas the rear portion responds to the Green Belt with a softer timber clad elevations and a green roof. This approach taken with the low building height of one / one and a half storeys would allow the building to sit quietly within both the urban and Green Belt settings.

The building appears to be of a high standard of design and no objection is raised to the design and layout of the new school building. There are concerns, however, with the large expanse of parking to the west of the school which creates an unattractive hard landscaped area which detracts from the setting of the new school building. It is accepted that an educational facility of this type will need additional parking to meet the needs of the school, however, it is felt that additional soft landscaping should be introduced to help reduce its impact by creating a softer setting to the school and allow it to site more quietly within the Green Belt.

The success of the scheme will be dependent on the finer detailing, choice of materials and

workmanship. Should the application be minded for approval then it is suggested that conditions be attached requesting samples of all external materials and detailed drawings of the, windows, doors railings and roof weathering details and covered walkways.

Education Services:

Education Officers strongly support this proposal for a new 80 Place SEND School which will meet the needs of pupils with a mix of the Profound and Multiple Learning Difficulties and Severe Learning Difficulties and Autistic Spectrum Conditions.

The Borough is committed to ensuring each pupil has the most appropriate provision to support them to thrive, so far as possible local to their home. This new provision is vital to meet specialist demand south of the A40 and the Local Authority will be commissioning all 80 places. No alternative site could be identified, this is the optimum site available.

The number of pupils with EHCPs naming the mix of these specific needs has risen by 52% from 2016 to 2019, with an increase of 78% in EHCPs naming Autistic conditions as the primary need. The rise is largest in the primary age groups, which this new provision would serve. Many are diagnosed soon after birth and many have comorbidities, such as physical disabilities, visual impairment as well as cognitive learning difficulties. There are increasing numbers of young children with complex needs who can attend day schools, and almost all are transported to school on minibuses.

It is desirable for most pupils with EHCPs to have mainstream school experience, but these pupils require specialist provision, and ideally close to home. Currently all that specialist provision in the Borough is absolutely full to capacity and significantly oversubscribed. There is only one school with this type of primary aged special needs provision. It is three miles north of the A40, so some pupils have over an hour's mini-bus journey twice a day which is not good practice for such vulnerable pupils, prevents close contacts with parents and adds pollutants to the wider environment.

We have strong evidence of the need for extra provision in the south of Hillingdon for primary aged pupils with EHCPs on the spectrum of Autistic Spectrum Conditions and Severe and Profound and Multiple Learning Difficulties. Currently some pupils are receiving temporary individual home tuition until a suitable place is found or are attending out of borough provision requiring longer journeys and disruption to families. Both these unsatisfactory solutions are at greater public cost.

The need for 80 extra places for pupils with complex needs and autism could not be met by expansion or redevelopment of any existing school site, and all non-Green Belt options have been fully considered and no sufficient site was found in searches, hence this is the optimum option and there is no alternative option.

We need to secure the additional provision in the south of the borough to ensure we can meet demand from the north and south, and have two distinct catchments. The Trust has proved successful in their other schools at meeting these needs, and opened another free school five years ago. Each of their schools provide multi-professional teams integrating education with therapy and support for families and carers.

Highway Engineer:

This proposal is for the development of a new 80 place Special Educational Needs Primary School. The application site is situated on the corner of Broadmead Road and Ballinger Way, Yeading. The site is currently vacant. At the junction of Broadmead Road and Ballinger Way a pelican crossing and a speed table have been provided. Broadmead Road benefits from a 30mph speed limit with footways and street lighting on both sides of the road. Ballinger Way is subject to a 20mph speed limit and also benefits from footways and street lighting on both sides of the road. Broadmead

Road connects with Glencoe Road to the south together which provides a link from the A312 Willow Tree Roundabout to the B455 Ruislip Road to the north. Broadmead Road is a bus route along which the E6 Greenford to Bull Bridge Roundabout and 696 Hayes to Ruislip operate. Vehicle access into the site would be one-way with the entrance from Ballinger Way approximately 15 metres back from the junction with Broadmead Road with the exit onto Broadmead Road.

The development would provide 44 car parking spaces of which two would be wheelchair accessible and 10 would have electric charging points. There would be a further 2 minibus parking spaces and a 60 metre drop off and pick up layby which would be able to accommodate 9 minibuses. Thirty two car parking spaces would be reserved for staff and 10 available for visitors, parents and taxis. Eight cycle parking spaces would be provided as well as 2 motorcycle parking spaces. With the exception of waste collection all servicing would take place within the school site. The waste collection would take place on street by wheeling the bins from the waste store located adjacent to the northern boundary Arcon Drive.

Transport for London use as system called PTAL (Public Transport Accessibility Level) to measure access to 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 1b indicating access to public transport is poor compared to London as a whole suggesting that there will be a strong reliance on the private car for trip making.

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. 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 to be determined on 'an individual basis using a transport assessment and where applicable school travel plan/travel plan. Where relevant, provision should be made for coach/bus access and parking'.

The Hillingdon Local Plan: Part 2 Development Management Policies (2020) requires that 10% of parking spaces must be for blue badge holders, for this development this would be 4 spaces giving a shortfall of 2 spaces. Should planning permission be granted, the Highway Authority would want a condition requiring the development to provide 4 blue badge parking spaces. The quantum of motorcycles, mopeds and scooters parking spaces proposed is policy compliant, these should be provided with anchor points to make them secure.

According to the Transport Assessment, the majority, if not all pupils would be eligible for free school transport provided by London Borough Hillingdon. Most pupils would arrive at the school by minibus, only a handful of pupils are expected to be driven by parents. All pupils would be dropped off and picked up within the site, this is supported as it helps to minimise impact on the neighbouring residential streets.

A Framework Travel Plan has been submitted as part of the planning application. This has been assessed by the Highway Authority and the following amendments are required for it to be acceptable as a Full Travel Plan. The requirement to make these changes should be secured as a condition of planning approval. The Travel Plan should include targets for reducing the number of pupils being driven to school alone in a private car and should set out a series of robust measures that when implemented will achieve these targets. The Travel Plan should also include details regarding how the Travel Plan will be monitored and set out the actions that would be taken in the event of these targets not being met. To the list of measure that will be implemented the applicant should add a commitment that the Travel Plan Coordinator will make staff aware of the adult cycle training offered by LB Hillingdon, provide information on local cycling routes and work with the whole school community to provide personalised travel planning advice. The site must display public transport information in real time at the reception/foyer to encourage public transport use.

The Highway Authority also requires that the Travel Plan Coordinator engages with partners to explore new ideas to help deliver genuine alternatives to travelling to the site by private car.

As surety that the Travel Plan will be implemented and targets achieved the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered the Highway Authority will use this bond to implement the Travel Plan itself. This should be secured by way of a S106 agreement. If the Travel Plan is successful the bond will be returned.

A Service and Delivery Plan has also been submitted as part of the planning application, this has also been reviewed and is considered satisfactory.

To help the High Authority understand the transport impact of the development, the applicant has provided a Transport Assessment. This mentions that the school would employ a total of 66 staff, of which 53 are to be full time and 13 part time. Of these 32 would be full time Teaching Assistants and 14 full time Teachers. In order to establish the profile of trip generation data has been obtained from the 2011 Travel to School Census Dataset in combination with on-site observations at the existing Grangewood School in Ruislip. This approach is accepted. Based on the 2011 census data for pupils travelling to SEN schools within the borough, 84.8% arrived by bus/minibus, 10.2% by car/van, 2.4% walked to school with 2.6% arriving by other modes. Based on these percentages, it is anticipated that of the 80 pupils, 68 students would arrive by bus/minibus. Given that 1 minibus is able to carry 8 passengers this equates to 9 minibuses. Eight pupils would arrive in a private car/van giving a total of 17 student vehicle movements.

As mentioned above the school would employ 66 members of staff, 53 of which will be full time and 13 as part time. This gives a full time equivalent of 60 members of staff. Based on travel behaviour at Grangewood School, it is anticipated that 32 of the 66 members of staff will arrive at the site by private car. Adding pupil and staff car trips together (17 + 32) gives a total of 49 vehicular movements. However, elsewhere in the Transport Assessment it is reported that the forecasted traffic generation for vehicles would be 66 vehicles. The Highway Authority has raised this discrepancy between these figures with the applicant who has undertaken to provide a Technical Note clarifying the matter. This is still being awaited upon.

The Transport Assessment is also inconsistent regarding the times between which staff will arrive for work, 08:00 to 08:30 hours and 07:30 and 08:30 are both times quoted. The Transport Assessment also makes an unrealistic assumption regarding the rate of staff arrivals, it assumes that staff will arrive for work at regular intervals. For the 08:00 to 08:30 arrival window it is assumed that one staff vehicle would arrive every minute and for the 07:30 to 08:30 arrival window it is assumed that one staff car would arrive every two minutes. If staff vehicles were to arrive at regular intervals over either arrival window then the impact on the highway network would be less as there would be no peak arrival time. This assumption is considered flawed. There are any numbers of reasons why staff vehicles will not arrive at regular intervals, these range from a staff member leaving for work early or later than planned to the amount of delay they experience on their journey. The Highway Authority has contacted the applicant requesting that the staff vehicle arrival rate is reviewed as trips will not be evenly distributed. Assuming that they are evenly distributed does not provide a real world representation of the impact that the development would have on the highway network. The Highway Authority has requested that trip generation is provided at 15 minute intervals to give a clearer indication of what the impact of the development would be on the surrounding highway network. Given that vehicular entrance to the school is just 15 metres away from the junction of Ballinger Way and Broadmead Road there are currently concerns that queues of vehicles waiting to enter this school will form tailing back and blocking this junction. This would impede the free flow of traffic and be inconsistent with the Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT 1: Managing Transport Impacts - road safety and Policy DMT 2: Highway Impacts - traffic congestion

As discussed the Highway Authority has reviewed the Transport Assessment and found it to be fundamentally flawed. It is inconsistent and makes unrealistic assumptions. As presented the trip generation figures are unreliable, as this data has been used to assess the performance of

junctions with the development the results of this modelling are be inaccurate. The Highway Authority withholds its final comments pending receipt of the information requested.

Further Highway Engineer comments following the submission of the Transport Addendum Note:

Further to my colleagues previous comments where concerns were raised with regard to trip generation and the anticipated impact along the nearby junction not being fully assessed, the applicant has now submitted a Transport Addendum.

Trip Generation

With regard to trip generation, the Transport Assessment had highlighted that the site would employ 66 members of staff (60FTE) and that based on travel behaviour at the Grangewood School it was anticipated that only 32 members of staff would arrive at the site by private car. This, in addition to the 17 traffic movements derived from the pupil trips would total 49 traffic movements. Although the TA had based its trip rate calculations on the 66 members of staff only, the addendum has now revised this to the correct total of 49 trip rates.

Junction Impact

In order to assess the impact of the overall trips and capacity at the nearby Broadmead Road/Ballinger Way junction the Transport Assessment had carried out a 'one hour' profile tab (08:00-09:00), however given the very nature of the proposals in that the school start time would be no later the 8:45 it would be understood that all staff and pupils would arrive before this time. The applicant has therefore carried out direct modelling profile at the junction which allows for the junction capacity to be assessed over each 15 minute time segment in the peak hour.

Although table 1 of the addendum has assumed its percentage distribution on the school start and finish times within the respective peak hour, the percentage for the 08:15-08:30 time period is disputed as the submissions assume that 50% of staff as well as 50% of students will arrive to the site at the same time. Given the very nature of the school it is expected that the majority of staff will arrive to the site before 08:15 in order to see pupils into the building. A higher percentage during the 08:00-08:15 time period is therefore expected.

Notwithstanding the above, the modelling undertaken shows that the junction will be operating well within capacity and even if there were to be an increase in trips during the 08:00-08:15 time segment, would not result in operational capacity issues.

Overall, whilst there is a concern with regard to staff profiling, there will be no material change to the modelling undertaken. However, in order to mitigate the change of the staff profile, it is requested that a condition be stipulated ensuring that the school as part of the School Travel Plan works with Hillingdon Councils School Travel and Road Safety team on an ongoing basis and work towards the TFL Travel Plan accreditation.

Mindful of the above, should you be minded to approve, I would have no objections subject to the conditions/obligations already stated.

Tree / Landscape Officer:

This site is occupied by an former industrial land, now vacant and hoarded, at the junction of Broadmead Road and Ballinger Way / Arcon Drive. The site is bounded to the south and east by public open space. There are no TPO's or Conservation Area designations affecting the site. The site lies within designated Green Belt land, with residential areas to the north and west. There is a designated Nature Conservation Site of Metropolitan or Borough Grade 1 Importance located to the south of the site.

Comment:

The site has been the subject of a number of pre-application meetings and advice from the LPA. A tree survey by Ecology Link has identified four individual trees or groups which are on, or close to, the site. T1 a 'B' grade sycamore and G1 ('C' grade apples) will be removed to facilitate the development. G2 (a mix of 'C' grade trees and G3 ('A' grade white willow) are off-site / close to the western edge. Only the off site group of White willow ('A' grade) will be retained. All other trees will be removed to facilitate the development. Since the White willows (G3) are beyond the site boundary, they will effectively be protected by the site hoardings and should not be affected by the construction-related activity.

An extended Phase 1 Habitat Survey has been undertaken by Ecology Link. The report concludes that further specific surveys may be required (section 5.0) but makes no specific site recommendations due to the lack of any available designs / plan proposals (section 4.10). The scheme is supported by a landscape report / D&AS, by Colour (landscape consultants), dated March 2020. The report explains the boundary treatments and zonal planning which specifically addresses the personal safety, operational management and educational needs of a SEND school. The car park fronting onto Broadmead Road and much of the Arcon Way frontage will be soft landscaped to provide a warm welcoming boundary and mitigate the effects of the required 2.4metre high security fencing. Other soft landscaped zones include: a food and horticultural garden, internal planted courtyards, an art and music garden, passive external spaces, and a habitat / activity trail area. The arrangement of the external spaces within the site has been organised to ensure that the green open spaces have been located along the Green Belt boundary. The built development incorporates a large shallow-pitched, south-facing green roof on a single-storey building which faces the Green Belt. This is an attractive and sensitive landscape layout which reflects the design brief discussed at pre-application stage.

Recommendation:

There is no objection to the proposals subject to pre-commencement condition COM9 (parts 1, 2, 3, 4, 5 and 6).

Sustainability Officer:

Any approval would require:

- 1 - Standard energy condition requiring 35% saving of carbon emissions.
- 2 - Standard ecological enhancement condition
- 3 - Condition requiring reptile surveys - prior to commencement with appropriate method statements and mitigation to be agreed with the Council.

Water and Flood Management Officer:

The proposals to manage drainage on the site include a proposal to discharge at 4.25ls which is not the required greenfield run off rate of 1.4ls for the 0.85 ha site. The site will need to reduce the run off to 1.4l/s to ensure it is policy compliant. The proposals appear to suggest that this storage to control the flows of water within the site will be through a variety of methods including Greenroof, filter strip, permeable paving as well as tank. However there are further opportunities that this design is missing to ensure the most sustainable scheme. Discounting "rain gardens" and above ground conveyance due to limited space is an inadequate explanation. Any School should incorporate Suds in a way that benefits the education and follows recent GLA guidance on Suds in Schools <https://www.london.gov.uk/what-we-do/environment/climate-change/surface-water/suds-sector-guidance> It would be appreciated to have discussion to maximise opportunities for rain gardens along the access roads, protecting pupils from air pollution and wider footpath to facilitate walking and cycling and trees integrated within the car parking areas to shade and reduce the urban heat island impact.

Access Officer:

The Design and Access Statement and plans have been assessed with reference to Building Bulletin 94: Inclusive School Design, DfEE, 2001, Access for disabled people to educational buildings, Dept. of Education and Science, 1984 and Accessible Schools: Planning to increase access to schools for disabled pupils, 2002. No accessibility concerns are raised with the exception of the following observation for which an amendment is strongly recommended. 1. Room G-027 Laundry should be relocated to allow room G-028 hygiene to be enlarged to 12m². A revised plan should be requested if the principle of development is acceptable to the council. Conclusion: no objection is raised from an accessibility perspective.

Contaminated Land Officer:

Summary of Comments:

I have reviewed the following documents as submitted with the application:

- Title: Supplementary Phase II Geo-environmental Assessment Report - Proposed Grand Union Village SEND School; Ref: C2923/PII; Date: 15.01.2019; Prepared by HSP Consulting Engineers Ltd
- Title: Ground Investigation Report; Ref: 23-20-19-1-1000/GIR1; Date: 26 July 2018; Prepared by: Hamson Barron Smith Ltd

Details of a phase I study, including a land use history using historical mapping of the site and its surroundings, are outlined within the report produced by Hamson Barron Smith Ltd. The details provided a suitable platform to develop and inform the subsequent site investigations.

The most recent updated conceptual site model (CSM), produced within the supplementary geo-environmental assessment report by HSP Ltd, identifies on-site and nearby off-site sources of contaminants, which include isolated occurrences of lead and asbestos, which the reports indicate are likely to have originated from shallow infilling of the historic brickfields, in conjunction with the presence of identified made ground materials from "Contemporary Land Use" at the site.

The risk assessment within the updated CSM is given as Very Low to Low in terms of contaminants identified during laboratory analyses of samples taken from site during investigation works.

However, a section of the HSP report (prior to the updated CSM) indicates an elevated percentage volume/volume (6.8%) and flow rate (3.2 l/hr) of carbon dioxide (CO₂) detected during a sequence of scheduled gas monitoring visits.

The results of a subsequent calculation identified a Characteristic Situation 2 (CS2) category, which represents a low risk classification. However, CS2 indicates remedial action is necessary, with a requirement for two levels of protection to be incorporated during construction of floors within ground floor areas of the proposed new building/s.

In accordance with stated findings and recommendations within the above report/s, details are now required in order to clearly identify suitably designed, site-specific, ground gas protection measures which are to be implemented.

I therefore recommend the following conditions should be imposed on any award of planning permission in favour of the application:

1. The development shall not commence until a scheme to deal with identified ground gas issues has been submitted to and approved by the Local Planning Authority (LPA). All works which form part of the required remedial measures shall be completed before any part of the development is occupied or brought into use unless the 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) A written method statement shall be required to provide details of the proposed gas protection measures, including validation of the same. The method statement will also identify how completion of the works will be verified. The information shall also include proposals for a watching brief to address any undiscovered contamination. All shall be agreed in writing with the LPA prior to commencement, and no deviation shall be made from the proposed schemes without the express agreement of the LPA prior to its implementation.

(ii) If during remedial or other development works contamination not addressed in the submitted details is identified, then an addendum to the proposed methodology/remedial scheme shall be agreed with the LPA prior to implementation; and

(iii) Upon completion of the approved 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 installed protective measure/s and their verification to show that the works have been carried out in full and in strict accordance with the approved methodology.

Reason:

The Council is aware of the presence of land, situated on and in proximity to the subject site, with the potential to emit gas. It is expected the installed gas protection measures will ensure that risks from gas migration to the future users of the property are minimised

2. 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. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority.

Reason:

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

Observations:

- Two recent reports (dated 2018 and 2019), produced separately by HSP Ltd and Hamson Barron Smith Ltd, identify historical contaminative uses, including two docks and wharf, two canal docks, brickfields and clay fields present at the site.

- The reports also provide details of two separate Phase II site Investigations conducted during 2018 and 2019.

- The reports offer suitable and sufficient information in terms of preliminary and updated conceptual models, risk assessments and other relevant information for the site.

- Each of the above submissions also refer to further supportive information presented in earlier reports produced by Wardell Armstrong Ltd, comprising details from two more site investigations and a remediation strategy, dated 2000, 2001 and 2002 respectively. It is stated the Wardell Armstrong findings relate to a wider area of the Grand Union Village residential development.

Air Quality Officer:

The proposed development is not within a Focus Area and has a trip generation of 66 two-way vehicle trips during both the school opening and closing time periods.

GUV School is proposed on land to the southeast of the junction of Broadmead Road and Ballinger

Way within the London Borough of Hillingdon (LBH). The land measures approximately 1.75 acres and is designated as Green Belt although there was a previous sports club building on the site which has now been demolished.

The proposed development will include provision for 48 car parking spaces and it is anticipated that there would be a maximum of 10 vehicle movements a day, resulting from staff working in the proposed building.

As such, potential air quality impacts associated with operational phase road vehicle exhaust emissions are predicted to have an insignificant effect.

However, given the possible impact on existing focus areas due to inherent vehicle movements and traffic distribution associated with the operation of the school, an Air Quality condition is required to develop and implement a Low Emission Strategy. In addition, GLA's construction condition is required. See text below.

Condition Air Quality - Low Emission Strategy

No development shall commence until a low emission strategy (LES) has been submitted to and approved in writing by the Local Planning Authority. The LES shall specify ways to manage air pollution emissions to conform with the following:-

1) No idling on school grounds or ways of access to the school entrance;

2) Implementation of suitable measures from the Mayor of London's Schools

Air Quality Audit Toolkit demonstrating a clear steer towards an air quality positive approach and demonstrate the project's commitment to ensuring a high level of sustainability. The measures are to include but not be restricted to the provision of 10 electric vehicle charging points, as well as behavioural measures such as walking, car sharing, cycling and anti-idling campaigns, and the provision of green roofs and planting.

The strategy shall detail the steps that will be followed in delivering the emission reduction/mitigation measures listed a plan indicating when this measures will be implemented. Measures will be updated in agreement with the local planning authority as needed;

3) a clear and effective strategy to encourage staff and pupils of the school to:-

a) use public transport;

b) cycle / walk to work where practicable;

c) enter car share schemes;

d) purchase and drive to work zero emission vehicles.

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

Reason:

As the application site is within an Air Quality Management Area and to reduce the impact on air quality in accordance with policy EM8 of the Local Plan: Part 1 (November 2012), policy DME1 14 of the emerging London Borough of Hillingdon Local Plan (part 2), London Plan Policy 7.14, Mayor's Intent to Publish London Plan Policy S11, and paragraph 170 of the National Planning Policy Framework (2019).

Conditions - Reducing Emissions from Demolition and Construction:-

Control of Dust and Emissions Plan

A No development shall commence until a Control of Dust and Emissions 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).

B 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 4.2.3.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

7. MAIN PLANNING ISSUES

7.01 The principle of the development

This proposal seeks the construction of an 80 place SEND primary school on open Green Belt land on the eastern side of the borough, close to the borough boundary with Ealing. All of the proposed development site and the surrounding land to the south and east is designated as Green Belt.

EDUCATIONAL FACILITIES

The proposed SEND school would provide educational facilities primarily for children with severe learning difficulties, including children with autism spectrum conditions, and for a smaller proportion of children with profound and multiple learning difficulties.

Paragraph 94 of the NPPF states that planning authorities should take a proactive, positive and collaborative approach to ensuring a sufficient choice of school places, giving great weight to the need to create, expand or alter schools and need to work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted (in this case, the scheme was subject to a pre-application enquiry). London Plan Policy 3.16 and the Mayor's intend to publish London Plan Policy S3 both seek to ensure a sufficient supply of good quality educational choice to meet the demands of a growing population and enable local communities. Paragraph 5.3.6 of the Mayor's intend to publish London Plan states that there is a need for an increase in SEND provision in London, including some provision within specialist schools. Such facilities should meet the highest standards of inclusive and accessible design.

The Council's Local Plan: Part 1 - Strategic Policies (November 2012) at paragraph 9.49 highlights that the capacity of existing school sites is becoming increasingly limited and that these 'very special circumstances may necessitate the release of greenfield or Green Belt sites'. Such sites will only be identified where the need for additional forms of entry cannot feasibly be met through the expansion of existing schools or new development on suitable brownfield land. Broad support for the development of new schools to satisfy need is also included within Policy C12 of the Local Plan Part 1.

The Council's Local Plan Part 2 includes policy DMCI 1A 'Development of new educational floorspace' which sets out detailed criteria for the assessment of such proposals. These criteria include taking account of the compatibility with surrounding uses and existing planning policy designations, the impact on the provision of open space and the location and accessibility of the site.

Hillingdon currently only has SEND provision within one school to the north of the A40 which is oversubscribed and there is growing demand for specialist SEND provision. This is considered in greater detail within the 'Very Special Circumstances' section below.

However, the school would be located on Green Belt land and here, despite planning policies being very supportive of new educational development, the scheme would have to be able to satisfy Green Belt policy and the very strong presumption against inappropriate development.

Green Belt

The NPPF (February 2019) at paragraph 133 advises that Green Belts are of great importance and their fundamental aim is to "prevent urban sprawl by keeping land permanently open". Paragraph 143 goes on to advise that "inappropriate development is by definition, harmful to the Green Belt and should not be approved except in very special circumstances". The NPPF continues at paragraph 144:-

"When considering any planning application, local planning authorities should ensure that substantial weight is given 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 resulting from the proposal, is clearly outweighed by other considerations."

The NPPF provides that construction of new buildings should be regarded as inappropriate save for certain limited exceptions set out in paragraph 145, namely:-

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Paragraph 146 advises that certain other forms of development are also not inappropriate in the Green Belt

provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

- a) mineral extraction;
- b) engineering operations;
- c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- d) the re-use of buildings provided that the buildings are of permanent and substantial construction;
- e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- f) development brought forward under a Community Right to Build Order or Neighbourhood Development Order.

London Plan Policy 7.16 and the Mayor's intend to publish London Plan Policy G2, re-emphasis national policy and strongly resist inappropriate development of the Green Belt. National and regional policy guidance is also reiterated at the local level by Policy EM2 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and Policy DMEI 4 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) which states:-

"Inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted, unless there are very special circumstances."

EXCEPTION TEST

The applicant has referred to the footprint of the former Taylor Woodrow Sports and Social Club that occupied part of the site and claims that the site therefore constitutes previously developed land. However, both the LPA and the GLA do not accept this position as of the former sports club, only approximately 720 sq.m. of hard standing remains visible on site following its demolition prior to 2000 and much of the site is largely overgrown and similar in appearance to the rest of the adjacent Green Belt landscape. The NPPF definition of previously developed land specifically excludes land "that was previously developed but where the remains of the permanent or fixed surface structure have blended into the landscape" and therefore, the majority of the site does not meet the definition of previously developed land and the proposed development would clearly have a greater impact on the openness of the Green Belt than the existing development. The applicant has also referred to the planning history and the 2002 outline planning permission (reference: 327/APP/2000/2106) for the wider site and the new sports hall and sports facilities that were proposed for this site as justification. However, the proposed sports hall was never built and the circumstances that justified the granting of permission back then, including the removal of existing sports and changing room buildings from the wider site and replacement of these facilities within a single leisure complex building of a similar overall size on this site was considered to be appropriate in Green Belt policy terms. The previous justification is therefore not comparable with the existing situation. The proposed development is therefore not considered to fall within any of the NPPF exceptions listed in paragraphs 145 and 146.

The development is therefore inappropriate and, by definition, harmful to the Green Belt and policy dictates that inappropriate development should not be approved except in very special circumstances which 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.

IMPACT ON OPENNESS

The site has been vacant since the former sports club was demolished over 20 years ago and the only visible evidence of it on site is a small area of hardstanding (approx. 720sq. m.) which has not been overgrown. The proposal would introduce a single storey building with double height elements with a 2,410sq.m footprint and 2,300sq.m of associated car parking and hardstanding and outdoor play areas into the Green Belt. As compared to the existing 720sqm of visible hardstanding on site, the proposed overall built footprint (buildings and hardstanding) of the scheme would amount to 4,710sq.m, an approximate increase of 654%.

Although it is acknowledged that the scheme has been kept to a minimum whilst still satisfying relevant government guidelines for this type of school (in terms of GIFA, the proposal at 2,410 sq.m is only just above the minimum requirement of 2,380 sq.m. as set out in Building Bulletin 104 (BB104), which are the main guidelines for the design of SEND schools), the introduction of buildings and hardstanding will detrimentally impact

the openness of the Green Belt and it is considered that this is significant given the visual and spatial break that the site has the potential to provide within the built up frontage of Broadmead Road (notwithstanding the fly tipping and existing hoarding) and the views permitted across the site to the wider Green Belt and Grand Union Canal (although it is noted that GLA officers consider the harm to openness to be 'moderate and less than substantial'). As such, very special circumstances would need to be demonstrated to outweigh the harm. The case for very special circumstances is considered below.

The applicant has considered various options to reduce the impact of the building, including a basement to accommodate vehicle parking, thus reducing the amount of hardstanding but this would be considered not to be viable in this location and would result in extensive ramps that would offset the benefit of reducing the surface parking. The applicant has also considered reducing the footprint of the building through 2-storey and 3-storey options but increasing the height of the building would negate the benefits of a reduced footprint and with additional storeys, would have had negatively affected the inclusive design and access of the development. The preferred proposed scheme does incorporate a sloped sedum roof on the south eastern part of the building to act as mitigation of the development in views from the rest of the Green Belt. As such, both LPA and GLA officers do acknowledge that care has been taken to minimise the extent of built development.

IMPACT ON GREEN BELT PURPOSES

Paragraph 134 of the NPPF sets out five purposes for including land within the Green Belt:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It is important to consider the extent to which a proposal conflicts with any of these. It is acknowledged that (d) and (e) are not relevant to this application. LPA and GLA officers consider that there would be some conflict with purposes (a) and (c) because the reduction in openness would result in some limited urban sprawl and encroachment into the countryside. It would also impinge on the separation between Yeading and Southall (purpose (b)), albeit in places, including to the immediate west of the site, these settlements already merge and there would still be a strategic gap maintained in this location by the remaining Green Belt. This limited harm to Green Belt purposes also needs to be weighed in the balance.

VERY SPECIAL CIRCUMSTANCES

As set out above, there would be harm to the Green Belt by reason of inappropriateness, harm to openness (significant, although GLA officers consider this to be moderate) and conflict with Green Belt purposes (limited).

The applicant has set out a case for very special circumstances, which can be summarised as:-

- the need for a specialist SEND school within the borough
- there are no other sequentially preferable sites (I.E. not within Green Belt, or on preferable Green Belt sites) available for development
- the site is currently inaccessible to the general public whereas the new school would be open for community use; and

- the development would enhance the biodiversity and urban greening of the site.

- Need for a SEND School

Hillingdon currently has only one specialist SEND school, Grangewood in Eastcote in the north of the borough. Education Services advise that currently, all specialist provision in the Borough is full to capacity and significantly oversubscribed and that demand is rising, particularly amongst those of primary school age and the Local Authority will be commissioning all 80 places. With Grangewood School being three miles north of the A40, some pupils have over an hour's mini-bus journey twice a day which is not good practice for such vulnerable pupils and prevents close contact with parents. As such, this proposal is considered vital to meet specialist demand south of the A40 and the additional provision will enable Hillingdon to meet demand from the north and south, and have two distinct catchments.

GLA officers also recognise the need for the facility, advising that although Hillingdon's SEND provision was expanded within conventional schools between 2012 and 2014, some SEND pupils require specialist facilities due to the severity of their needs and its only specialist school, Grangewood has capacity for 88 pupils but currently has 110 pupils on role with a waiting list. The borough also had an increase of 18% of pupils with an Educational and Health Care Plan (EHCP) which will include children requiring specialist SEND provision and proposal would provide specialist SEND provision in the south of the borough.

The LPA and GLA officers consider that it has been adequately demonstrated that there is a genuine need for a specialist SEND school, particularly in the south of the borough. Paragraph 94a of the NPPF attaches great weight to the need to create new schools. The proposal therefore could represent a very special circumstance, subject to the applicant demonstrating that there are no sequentially preferable sites available that could accommodate the new school.

Sequential Site Assessment

The application has been accompanied by a Sequential Site Assessment (SSA) to assess whether any non-Green Belt sites, or sequentially preferable Green Belt sites could accommodate the proposed development. The assessment identified the following search criteria:-

- the site must be located in the south of the borough, between the A40 in the north and Heathrow Airport to the south;
- the site must be at least 8,370sq. m. in area;
- the GIFA must be no lower than 2,380 sq. m; and
- the site must be able to accommodate the school on a single floor level or with limited elements of staff accommodation at first floor.

GLA officers advise that as Ealing has limited additional capacity and could not accommodate the additional SEND need in Hillingdon whilst also meeting its own future needs, for SEND pupils, the assessment, particularly restricting the search to within the borough, is considered to be sufficiently robust. The GLA consider that further information should be submitted regarding the Green Belt site at the former Pield Heath Nursery as they do not accept the argument that the application site has a greater extent of previously developed land. Although the former Pield Heath Nursery site does have some wider site constraints such as the wider site comprising of woodland which is protected as a SINC the area of the garden centre could accommodate a school. They also noted that the Hayes Bridge, Uxbridge Road site (ref. SA 36) at 8,000sq. m was only marginally beneath the 8,370 sq. m threshold set, but as the site is constrained on all sides, including the major A4020 Uxbridge Road to the south, the site would be affected by significant

traffic and air pollution and the application site was therefore not considered to be beneficial in this respect. The GLA also advise that the Council should also apply its own knowledge of local sites to review the assessment, but at present, there is insufficient information within the SSA to conclude that no sequentially preferable sites are available.

The Council's Policy Officer is satisfied that the property search undertaken as the first part of the SSA did not identify that there were any sites of sufficient size currently available either in part (ground floor) or as a whole to accommodate the school.

The second part of the SSA focused upon site allocations in the Local Plan and whilst the majority of the findings are agreed, there are two sites which require further investigation, Nestle Site B which has a specific allocation for an education use and part of Site SA28 (St Andrew's Park) where the Battler of Britain Club has the potential for redevelopment from one vacant community use to another.

In their letter dated 30/7/20, the applicants advise that as regards the Pield Heath Nursery site, this is owned by Brunel University London (BUL) and has a current temporary use to provide hospital parking. It is clear from Local Plan Part II submissions by GVA, acting for BUL, the Hillingdon Hospitals NHS Foundation Trust and the Central and North West London NHS Foundation Trust that the land owners have their own plans for the site within the plan period. There is no indication that this land is to be released by the current owners other than for a healthcare campus and the site is not on the market and therefore not available for a SEND school.

As regards Nestle Site B, the applicant advises that the site is in different ownerships and a minimum of 3 sites would have to be assembled to provide a site of sufficient size for the school. Furthermore, individual applications have been submitted on these sites and although these scheme have been dismissed at appeal, they do signal that the owners have their own plans for the sites, the expectation of which has not been dampened at appeal with the Inspector noting that an individual scheme would not prejudice the comprehensive development of the whole site. Even if the owners were not pursuing their own alternative development proposals, to assemble and deliver the site would be uncertain and lengthy, and take the delivery of the new school well past the point at which it is needed. It is also questionable if the site can deliver the school and the allocated quantum of 300 new units of housing based on the applications that have been submitted and that it is very likely that a mixed use building would be required and the DfE are not permitted to construct buildings other than schools so a joint venture with another developer would have to be entered into which is a complex and lengthy process, pushing the timescales out for delivery to probably 3 to 4 years.

In terms of the Battle of Britain Club, the applicant advises that at 3,500 sq. m. the site is substantially below the BB104 recommended minimum set out in the search criteria and 5,000 sq. m. below the proposed site.

Council officers are content with the explanation as to why the Nestle site and the Battle of Britain Club have been discounted. It will be for the GLA to advise on the Pield Heath Nursery site in their Stage 2 Report.

Education Services have confirmed that the need for 80 extra places for pupils with complex needs and autism could not be met by expansion or redevelopment of any existing school site, and they consider that all non-Green Belt options have been fully explored and no sufficient site was found in searches.

Community use of the school

The proposed development will result in the loss of public open space which is contrary to Policy DMCI 3 of the Local Plan: Part Two. To mitigate this loss, the applicant has offered facilities such as the school hall and the hydrotherapy pool to the local community for use outside of school hours. Part of the application site has been hoarded and therefore inaccessible to the public but there is 2,340 sq. m. of the application site that does currently form part of the public open space. Whilst the use of the school facilities is welcomed, it is required to mitigate other planning harm arising from the development and therefore can only be given very limited weight as a very special circumstance.

Biodiversity and urban greening

The applicant has suggested that very special circumstances are demonstrated by improved biodiversity and landscaping on the site. The applicant has introduced landscaping to the southeast of the site, as well as an extensive green roof that would reduce the visibility of the proposal from the Green Belt. However, the GLA advise that the scheme does not clearly demonstrate there would be an improvement in biodiversity and urban greening as a result of the development and further clarification is needed. However, biodiversity and urban greening improvements of the extent proposed are unlikely to constitute very special circumstances to justify the development in isolation but could be given some weight if a high quality landscaping scheme could be achieved.

Conclusion

The proposed development represents inappropriate development with the Green Belt, contrary Paragraph 144 of the NPPF (2019), Policy 7.16 of the London Plan, the Mayor's intend to publish London Plan Policy G2 and Policy DMEI 4 of the Local Plan, Part Two. Significant weight against the development is attached to the harm that will be caused to the spatial and visual dimension of the Green Belt, which will be detrimental to its openness and more limited weight is attached to the harm by reason of conflict with the purposes of inclusion of the land within the Green Belt.

However, the applicant has been able to put forward very special circumstances and significant weight should be attached to there being an acute need for additional primary SEND provision in the south of the borough and that there is a lack of alternative non Green Belt and sequentially preferable Green Belt sites (although the GLA needs to confirm that the former Field Heath Nursery site has been demonstrated to be genuinely unavailable). However, only very limited weight can be given to the community use of the school and on improved biodiversity and urban greening grounds.

LOSS OF PUBLIC OPEN SPACE

Some 2,340 sq. m. of the rear part of the site currently forms part of the larger area of public open space.

The NPPF at paragraph 97 states that:-

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

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) 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
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.'

Policy 7.18 reiterates that the loss of open spaces must be resisted. Where the loss of

open space is proposed it should be replaced by equivalent or better quality space within the locality and that the replacement of one type of open space with another will not normally be considered acceptable.

Policy EM4 the Hillingdon Local Plan: Part One (November 2012) states that the Council will:

"safeguard, enhance and extend the network of open spaces" and that "there will be a presumption against any net loss of open space in the Borough."

Policy DMCI 3 of the Local Plan: Part Two also states that:-

"Public open space will be protected and enhanced and development will only be permitted where:

- i) it is linked to the functional use of the open space; and
- ii) it does not harm the character, appearance or function of the open space."

The site is not designated as a protected open space within the Development Plan. However, Hillingdon's Open Space Strategy 2011-2026 confirms that "Open Space should be taken to mean all open space of public value, [not just including land], which offers important opportunities for sport and recreation and can also act as a visual amenity." Accordingly, it identifies the site as being used for Outdoor Sports (although the site is not shown as being publically accessible, perhaps reflecting the previous use of the wider site by Taylor Woodrow).

As mentioned above planning policy at local, regional and national levels all place importance on the protection and retention of open space and indicate that developments which involve the loss of open space should normally be resisted and only be allowed in exceptional circumstances. In this respect the policy tests are similar to those relating to the loss of green belt land and the question which must be answered is whether special circumstances exist that would outweigh the harm caused by the loss of open space.

The Open Space Strategy seeks to provide an understanding of the current and future supply and demand for open space; develop local standards and allow the identification of areas of deficiency; identify opportunities to address these deficiencies; and identify open spaces for improvement. The strategy identifies deficiency in access to small - metropolitan level open space and district level open space and the area surrounding the application site is not identified as being deficient in either respect.

A very small area of the Yeading ward to the south of the application site is identified as having some deficiency in terms of accessing district and metropolitan open space. However, the proposal would not reduce the provision of open space of this type.

While the proposal would reduce the level of currently accessible public open space by 0.23 ha, the large majority of the approximately 22.5 hectares of public open space to the west of the Grand Union Canal would remain for use by the public and in a strategic and spatial sense the proposal would not have any significant impacts on the availability, accessibility, type or quality of open space within the vicinity.

Sport England have been consulted on the application and they do not raise any objections to the proposal, although they do advise that any community use is secured through a Community Use Agreement. (This would be secured by condition).

As discussed above the educational need for an additional school is clear and compelling and it is considered that this need outweighs the minor harm which would be caused by the loss of 0.23ha of open space in this location. It is considered that special circumstance exist which justify the loss of this open space in accordance with the NPPF, Policies 7.18 of the London Plan, Policy EM4 of the Hillingdon Local Plan: Part One and Policy DMCI 3 of the Local Plan: Part Two.

Impact on Openness

The proposal would see the introduction of a single storey building with double height elements, associated car parking and outdoor play areas into the Green Belt. The applicant has demonstrated that the overall footprint of the development has been kept to a minimum whilst still satisfying the minimum recommended government guidelines for a school of this type. Regardless of size, it is acknowledged that the introduction of built structures onto this open land will impact on the openness of the green belt. This harm is considered to be significant given that it will reduce the visual and spatial break afforded by the site as a transition point between the existing built up area and wider area of Green Belt within which the site is situated.

However, as evidenced by the verified views that have been produced, the school would be mainly viewed within the Green Belt to the east against the back drop of typically two and three storey residential development and from the larger expanse of Green Belt land to the south, the school would largely be screened by the existing spoil mound. As such, the school building would only have a fairly limited impact on the openness of the Green Belt from longer views and with the careful design of the building, including its single storey accommodated under a shallow sloping sedum roof, play areas, landscaping and use of more rural materials, its impact will be reduced within closer views. The 2.4m security fence should allow views through into the well landscaped site, the details of which would be controlled by condition. It is considered that this overall layout of the school would enable a successful transition from the open Green Belt to the built form and enable a softer interface thereby reducing its impact.

There will be greater impact to the front of the site where the building will appear more prominent and there will be a large expanse of hardstanding in the form of car parking and the provision of a 2.4m high security fence around the whole perimeter of the site. The site will no longer read as forming the edge of the Green Belt, but the scheme does provide a wide landscaped strip with tree planting along the frontage and there will be landscaped areas provided in front of the building. Further opportunities should be taken to enhance the landscaping, particularly in the form of tree pits in between the parking spaces (which are shown on some of the plans). However, the building will harmonise and sit quietly amongst the rest of the built-up frontage along Broadmead Road. This is proposed to be secured through the landscaping condition.

Conclusion

Overall, it is considered that there is a compelling need for a new SEND school and that there are no alternative sites which could be used to provide an appropriate facility. It is considered that the educational need represents very special circumstances and that on balance this need outweighs the harm which would arise from the development in other respects, including through loss of open space by reason of inappropriateness.

7.02 Density of the proposed development

Not relevant to the consideration of this proposal.

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

The application site does not form part of nor is it sited on the edge of a conservation area or an area of special local character. There are also no statutory listed or locally listed buildings within the vicinity of the site. The site also does not form part of an

Archaeological Priority Area and GLAAS have confirmed that as this land was used as a brickfield in the 19th century, this suggests that it has very low archaeological potential and no further assessment or conditions are necessary.

The scheme would therefore be unlikely to harm any heritage asset.

7.04 Airport safeguarding

No airport safeguarding concerns are raised by this application.

7.05 Impact on the green belt

This is assessed in Section 7.01 above.

7.07 Impact on the character & appearance of the area

Policy DMHB 11 requires all development to be designed to the highest standards and incorporate principles of good design, including harmonising with the local context; use of high quality building materials and finishes; internal design and layout maximises sustainability and is adaptable; protects features of positive value and their settings and includes landscaping and tree planting. Proposals should also not impact upon the amenity, daylight and sunlight of adjoining properties and open space, development does not prejudice the development of adjoining sites and appropriate provision is made for the storage of waste and recycling.

Policy DMHB 12 re-iterates Policy 11 by stating that development should be well integrated with the surrounding area and be accessible by improving legibility and promote routes and wayfinding between the development and local amenities; public realm design takes account of the established townscape character and quality of the surrounding area; includes landscaping that is suitable for the area; makes provision for the safe and direct movement of pedestrians and cyclists; incorporates appropriate and robust hard landscaping; incorporates public art where appropriate and incorporates inclusive design. Public realm improvements will also be sought from developments close to transport interchanges and community facilities.

The application site, although within the Green Belt, forms a prominent corner plot in an area of new residential development that is characterised by houses and flats that range in height between 2 and three storeys.

The Council's Conservation and Urban Design Officer advises that the building has been designed sensitively taking into consideration its location having effectively been split into two portions respecting the different interfaces. The front portion responds to the more urban frontage of Broadmead Road and Ballinger Way with a brick frontage whereas the rear portion responds to the Green Belt with softer timber clad elevations and a green roof. This approach taken with the low building height of one / one and a half storeys would allow the building to sit quietly within both the urban and Green Belt settings.

The officer goes on to advise that the building appears to be of a high standard of design and no objection is raised to the design and layout of the new school building. However, the officer advises that the large expanse of parking to the west of the school creates an unattractive hard landscaped area which detracts from the setting of the new school building and therefore additional soft landscaping should be introduced to help reduce its impact by creating a softer setting to the school and allow it to sit more quietly within the Green Belt. The landscaping of the scheme has been conditioned. The impact of the 2.4m high boundary enclosure will be set back from the road frontage allowing landscaping to be provided in front and behind the structure.

The LPA considers that the success of the scheme will be dependent on the finer detailing, choice of materials and workmanship. Should the application be minded for

approval then it is recommended that conditions be attached requesting samples of all external materials and detailed drawings of the, windows, doors railings and roof weathering details and covered walkways.

The GLA in their Stage 1 Report echo the Council's Design Officer's comments and state that the layout raises no strategic concerns and is supported and that the proposed sensory garden /horticultural space, playing fields, playground, bikes trail and landscaping in the south eastern portion of the site create a strong buffer between the site and the remainder of the Green Belt.

7.08 Impact on neighbours

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

A Sunlight / Daylight / Overshadowing Report has been submitted in support of the application. This advises that any daylight or sunlight reductions to surrounding residential properties are within BRE guidelines and would therefore be un-noticeable to occupants.

The nearest residential properties to the application site are the flatted developments, Avon and Bridgewater Houses situated on the opposite side of Ballinger Way to the north east and the detached house at the end of the cul de sac to the south west, No. 11 Darris Close. The front elevation of the flatted blocks would be sited some 22m from the new school building whereas No 11 Darris Close has a blank side elevation facing the site which is sited some 32m from the nearest part of the proposed school building and the school building would also be partially screened by the spoil mound. There are properties on the opposite side of Broadmead Road to the north west, but these do not front Broadmead Road and the school building is set well back from the Broadmead Road frontage so that the nearest rear / side elevation of the properties opposite would be the side elevation of No. 1 Braunstan Drive, some 40m from the front elevation of the school building.

With such relationships to surrounding residential properties, there would be no adverse impact on their amenities in terms of loss of sunlight / daylight, undue dominance and loss of privacy, in accordance with Policy DMHB 11 of the Local Plan: Part Two.

Noise issues are considered at Section 7.18 of this report.

7.09 Living conditions for future occupiers

Not relevant to the consideration of this application.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Policy 6.3 of the London Plan (2016) requires development proposals to ensure that the impacts on transport capacity and the transport network are fully assessed.

Policy DMT 1 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner and to be acceptable, schemes are required to i) be accessible by public transport, walking and cycling; ii) maximise safe, convenient and inclusive accessibility; iii) provide equal access for all people; iv) adequately address servicing requirements and v) have no significant adverse transport or associated air quality and noise impacts on the local and wider environment. Policy DMT 2 seeks to minimise the impact of development on the surrounding highway with regards to traffic, air quality, noise, local amenity and safety.

Policy DMT 6 sets maximum parking standards for new development as outlined in

Appendix C Table 1 to facilitate sustainable development. A variation of these requirements may be acceptable when:-

- i) the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or
- ii) a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendation.

The policy also states that all car parks provided for new development will be required to provide conveniently located parking spaces for wheelchair users and those with restricted mobility.

The application is supported by a Transport Assessment, Travel Plan, Delivery and Servicing Strategy and a Parking Management Plan.

Trip Generation

The school would employ a total of 66 staff, of which 53 are to be full time and 13 part time to give a full time equivalent of 60 members of staff. Of these 32 would be full time Teaching Assistants and 14 full time Teachers. The Council's Highway Engineer has assessed the application and advises that in order to establish the profile of trip generation, data has been obtained from the 2011 Travel to School Census Dataset in combination with on-site observations at the existing Grangewood School in Ruislip and that this approach is acceptable. Based on the 2011 census data for pupils travelling to SEND schools within the borough, 84.8% arrived by bus/minibus, 10.2% by car/van, 2.4% walked to school with 2.6% arriving by other modes. Based on these percentages, it is anticipated that of the 80 pupils, 68 students would arrive by bus/minibus. Given that 1 minibus is able to carry 8 passengers this equates to 9 minibuses and eight pupils would arrive in a private car/van, giving a total of 17 student vehicle movements.

As regards staff, based on travel behaviour at Grangewood School, it is anticipated that 32 of the 66 members of staff will arrive at the site by private car. Adding pupil and staff car trips together (17 + 32) gives a total of 49 vehicular movements. Although the TA had based its trip rate calculations on the 66 members of staff only, the addendum has now revised this to the correct total of 49 trip rates.

The Highway Engineer also raised concern about the inconsistencies of staff arrival times which are required in order to assess the impact of the overall trips and capacity at the nearby Broadmead Road/Ballinger Way junction. The Transport Assessment had carried out a 'one hour' profile tab (08:00-09:00), however given the very nature of the proposals in that the school start time would be no later than 8:45, it is understood that all staff and pupils would arrive before this time. The applicant has therefore carried out a direct modelling profile at the junction which allows for the junction capacity to be assessed over each 15 minute time segment in the peak hour.

Although table 1 of the addendum has assumed its percentage distribution on the school start and finish times within the respective peak hour, the percentage for the 08:15-08:30 time period is disputed as the submissions assume that 50% of staff as well as 50% of students will arrive to the site at the same time. Given the very nature of the school it is expected that the majority of staff will arrive to the site before 08:15 in order to see pupils into the building. A higher percentage during the 08:00-08:15 time period is therefore expected.

The Highway Engineer concludes on the issue of trip generation that notwithstanding the above, the modelling undertaken shows that the junction will be operating well within

capacity and even if there were to be an increase in trips during the 08:00-08:15 time segment, this would not result in operational capacity issues.

Overall, whilst there is a concern with regard to staff profiling, there will be no material change to the modelling undertaken. However, in order to mitigate the change of the staff profile, a Travel Plan will be secured as a head of term.

Car Parking

The Highway Engineer advises that according to the Transport for London WebCAT service, the application site has a PTAL ranking of 1b (where 0 is the worst and 6b the best) indicating access to public transport is poor compared to London as a whole suggesting that there will be a strong reliance on the private car for trip making (although it is noted TfL record this site as having a PTAL of 2).

The proposal would include a total of 44 parking spaces. The Highway engineer advises that as regards car parking standards and Policy DMT 6 of the Local Plan, Part Two, 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. Where relevant, provision should be made for coach/bus access and parking.

According to the Transport Assessment, the majority, if not all pupils would be eligible for free school transport provided by London Borough Hillingdon. Most pupils would arrive at the school by minibus, only a handful of pupils are expected to be driven by parents. All pupils would be dropped off and picked up within the site, this is supported as it helps to minimise impact on the neighbouring residential streets. The proposals also include 2 minibus parking spaces and a 60 metre drop off and pick up layby at the front of the building which would be able to accommodate upto 9 minibuses. The Highway Engineer raises no objections to this arrangement or to the quantum of parking being proposed.

TfL also advise that with a total of 44 car parking spaces, this provision accommodates the expected demand of staff, visitors and parents. Therefore, the proposal is considered to provide the minimum necessary parking in line with Policy T6 of the London Plan (Intend to Publish 2019) and they welcome the suggestion that car parking spaces could be removed in future should they become surplus to requirements. They also advise that a Parking Management Plan (PMP) has been prepared to accompany the application and this should be monitored and reviewed as part of the Travel Plan which should set out how car parking could be re-provided as cycle storage in the future and that the PMP should be secured by condition. The PMP has been included as part of the Approved Documents condition and an informative is included in the officer's recommendation that details the revisions/ matters that would need to be included within the revised Travel Plan.

The Hillingdon Local Plan: Part 2 Development Management Policies (2020) and Policy 6.5 of the London Plan (Intend to Publish 2019) requires that 10% of parking spaces must be for blue badge holders, giving a total of 4 spaces whereas only 2 are proposed. The requirement for 4 accessible spaces is stipulated within the recommended landscape condition. The Highway Engineer also advises that the quantum of motorcycles, mopeds and scooters parking spaces proposed is policy compliant, these should be provided with anchor points to make them secure.

The proposal includes 10 car parking spaces which would be provided with Electric Vehicle Charging Points (EVCPs) and is acceptable. The remaining spaces would need to be provided with passive provision and this has been secured as part of the landscape

condition.

Cycle Parking

As regards cycle parking, the proposed provision of 8 long-stay cycle parking spaces for staff is considered appropriate, but in line with London Plan Policy T5 (Intend to Publish 2019), a minimum of 2 short-stay spaces should additionally be provided for visitors. This has also been secured as part of the landscape condition.

Travel Plan

Both the Council's Highway Engineer and TfL officers have advised of changes that would need to be made to the final Travel Plan. The need for the final Travel Plan is included as a Head of Term and the recommended alterations required to make it acceptable have been incorporated into an advisory informative.

Delivery and Servicing Plan

A Delivery and Servicing Plan has been submitted with the application. Deliveries will be accommodated outside of school start / finish times and waste collection will be undertaken as per existing collections from Ballinger Way. The Council's Highway Engineer and TfL officers advise that the plan is generally acceptable and accords with Policies T2 and T7 of the London Plan (Intend to Publish 2019).

Construction Logistics Plan

A Construction Logistics Plan (CLP) is also required which will need to be prepared in accordance with TfL's requirements. This forms part of the officer's recommendation.

In addition to the above, TfL also advise that before the application can be supported, the following areas or details will require further work:-

- The Transport Assessment (TA) should be prepared in line with TfL's Healthy Streets TA Guidance.
- An ATZ assessment should be submitted, including local bus stops as key destinations.
- The applicant should review the pedestrian access arrangements and ensure appropriate provision / mitigation is made, in line with London Plan Policy T2 (Intend to Publish 2019) and Vision Zero. This should include a new formal pedestrian crossing.
- Additional provision should be made for any school children who wish to cycle. The proposed supporting facilities should be shown on plan.
- The applicant should fully assess the impacts on the local public transport, walking and cycling networks to accord with Policy T4 (Intend to Publish 2019).

The applicant advises that pedestrian routes from the car park to entrance to be delineated and cycle parking to be laid out to London Cycle Standards could be dealt with by condition. These form part of the officer's recommendation.

As regards cycle showers and changing facilities, there is a staff shower/change room within the hydrotherapy complex. It is identified on the floor plan No. 2045_A-01-00. The room Number is G-047 and this would also be used for staff cycle change.

As regards the Active Travel Zone Assessment - the TA provides a healthy streets audit in the appendix - which utilises the ATZ methodology. We trust that this addresses this requirement.

As regards the comments raised by the London Borough of Ealing, the majority of these have been considered in this section of the report. The only exception to this is the request for an approximate contribution of £40,000 to improve pedestrian and cycle

infrastructure around the road network near the application site and introduce accident remedial measures on Broadmead Road which include junction improvement at the junction of Broadmead Road junction with Ruislip Road. Both the Council's Highway Engineer and TfL officers have assessed the application and have not raised the specific need for a financial contribution towards safety improvements (although the GLA are asking for a new pedestrian crossing on Broadmead Road which forms part of the Heads of Terms), therefore this has not been secured as part of this application.

Subject to the Heads of Terms and the recommended conditions, the proposal is considered to be acceptable on highway grounds.

7.11 Urban design, access and security

Security

A secure by design condition has been incorporated in the officer's recommendation.

7.12 Disabled access

Policy 7.2 of the London Plan and the Mayor's intend to publish London Plan Policy D3 seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum) ensuring that developments can be entered and used safely, easily and with dignity by all; are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; and are designed to incorporate safe and dignified emergency evacuation for all building users.

The Council's Access Officer has reviewed the proposal and the Design and Access Statement against relevant legislation and guidance and advises that there are no accessibility concerns although recommends that Room G-027 Laundry should be relocated to allow room G-028 hygiene to be enlarged to 12m². The applicant has responded by advising that the hygiene room is to DfE standard for primary school usage and two large hygiene rooms are providing teaching/learning hubs and on this basis, the Access Officer raises no further concerns.

The GLA also consider that the applicant has given careful consideration to BB104 which provides guidelines for the design of SEND schools and that with level access throughout, wide corridors and all rooms used by pupils being fully accessible to wheelchair users, the design can accommodate pupils with a wide range of disabilities and controls the level of stimulus, as well as through facilities that support those with severe disabilities, including nursing stations, laundry, a hydrotherapy pool, therapy rooms and quiet rooms.

The GLA also advise that each classroom would also contain an "escape room" where children can retreat to if needed. These rooms all look out onto green open space, which is welcomed. As the school would all be located on one level, there are no barriers to pupils moving around such as lifts and stairs and there would be no design obstacles to safe and dignified emergency evacuation. As such, GLA officers consider that the development would provide a high standard of inclusive design and accessibility, which is supported.

7.13 Provision of affordable & special needs housing

Not relevant to the consideration of this application.

7.14 Trees, landscaping and Ecology

Trees and Landscaping

Policy 5.10 of the London Plan and the Mayor's intend to publish London Plan Policy G5 state that developments should provide new green infrastructure that contributes to urban greening. Policy G5 also sets out a new Urban Greening Factor (UGF) to identify the

appropriate amount of urban greening required in new developments. Policy 7.21 of the London Plan advises that trees and woodlands should be protected, maintained, and enhanced and existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree' and wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species. The Mayor's intend to publish London Plan Policy G5 state that developments should provide new green infrastructure that contributes to urban greening. Policy G5 also sets out a new Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments.

Policy DMHB 14 of the Hillingdon Local Plan requires development to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit; provide a landscape scheme that includes hard and soft landscaping appropriate to the area that enhances biodiversity and amenity; living walls and roofs are considered where ground floor space is limited and accurate tree surveys are provided where proposals affect trees.

The Council's Trees and Landscape Officer has reviewed the proposal and advises that a tree survey by Ecology Link has identified four individual trees or groups which are on, or close to, the site. T1 a 'B' grade sycamore and G1 ('C' grade apples) will be removed to facilitate the development. G2 (a mix of 'C' grade trees and G3 ('A' grade white willow) are off-site / close to the western edge. Only the off site group of White willow ('A' grade) will be retained. All other trees will be removed to facilitate the development.

Since the White willows (G3) are beyond the site boundary, they will effectively be protected by the site hoardings and should not be affected by the construction-related activity. There is no objection to the proposals subject to a pre-commencement landscaping condition. This forms part of the officer recommendation.

The officer goes on to advise that the scheme is supported by a landscape report / D&AS, by Colour (landscape consultants), dated March 2020. The report explains the boundary treatments and zonal planning which specifically addresses the personal safety, operational management and educational needs of a SEND school. The car park fronting onto Broadmead Road and much of the Arcon Way frontage will be soft landscaped to provide a warm welcoming boundary and mitigate the effects of the required 2.4 metre high security fencing. Other soft landscaped zones include: a food and horticultural garden, internal planted courtyards, an art and music garden, passive external spaces, and a habitat / activity trail area. The arrangement of the external spaces within the site has been organised to ensure that the green open spaces have been located along the Green Belt boundary. The built development incorporates a large shallow-pitched, south-facing green roof on a single-storey building which faces the Green Belt. This is an attractive and sensitive landscape layout which reflects the design brief discussed at pre-application stage.

The GLA advise that the Urban Greening Factor (UGF) should be calculated by the applicant as set out in Policy G5 to achieve the specified target of 0.3. A drawing showing the surface cover types and accompanying UGF calculation should be submitted prior to Stage 2. If the UGF target of 0.3 is not achieved then the applicant should review the urban greening proposed and seek to improve the quantity or quality of urban greening, such as providing additional green roofs. Should the scheme have no capacity to incorporate any further greening, clear justification should be provided setting out the limitations.

The applicant has submitted an Urban Greening Factor table and a Landscape

Masterplan. They advise that they demonstrate that the 6,430 sqm of landscaping enables the scheme to score 0.35, which is in excess of the target of 0.3. No changes are therefore required to the landscape scheme in order to meet this policy objective. It will be for the GLA in their Stage 2 Report to advise if this policy objective has been satisfied.

Ecology

The NPPF at Paragraph 170 advises that planning policies and decisions should contribute to and enhance the natural and local environment by, amongst other criteria:

'd) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures'.

London Plan Policy 7.19 and the Mayor's intend to publish London Plan Policy G6 state that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively.

Policy DME1 7 requires the design and layout of new development to retain and enhance any existing features of biodiversity or geological value and where this is unavoidable, replacement features of equivalent biodiversity value should be provided on site and where these can not be provided due to site constraints, appropriate contributions will be sought, secured through a legal agreement, for off-site works. Development on or near sites of ecological or geological value require surveys and assessments to demonstrate that they will not have an unacceptable impact and additional improvements will be sought for development that fronts a river or the Grand Union Canal. Development that results in significant harm to biodiversity, which can not be avoided, mitigated or as a last resort, compensated for will normally be refused.

Importantly, ODPM Circular 06/05 states that:-

It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision'.

An extended Phase 1 Habitat Survey has been undertaken by Ecology Link. The report concludes that further specific surveys may be required but makes no specific site recommendations due to the lack of any available designs / plan proposals.

Natural England have not provided any specific comments on the application, advising that regard should be had to their standing advice and that it is for the LPA to determine the application in accordance with national and local policies, together with the input from other bodies and individuals.

The Hertfordshire and Middlesex Trust have been consulted and object to the proposal on the basis that an ecological survey(s), particularly a reptile survey has not been completed, a Defra biodiversity metric assessment has not been supplied and biodiversity net gain has not been demonstrated.

The GLA also advise that the applicant should provide evidence the proposed development secures a net biodiversity gain in accordance with Policy G6 and if biodiversity net gain can not be achieved on site, the applicant should review opportunities for biodiversity offsetting in consultation with the borough.

As advised above, the applicant has submitted information which demonstrates that the scheme will achieve an Urban Greening Factor of 0.35, which is in excess of the target of 0.3. The ecological surveys are also in the process of being prepared but they are not available at the time of the preparation of this report.

The Council's Sustainability Officer advises that any approval will need to condition the reptile survey, which will need to be a pre-commencement condition with appropriate method statements and mitigation to be agreed with the Council and an appropriate scheme of ecological enhancement. On the specific issue of the survey(s), although the LPA would normally require these to be provided before the application was presented to committee, they would still need to be submitted and assessed before any decision is made and there is a pressing requirement for the new SEND provision which may involve funding issues, it is considered that an exception can be made in this instance. As a further safeguarding measure, in accordance with GLA advice, a clause has been added to the Heads of Terms to ensure that provision for biodiversity offsetting is available, should this prove to be necessary.

7.15 Sustainable waste management

London Plan Policy 5.17 requires adequate provision to be made for refuse and recycling facilities for new development.

A bin store would be provided along the north eastern boundary of the site on Ballinger Way. Local Council refuse collection / commercial waste will be used, expected to be combined with other commercial refuse collection within Grand Union Village.

7.16 Renewable energy / Sustainability

Policy 5.2 of the London Plan (March 2016) and Policy SI2 of the Mayor's intend to publish London Plan establishes the energy hierarchy for minimizing carbon dioxide emissions, Policy 5.3 states that the highest standards of sustainable design and construction should be employed, Policy 5.6 requires an assessment of the use of Combined Heat and Power systems, Policy 5.7 seeks to increase the use of renewable energy and Policy 5.9 seeks to address impacts of overheating and excessive heat generation.

An Energy Statement has been submitted in support of the application which sets out how the development proposes to reduce carbon dioxide emissions in accordance with the energy hierarchy.

The Council's Sustainability Officer has assessed the proposals and advises that the scheme is acceptable, subject to an energy condition requiring 35% saving of carbon emissions and full details of the proposed PV and heat pumps proposed.

7.17 Flooding or Drainage Issues

The NPPF (February 2019) at paragraph 163 advises that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Policy 5.12 of the London Plan (March 2016) seeks to manage flood risk associated with development and Policy DMEI 10 of the Local Plan, Part 2 requires development proposals to make adequate provision for surface water run-off and water use efficiency.

The site is in Flood Zone 1 and less than 1 hectare in area and as such, a Flood Risk Assessment (FRA) is not required for this proposal. However, a Sustainable Drainage Report has been submitted in support of the application.

The Council's Flood and Water Management Officer has reviewed the application and advises that the proposal in order to manage drainage on the site include a proposal to

discharge at 4.25ls which is not the required greenfield run off rate of 1.4ls for the 0.85 ha site. The site will need to reduce the run off to 1.4l/s to ensure it is policy compliant. The proposals appear to suggest that this storage to control the flows of water within the site will be through a variety of methods including Green roof, filter strip, permeable paving as well as storage tank(s). However there are further opportunities that this design is missing to ensure the most sustainable scheme. Discounting "rain gardens" and above ground conveyance due to limited space is an inadequate explanation. Any School should incorporate Suds in a way that benefits the education and follows recent GLA guidance on Suds in Schools <https://www.london.gov.uk/what-we-do/environment/climate-change/surface-water/suds-sector-guidance>. The officer advises that further discussions with the applicant are needed to maximise opportunities for rain gardens along the access roads, protecting pupils from air pollution and wider footpath to facilitate walking and cycling and trees integrated within the car parking areas to shade and reduce the urban heat island impact.

The GLA also advise in their Stage 1 Report that the surface water drainage for the proposed development does not comply with London Plan Policy 5.13 and the Mayor's intend to publish London Plan Policy SI13, as it does not give appropriate regard to the drainage hierarchy and greenfield runoff rate.

Further details on how SuDS measures at the top of the drainage hierarchy will be included in the development, and how greenfield runoff rate will be achieved should be provided. Evidence of the calculation of greenfield runoff rate should be provided.

The proposed development also does not meet the requirements of London Plan Policy 5.15 and the Mayor's intend to publish London Plan Policy SI5, as no water efficiency information has been provided. As such, further information on the water consumption targets should be provided.

Further discussions Between the Council's FWMO and the applicant are on-going and it is hoped that an up-date can be provided on the Addendum. The GLA will be able to comment on any amendments made as part of their Stage Two Report.

In the meantime, a condition has been added which requires details of appropriate SuDS drainage and water efficiency measures to be submitted.

7.18 Noise or Air Quality Issues

Noise

Policy 7.15 of the London Plan (March 2016) requires development proposals to manage noise, amongst other criteria by avoiding significant adverse noise impacts on health and quality of life and by separating noise sensitive development from major noise sources through use of distance, screening or internal layout in preference to sole reliance on sound insulation.

The siting of the school building is set back from Broadmead Road and its layout does ensure that pupils can be separated from the noise generated by passing traffic and pedestrians, staff rooms and car parking areas and the building includes high, medium and low stimulus areas, which includes stimulus sources such as noise.

A Noise Assessment Report has been submitted in support of the application. Having regard to the Environmental Noise Survey undertaken on 22/11/19, this advises of the glazing and facade criteria that would have to be satisfied to ensure the school building would not be unduly exposed to road traffic noise and satisfies appropriate noise standards. The report also demonstrates that the nearest surrounding residential properties would not be unduly affected by plant and machinery operated at the school.

The GLA in their Stage 1 Report advises that as regards noise, the layout raises no strategic concerns and is supported.

As regards noise generation from the use of the school, the potential for disturbance would only arise as a result of the traffic generated and the use of the external play areas. However, given the anticipated traffic levels generated by the school, its limited pupil intake of upto 80 pupils and its siting, being separated from adjoining residents by surrounding roads and a public footpath in the case of Darris Close, it is considered that the potential for noise disturbance is limited and the siting of the school would be no more proximal to surrounding residential properties than the majority of schools.

Air Quality

Policy 7.14 of the London Plan (March 2016) advises that development proposals should minimise exposure to poor air quality and address local air quality problems, particularly within AQMAs and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality such as children and the elderly through design solutions, greater use of sustainable transport, promotion of sustainable design and construction, be at least 'air quality neutral' and not lead to the deterioration of existing poor air quality. Provision to reduce emissions should be made on site and only where this can be demonstrated to be impractical, will off-site provision / contributions be acceptable. Where biomass boilers are included, permission should only be granted if no adverse impacts from the boilers are identified.

Policy DMEI 14 of the Hillingdon local Plan: Part Two - Development Management Policies (January 2020) requires development proposals to demonstrate appropriate reductions in emissions to contribute towards meeting EU and national air quality objectives for pollutants and as a minimum, be air quality neutral, include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new and actively contribute towards the improvement of air quality, especially within the AQMA.

The GLA advise that the application is for development within an Air Quality Management Area. As such, in accordance with London Plan Policies and the Mayor's intend to publish London Plan Policy SI1, an air quality assessment has been provided. Policy SI1 states that this should take an air quality neutral approach.

GLA officers consider that there would be no air quality impacts on existing receptors and that air quality for future occupants will be acceptable. Moreover, the development meets both the building and transport emissions benchmarks and is therefore considered air quality neutral. As such, the development is in accordance with London Plan Policy 7.14 and the Mayor's intend to publish London Plan Policy SI1.

The Council's Air Quality Officer advises that this is not within a more sensitive Air Quality Focus Area and has a trip generation of 66 two-way vehicle trips during both the school opening and closing time periods. The proposed development will include provision for 48 car parking spaces and it is anticipated that there would be a maximum of 10 vehicle movements a day, resulting from staff working in the proposed building. As such, potential air quality impacts associated with operational phase road vehicle exhaust emissions are predicted to have an insignificant effect.

However, conditions are recommended to secure compliance with the Non-Road Mobile Machinery Low Emissions Zone for London and on measures to control emissions during construction as per Appendix D of the applicant's air quality assessment. These conditions form part of the officer's recommendation.

7.19 Comments on Public Consultations

The comments received in support of the proposals are noted. As regards the objections comments received, those raising material planning considerations are dealt with in the officer's report.

7.20 Planning obligations

Policy DMCI 7 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) is concerned with securing planning benefits related to the scale and type of development. The policy is supported by more specific supplementary planning guidance.

The following additional Heads of Terms would be required to mitigate the impact of the development:

- i) Highways: S278/S38 agreement to secure highway works to include a new formal pedestrian crossing that aligns with the proposed pedestrian entrance on Broadmead Road,
- ii) Travel Plan (that requires the school to work with Hillingdon Council's School Travel and Road Safety team on an ongoing basis to work towards the TFL Travel Plan accreditation) and £20,000 bond,
- iii) Biodiversity offsetting, if required
- iv) Construction Training: either a contribution equal to the formula (£2,500 for every £1m build + coordinator costs) or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development with the preference being for an in-kind scheme to be delivered.
- v) Project Management & Monitoring Fee: a contribution equal to 5% of the total cash contributions secured from the scheme to enable the management and monitoring of the resulting agreement.

The applicant has agreed to the above heads of terms. As such, the scheme complies with Policy DMCI 7 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

7.21 Expediency of enforcement action

There are no enforcement issues raised by this application.

7.22 Other Issues

Contamination:

Policy DMEI 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) expects development proposals on potentially contaminated sites to be accompanied by at least an initial study of the likely contaminants and advises that schemes will be supported where contamination has been adequately assessed and can be safely remediated. It goes on to advise that conditions may be imposed to ensure remedial works are implemented; where contamination levels are harmful to human health or controlled waters, full intrusive investigations and remediation proposals will be expected prior to any permission being granted and remediation works may require the need for a S106 if for instance, on-going management works are required.

The application is supported by two contamination reports, a Ground Investigation Report, dated 26 July 2018 and a Supplementary Phase II Geo-environmental Assessment Report, dated 15 January 2019.

The Council's Contamination Officer has reviewed these documents and advises that the initial Ground Investigation Report includes a land use history using historical mapping of the site and its surroundings and it provides a suitable platform to develop and inform the subsequent site investigations.

As regards the Supplementary Phase II Geo-environmental Assessment Report, the officer advises that this includes an updated conceptual site model (CSM) which identifies on-site and nearby off-site sources of contaminants, which include isolated occurrences of lead and asbestos, which the reports indicate are likely to have originated from shallow infilling of the historic brickfields, in conjunction with the presence of identified made ground materials from more recent use made of the site. However, the risk assessment within the updated CSM is given as Very Low to Low in terms of contaminants identified during laboratory analyses of samples taken from the site during investigation works.

The officer goes on to advise that a section of the HSP report (prior to the updated CSM) indicates an elevated percentage volume/volume (6.8%) and flow rate (3.2 l/hr) of carbon dioxide (CO₂) detected during a sequence of scheduled gas monitoring visits. The results of a subsequent calculation identified a Characteristic Situation 2 (CS2) category, which represents a low risk classification. However, the presence of CS2 indicates remedial action is necessary, with a requirement for two levels of protection to be incorporated during construction of floors within ground floor areas of the proposed new building/s.

In accordance with stated findings and recommendations within the above report/s, details are now required in order to clearly identify suitably designed, site-specific, ground gas protection measures which are to be implemented.

The officer recommends that if recommended for approval, two conditions are required to ensure that ground gas is mitigated and to prevent contaminated soil /material being imported onto the site. These form part of the officer recommendation and the scheme is therefore considered to comply with Policy DMEI 12 of the Local Plan.

Fire Safety:

Policy D12 of the Intend to Publish of the London Plan (2019) states that 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. In this regard a Fire Strategy Summary Technical Note has been submitted as part of the application.

The GLA advise that the applicant should provide further details on construction methods and materials used, particularly the wooden cladding on the southern 'W' shaped block and the Council should reeview the fire statement in consultation with building control officers.

It is considered that a condition should be added to any permission to secure the implementation of a final Fire Strategy for all aspects of the development in accordance with draft Policy D12 of the London Plan - Intend to Publish (2019). This forms part of the officer's recommendation.

Lighting

A lighting plan has been produced which shows that there would be minimal spillage of light outside of the application site.

Other Issues:

No other planning issues are raised by this application.

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 proposal seeks full planning permission for the erection of a new Special Education

Needs and Disability (SEND) school, with places for 80 pupils, together with associated landscaping, play areas, boundary treatments and car parking to occupy an irregularly shaped plot located on the south eastern side of Broadmead Road, at its junction with Ballinger Way within the Green Belt, close to the boundary with LB of Ealing.

The school site itself will occupy an area of approximately 0.47 hectares. The proposal would encompass the provision of hard and soft playspace for the children, extensive landscaping works and the provision of associated car parking. A drop off/pick up area would also be provided.

The GLA and the Council's Education Services have confirmed that there is a need for new SEND provision, particularly in the south of the borough as the only other specialist school is in the north of the borough.

The proposal would represent inappropriate development within the Green Belt and result in the loss of a portion of open space. However, the increased demand for SEND provision is compelling and well evidenced and it has been demonstrated that there are no alternative sites which could reasonably be utilised to meet this need.

This educational need represents very special circumstances and on balance this need outweighs the harm which would arise from the development in other respects, including through loss of open space by reason of inappropriateness.

The proposed development would be subject to extensive landscaping, including new tree planting, has been designed in order to minimise the use of land and minimise its impact on the openness of the green belt, including incorporation of a green roof on the side of the building facing the remaining Green Belt land. It is considered that having established the need for the facility, the design of the development, so far as is possible, minimises the impacts of the development and would sit comfortably within its surrounding context.

In relation to ecology, although an Extended Phase 1 Habitat Survey Report has been submitted, a more detailed survey is required to establish the presence or otherwise of protected species on site, most notably reptiles which is being undertaken. However, due to the pressing need for the new school and possible funding implications of delay in issuing the Council's decision, although not ideal, it is recommended that a condition is imposed to ensure that the survey(s) is provided prior to the commencement of works on site, together with a requirement within the S106 for biodiversity offsetting if this is required.

The proposal is supported by a detailed Transport Assessment and following further assessment carried out by the applicant, the Council's Highways Engineers conclude that the proposed development would be acceptable in terms of traffic impact, pedestrian and highway safety.

The school is well separated from surrounding residential properties and subject to appropriate conditions it would have no unacceptable impacts on the amenity of neighbouring residential occupiers by way of dominance, loss of light, loss of privacy or noise.

The development has also been designed to fully accord with all requirements relating to accessible design, sustainable design and flood risk.

In conclusion, very special circumstances exist that outweigh the harm which would arise from the development in other respects, including through loss of open space by reason of inappropriateness. Having regard to this educational need, the development has been

well designed to minimise its impacts and would comply with all other relevant planning policies.

The application is recommended for approval, subject to the appropriate referrals to the Greater London Authority and the Secretary of State.

11. Reference Documents

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

Hillingdon Local Plan: Part 2 - Development Management policies (January 2020)

London Plan (March 2016)

National Planning Policy Framework (2019)

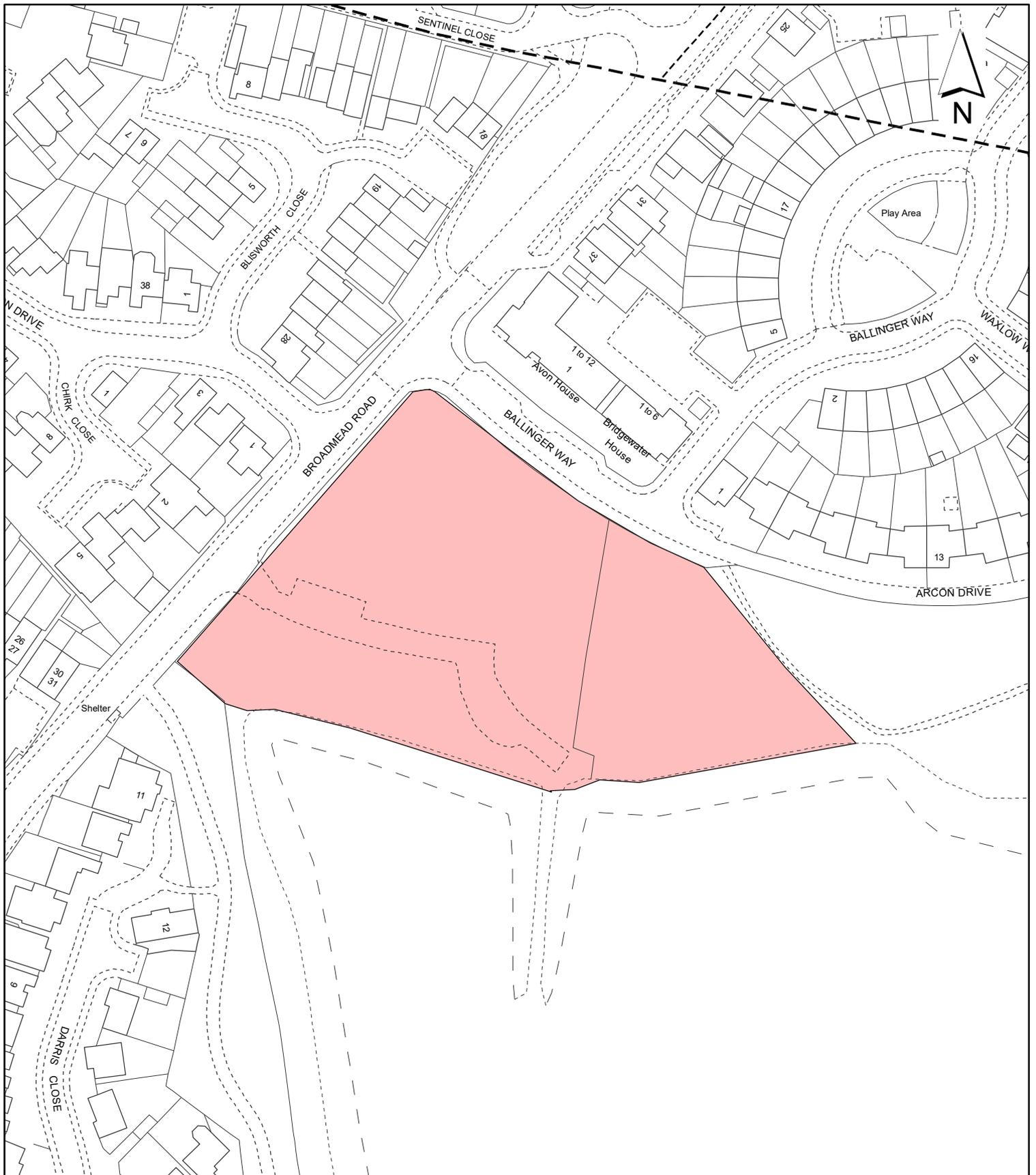
Council's Supplementary Planning Document - Accessible Hillingdon

Council's Supplementary Planning Document - Planning Obligations

London Borough of Hillingdon Open Space Strategy, 2011 - 2026

Contact Officer: Richard Phillips

Telephone No: 01895 250230



Notes:

 Site boundary

For identification purposes only.
 This copy has been made by or with the authority of the Head of Committee Services pursuant to section 47 of the Copyright, Designs and Patents Act 1988 (the Act).
 Unless the Act provides a relevant exception to copyright.
 © Crown copyright and database rights 2020 Ordnance Survey 100019283

Site Address:

Land east of Broadmead Road & South of Arcon Way, Broadmead Road, Northolt

LONDON BOROUGH OF HILLINGDON
 Residents Services
 Planning Section

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

Planning Application Ref:

71486/APP/2020/1369

Scale:

1:1,250

Planning Committee:

Major

Date:

August 2020



HILLINGDON
 LONDON