

## Report of the Head of Development Management and Building Control

**Address:** LORD ADONIS HOUSE HAREFIELD ACADEMY NORTHWOOD WAY  
HAREFIELD

**Development:** Demolition of former residential school and erection of academic building (Use Class F1) and ancillary structures including heat pump and substation enclosures, construction of a multi-use games area, revised vehicular access, landscaping, car and cycle parking and associated works.

**LBH Ref Nos:** 17709/APP/2023/2673

**Drawing Nos:** TVC0024-NOV-V3-XX-DR-A-PL11 Rev. P01  
TVC0024-NOV-V1-00-DR-A-PL12 Rev. P01  
TVC0024-NOV-V1-01-DR-A-PL13 Rev. P01  
TVC0024-NOV-V1-XX-DR-A-PL15 Rev. P01  
TVC0024-NOV-V1-XX-DR-A-PL16 Rev. P01  
TVC0024-NOV-V1-02-DR-A-PL14 Rev. P01  
TVC0024-NOV-V1-XX-DR-A-PL17 Rev. P01  
TVC0024-NOV-V2-00-DR-A-PL03 Rev. P01  
TVC0024-WWA-V2-ZZ-GD-L-0107 Rev. P02  
TVC0024-NOV-V1-XX-DR-A-PL20 Rev. P01  
TVC0024-NOV-V1-XX-T-A-PL19 Design & Access Statement (Dated September 2023)  
TVC0024-WWA-V2-ZZ-GD-L-0105 Rev. P02  
Outline Construction and Demolition Method Statement  
27471-HYD-XX-XX-RP-GE-0001 Issue S2 Ground Investigation Report (Dated 4th May 2023)  
RT/2323/0014/P/0002 Utility Mapping Survey  
TVC0024-ESS-V2-XX-DR-ME-7000 Rev. P01  
TVC0024-WWA-V2-ZZ-DR-L-0104 Rev. P01  
TVC0024-WWA-V2-ZZ-DR-L-0103 Rev. P02  
TVC0024-WWA-V2-ZZ-DR-L-0501 Rev. P01  
TVC0024-WWA-V2-ZZ-DR-L-0101 Rev. P02  
Planning Statement (Dated September 2023)  
TVC0024-ESS-XX-XX-RP-ME-0005 Plant and Ventilation Extraction Statement (Dated 24th August 2023)  
TVC0024-WWA-V2-00-DR-L-0304 Rev. P02  
TVC0024-WWA-V2-00-DR-L-0301 Rev. P02  
TVC0024-WWA-V2-00-DR-L-0303 Rev. P02  
TVC0024-WWA-V2-00-DR-L-0302 Rev. P02

TVC0024-WWA-V2-ZZ-DR-L-0502 Rev. P01  
TCC0024-RWC-XX-XX-DR-C-0101 P01  
TCC0024-RWC-XX-XX-DR-C-0102 P01  
TCC0024-RWC-XX-XX-DR-C-0103 P01  
TCC0024-RWC-XX-XX-DR-C-0104 P01  
TCC0024-RWC-XX-XX-DR-C-0105 P01  
TVC0024-ESS-V2-XX-DR-E-6700 Rev. P01  
TVC0024-ESS-V2-XX-DR-E-6710 Rev. P01  
TVC0024-ESS-XX-XX-RP-ME-002 Rev. P01 Net Zero in Operation Report  
(Dated 24th August 2023)  
TVC0024-ESS-XX-XX-RP-ME-0003 Rev. P01 Daylighting Report (Dated 24th  
August 2023)  
TVC0024-RWC-XX-XX-RP-H-0002 S0 P01 School Travel plan (Dated  
September 2023)  
TVC0024-WWA-V2-ZZ-GD-L-0106 Rev. P02  
27471-HYD-XX-ZZ-RP-Y-5002\_P01 Whole Life Carbon Assessment (Dated 8th  
September 2023)  
TVC0024-WWA-V2-ZZ-GD-L-0109 Rev. P02  
TVC0024-WWA-V2-ZZ-DR-L-0102 Rev. P02  
002 Rev. 01 Arboricultural Method Statement (Dated September 2023)  
27471-HYD-XX-XX-RP-FE-0001 Rev. 01 Fire Statement (Dated 20th September  
2023)  
Landscape and Visual Impact Assessment V. PL04 (Dated October 2023)  
27834-HYD-ZZ-XX-YY-RP-2001-P01 Air Quality Assessment (Dated 8th  
September 2023)  
001 Rev. 001 Arboricultural Survey (Dated September 2023)  
21068-MHA-WS-XX-R-C-003 Rev. P4 Flood Risk & Drainage Strategy (Dated  
11th September 2023)  
GLA Response 1  
TVC0024-RWC-XX-XX-RP-H-0004 S0 P01 Transport Response to Stage 1 GLA  
report  
Response to GLA Stage 1 Report (Dated 16th November 2023)  
27471-HYD-00-XX-RP-C-7000 Issue 02 Drainage Strategy (Dated 30th October  
2023)  
27471-HYD-XX-ZZ-RP-Y-5001 Issue P03 Circular Economy Statement (Dated  
27th October 2023)  
TVC0024-ESS-XX-XX-RP-ME-0001 Rev. P01 Energy Strategy Part L Report  
(Dated 28th August 2023)  
TVC0024-RWC-XX-XX-RP-H-0003 S0 P01 Delivery and Servicing Plan (Dated  
September 2023)  
TVC0024-WWA-V2-ZZ-DR-L-0108 Rev. P02 Tree Retention & Removal Plan  
TVC0024-RWC-XX-XX-RP-H-0001 S0 P01 Transport Assessment (Dated

September 2023)

TVC0024-NOV-V2-00-DR-A-PL02 Rev. P01

TVC0024-NOV-V3-00-DR-A-PL04 Rev. P01

TVC0024-NOV-V3-01-DR-A-PL05 Rev. P01

TVC0024-NOV-V3-02-DR-A-PL06 Rev. P01

OPP-105283 AC - 1v1 Planning Noise Assessment (Dated 7th August 2023)

TVC0024-NOV-V3-03-DR-A-PL07 Rev. P01

TVC0024-NOV-V3-XX-DR-A-PL09 Rev. P01

TVC0024-NOV-V1-XX-DR-A-PL18 Rev. P01

TVC0024-NOV-V2-00-DR-A-PL01 Rev. P01

TVC0024-NOV-V3-XX-DR-A-PL10 Rev. P01

TVC0024-NOV-V3-XX-DR-A-PL08 Rev. P01

<b>Date Plans received:</b>	11-09-2023	<b>Date(s) of Amendments(s):</b>	11-09-2023
			25-09-2023
<b>Date Application valid</b>	11-09-2023		23-10-2023
			16-11-2023

## 1. SUMMARY

The application proposal is inherently linked to Meadow High School, which is at capacity with 257 pupils, and the need to provide additional school SEND places. Currently, there are only three schools in Hillingdon that support children with SEND and each school is full, with demand increasing. The need is urgent as the pupils are already in primary schools and this needs to be reflected in an increase of secondary school provision.

In planning policy terms, the proposed school is supported in principle and Sport England have not objected to the proposals. Following an assessment of the development, the proposal is also considered to be appropriate development within the Green Belt, without detriment to the street scene and sensitive to neighbour amenity. The development is also considered acceptable with regard to its impact on the local highway network and air quality. Planning obligations are also proposed to be secured by a Section 106 legal agreement, including obligations to secure net-zero carbon development, a travel plan and a Section 278 agreement for the new vehicular access proposed on Northwood Road.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The proposal is considered to be acceptable and is recommended for approval, subject to a Section 106 legal agreement and planning conditions.

## 2. RECOMMENDATION

**That delegated powers be given to the Director of Planning, Regeneration and Environment to grant planning permission subject to the following:**

A) That the application be referred to the Mayor under Article 5 of the Town and Country Planning (Mayor of London) Order 2008.

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

i) Carbon Offset Contribution: Any additional shortfall identified through the ongoing reporting required by Condition 22 shall form a cash in lieu contribution in accordance with Policy SI2 of the London Plan at a rate of £95/tCO<sub>2</sub> annualised for not more than 30 years beginning on the commencement of development.

ii) Travel Plan: A full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include such matters as: targets for sustainable travel arrangements; effective measures for the ongoing monitoring of the Travel Plan; and a commitment to delivering the Travel Plan objectives.

iii) Highways Works: Section 278 agreement to secure highway works, including construction of new access on Northwood Road.

iv) Employment Strategy and Construction Training: either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is the Council's priority. A financial contribution will only be accepted in exceptional circumstances.

v) Project Management & Monitoring Fee: A financial contribution equal to 5% of the total cash contributions.

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 and agree any changes requested by the GLA.

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

'The applicant has failed to mitigate the impacts posed by the proposed development (in respect of Carbon Offsetting, Travel Planning and Project Management and Monitoring). The scheme therefore conflicts with Policies DMCI 7 of the Hillingdon Local Plan: Part 2 (2020); the adopted Planning Obligations Supplementary Planning Document (2014); Policy DF1 of the London Plan (2021); and paragraphs 55-57 of the National Planning Policy Framework (2023).'

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:

#### Location Plan:

TVC0024-NOV-V2-00-DR-A-PL01 Rev. P01;

#### Proposed Site Plan:

TVC0024-WWA-V2-ZZ-DR-L-0101 Rev. P02;

#### Proposed Floor Plans:

TVC0024-NOV-V1-00-DR-A-PL12 Rev. P01;

TVC0024-NOV-V1-01-DR-A-PL13 Rev. P01;

#### Proposed Elevations:

TVC0024-NOV-V1-XX-DR-A-PL15 Rev. P01;

TVC0024-NOV-V1-XX-DR-A-PL16 Rev. P01;

#### Proposed Roof Plan:

TVC0024-NOV-V1-02-DR-A-PL14 Rev. P01;

#### Proposed Sections:

TVC0024-NOV-V1-XX-DR-A-PL17 Rev. P01;

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 (2021).

### 3. COM5 General Compliance with Supporting Documentation

The development hereby permitted shall not be carried out except in complete accordance with the specified supporting plans and/or documents:

27471-HYD-XX-XX-RP-GE-0001 Issue S2 Ground Investigation Report (Dated 4th May 2023);

27471-HYD-XX-XX-RP-FE-0001 Rev. 01 Fire Statement (Dated 20th September 2023);

27834-HYD-ZZ-XX-YY-RP-2001-P01 Air Quality Assessment (Dated 8th September 2023);

21068-MHA-WS-XX-R-C-003 Rev. P4 Flood Risk & Drainage Strategy (Dated 11th September 2023);

27471-HYD-00-XX-RP-C-7000 Issue 02 Drainage Strategy (Dated 30th October 2023);

TVC0024-ESS-XX-XX-RP-ME-0001 Rev. P01 Energy Strategy Part L Report (Dated 28th August 2023);  
TVC0024-ESS-XX-XX-RP-ME-002 Rev. P01 Net Zero in Operation Report (Dated 24th August 2023);  
TVC0024-ESS-XX-XX-RP-ME-0003 Rev. P01 Daylighting Report (Dated 24th August 2023);  
TVC0024-RWC-XX-XX-RP-H-0002 S0 P01 School Travel plan (Dated September 2023);  
TVC0024-NOV-V1-XX-T-A-PL19 Design & Access Statement (Dated September 2023);  
TVC0024-WWA-V2-ZZ-GD-L-0106 Rev. P02 Urban Greening Factor;  
TVC0024-NOV-V1-XX-DR-A-PL20 Rev. P01WC Provision & Strategy Layout;  
TVC0024-ESS-XX-XX-RP-ME-0005 Plant and Ventilation Extraction Statement (Dated 24th August 2023);  
002 Rev. 01 Arboricultural Method Statement (Dated September 2023);  
Landscape and Visual Impact Assessment V. PL04 (Dated October 2023);  
27471-HYD-XX-ZZ-RP-Y-5001 Issue P03 Circular Economy Statement (Dated 27th October 2023);  
27471-HYD-XX-ZZ-RP-Y-5002\_P01 Whole Life Carbon Assessment (Dated 8th September 2023);  
and  
TVC0024-RWC-XX-XX-RP-H-0001 S0 P01 Transport Assessment (Dated September 2023).  
OPP-105283 - AC - 1v1 Planning Noise Assessment (Dated 7th August 2023).

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

#### REASON

To ensure the development complies with the provisions of Hillingdon Local: Plan Parts 1 (2012) and 2 (2020) and the London Plan (2021).

#### **4. NONSC Noise Limits**

For the lifetime of the development hereby permitted the rating level of noise caused by plant, machinery or equipment, operating as required, shall be at least 5 dB below the minimum background noise level, or 40 dB(A), whichever is lower, measured 1 metre outside of any window of any dwelling, or similarly noise sensitive premises, determined in accordance with the procedures set out in British Standard BS4142:2014.

#### REASON

To safeguard the amenity of the occupants of the surrounding properties in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) and Policy D14 of the London Plan (2021).

#### **5. NONSC Connection to Future District Heating Network**

The development hereby approved shall connect to a district heating network should one become available in future.

#### REASON

To ensure compliance with Policy SI 3 of the London Plan (2021).

#### **6. NONSC Digital Connectivity Infrastructure**

The development hereby approved shall ensure that sufficient ducting space for full fibre connectivity infrastructure is provided.

## REASON

To ensure compliance with Policy SI 6 of the London Plan (2021).

### **7. 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 course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. 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 at <https://nrmm.london/>."

## REASON

To comply with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy, in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DME1 14 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 1 of the London Plan (2021) and Paragraphs 174(e), 186 and 188 of the National Planning Policy Framework (2021).

### **8. NONSC Construction Management and Logistics Plan**

Prior to the commencement of works on site for the development, a Construction Management and Logistics Plan for the development shall be submitted to and approved in writing by the Local Planning Authority. This plan shall detail:

- (i) The phasing of the works;
- (ii) The hours of work;
- (iii) On-site plant and equipment;
- (iv) Measures to mitigate noise and vibration;
- (v) Measures to mitigate impact on air quality;
- (vi) Waste management;
- (vii) Site transportation and traffic management, including:
  - Routing;
  - Signage;
  - Vehicle types and sizes;
  - Hours of arrivals and departures of staff and deliveries (avoiding peaks times of day);
  - Frequency of visits;
  - Parking of site operative vehicles;
  - On-site loading/unloading arrangements; and
  - Use of an onsite banksman (if applicable).
- (viii) The arrangement for monitoring and responding to complaints relating to demolition and construction;
- (ix) Crane Management Plan; and
- (x) Measures to avoid and mitigate impacts to the Shepherds Hill House Site of Importance for Nature Conservation.

This plan should accord with Transport for London's Construction Logistic Planning Guidance and the GLA's 'The Control of Dust and Emissions during Construction and Demolition' Supplementary Planning Guidance (July 2014) (or any successor document). It shall cover the entirety of the

application site and any adjoining land which will be used during the construction period. It shall include the details of cranes and any other tall construction equipment (including the details of obstacle lighting).

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

#### REASON

To safeguard the amenity of surrounding areas and 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 local air quality, in accordance with Policies DMT 1, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) and Policies D14, SI 1, T4 and T7 of the London Plan (March 2021).

### **9. NONSC Front Elevation Details**

Notwithstanding the plans hereby approved and prior to commencement of development, final details for the primary entrance on the front (east facing) elevation, shall be 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.

#### REASON

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

### **10. NONSC Ancillary Building Details**

Notwithstanding the plans hereby approved and prior to commencement of development, final details for the ancillary utility structures shall be submitted to and approved in writing by the Local Planning Authority. This detail shall include a consolidation of the structures if possible, in order to reduce the clutter on this site.

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

#### REASON

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

### **11. COM7 Materials**

Prior to the commencement of development above ground, details of all materials and external surfaces (including the main building and ancillary buildings) shall be submitted to and approved in writing by the Local Planning Authority. Details should include information relating to make, product/type, colour and photographs/images.

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

#### REASON



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

#### **12. NONSC Details of Roof Parapet, Doors and Windows**

Prior to the commencement of development above ground, the detailed design of the roof parapet, doors and windows shall be 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.

#### **REASON**

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

#### **13. NONSC Dead-End Corridors and Inner Room Details**

Notwithstanding the plans hereby approved and prior to commencement of development above ground, a revised internal layout and/or a detailed scheme to mitigate against the fire safety risks of dead-end corridors and inner rooms shall be 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.

#### **REASON**

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

#### **14. NONSC Sustainable Water Management**

Prior to the commencement of the development (not including demolition and site clearance), a detailed surface water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall detail the specific measures to ensure the run-off from the proposed developments meets the targets set out in the approved drainage strategy (27471-HYD-00-XX-RP-C-7000 Issue 02 Drainage Strategy (Dated 30th October 2023)). The details must demonstrate compliance with the London Plan sustainable drainage hierarchy and detail the use of measures within the fabric of the building (i.e. living roofs) and in the landscaping (i.e. rain gardens) to meet the target run off rates. Recourse to drainage tanks should only be considered where more suitable alternatives (i.e. higher up the drainage hierarchy) are demonstrably unfeasible. The details must also demonstrate how water will be collected, stored and reused within the development. The development must proceed and be occupied in accordance with the approved scheme.

#### **REASON**

To ensure that surface water run off is controlled and to ensure the development does not increase flood risk, in compliance with Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 12 and SI 13 of the London Plan (2021), the National Planning Policy Framework (2021), and Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

#### **15. NONSC Water Infrastructure**

Prior to the commencement of the development (not including demolition and site clearance), water infrastructure details shall be submitted to and approved in writing by the Local Planning Authority. This detail shall:-

- i) achieve at least the BREEAM excellent standard for the 'Wat 01' water category 160 or equivalent;
- ii) incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing;
- iii) seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided; and
- iv) take action to minimise the potential for misconnections between foul and surface water networks.

The development must proceed and be occupied in accordance with the approved scheme.

#### REASON

To ensure compliance with Policy SI 5 of the London Plan (2021).

### **16. NONSC Road Safety Audit**

Prior to any above ground works, details of a full Road Safety Audit of the new eastern access point shall be submitted to and approved in writing by the Local Planning Authority.

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

#### REASON

To ensure appropriate servicing of the site, to safeguard highway safety and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policies T3 and T7 of the London Plan (2021).

### **17. COM9 Landscape Scheme**

Prior to the commencement of development above ground, a detailed final landscape scheme shall be 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) demonstrating no net loss of trees, enhanced boundary soft landscaping / screening including around the car park and the provision of large-canopied trees to target urban heat island effects,
- 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 for 14 standard sheffield stands and four enlarged cycle parking bays (18 total) to accord with London Cycle Design Standards;
- 2.c Means of enclosure/boundary treatments
- 2.d Car Parking Layouts, including demonstration that the following is provided:
  - 25 no. car parking spaces provided within the Meadow High School portion of the site (including 2 no. designated disabled bays, 2 no. enlarged bays, 2 no. spaces served by active electric vehicle charging infrastructure and 2 no. spaces served by passive electric vehicle charging infrastructure);

- 14 no. car parking spaces provided within the Harefield Academy portion of the site;
  - 2 no. motorcycle parking spaces.
  - 2.e Hard Surfacing Materials (including a designated safe pedestrian route for drop-off and collection by private car and taxi to the school entrance)
  - 2.f External Lighting
  - 2.g Other structures (such as play equipment and furniture)
  - 2.h Wayfinding/Signage Strategy, including clear legible signage, visual contrast and sensory wayfinding
3. Living/Green Roofs
- 3.a Details of the inclusion of living walls and roofs, including:
- i) Method of construction;
  - ii) Schedule of framework materials;
  - iii) Schedule of the species to be planted, method of planting, height and spread at planting and growth projections;
  - iv) An ongoing management and maintenance regime to include irrigation methods and an inspection programme to allow dead or dying plants to be identified and replaced
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 surfing/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 12, DMHB 14, DMT 2, DMT 6 and DMEI 1 of the Hillingdon Local Plan: Part 2 (2020) and Policies G1, G5, T5 and T6 of the London Plan (2021).

#### **18. NONSC Ecological Enhancement Plan**

Prior to commencement of development above ground, a scheme for the enhancement of ecology shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall set out how the development will contribute positively to ecological value through the use of features and measures within the landscaping (i.e. nectar rich and diverse planting including living walls and/or roofs) and the fabric of the new built form (i.e. bat and bird boxes). This shall achieve biodiversity net gain and shall detail the long-term management and maintenance strategy for such ecological habitat creation.

The development must be built and operated in accordance with the approved scheme.

## REASON

To ensure the development contributes positively to the ecological value of the area in accordance with Policy G5 and G6 of the London Plan (2021) and Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020).

### **19. NONSC Fire Statement**

Prior to first operation of the development, the final comprehensive Fire Statement shall be submitted to and approved in writing by the Local Planning Authority. This should be accompanied by the Building Control Decision Notice or equivalent.

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

## REASON

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

### **20. NONSC External Lighting**

Prior to first operation of the development, details of the external lighting, including light spill diagrams (Lux levels) and maintenance thereafter, shall be submitted to the Local Planning Authority. Thereafter the development shall be carried out and maintained in full accordance with the approved details.

## REASON

To safeguard the amenity of surrounding properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) and Policy EM8 of the Hillingdon Local Plan: Part 2 (2012).

### **21. NONSC Overheating**

Prior to commencement of development (excluding demolition), the final Overheating Strategy shall be submitted to and approved in writing by the Local Planning Authority. The submission shall demonstrate how the development will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

- 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
- 2) minimise internal heat generation through energy efficient design;
- 3) manage the heat within the building through exposed internal thermal mass and high ceilings;
- 4) provide passive ventilation;
- 5) provide mechanical ventilation; and
- 6) provide active cooling systems.

The approved details shall thereafter be implemented and retained for the lifetime of the development.

## REASON

To demonstrate that the final strategy will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy and Policy SI 4 of the London Plan (2021).

## **22. NONSC Energy Monitoring, Recording and Reporting**

Prior to commencement of development (excluding demolition), an updated Energy Statement, including detailed energy monitoring, recording and reporting plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall accord with the requirements of the London Plan (policy SI2) and the GLA Energy Assessment Guidance (2022 or as amended).

The development must proceed in accordance with the approved reporting structure and where there is a failure to achieve the required carbon savings, the quantum (tCO<sub>2</sub>) shall be treated as part of the shortfall and shall result in a cash in lieu contribution in accordance with the formula set out in the S106 agreement.

### **REASON**

To ensure the development's onsite carbon savings from regulated energy demand is achieved in perpetuity (i.e. annually over 30years) in accordance with the Policy SI2 of the London Plan (2021).

## **23. NONSC Verification and Management Maintenance Report Verification**

Prior to first operation of the development, a Verification Report demonstrating that the approved drainage/SuDS measures have been fully implemented shall be submitted to and approved in writing by the Local Planning Authority. This report must include:

- As built drawings and CAD/shapefiles for GIS of all the elements sustainable drainage systems including level information (if appropriate);
- Photographs of the completed sustainable drainage systems throughout the construction process;
- Any relevant certificates from manufacturers/suppliers of any drainage features; and
- A confirmation statement of the above signed by a chartered engineer.

### **REASON**

To ensure the sustainable management of water, minimise flood risk, minimise discharge of surface water outside of the curtilage of the property and ensure that the drainage system will remain functional throughout the lifetime of the development in accordance with Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policy DME1 10 of the Hillingdon Local Plan: Part 2 (2020).

## **24. NONSC Circular Economy Monitoring Report**

Prior to first operation of the development, a post-construction monitoring report should be completed in line with the Greater London Authority's (GLA) Circular Economy Statement Guidance.

The post-construction monitoring report shall be submitted to the GLA, currently via email at: [circulareconomystatements@london.gov.uk](mailto:circulareconomystatements@london.gov.uk), along with any supporting evidence as per the guidance.

Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to operation of the development.

### **REASON**

In the interests of sustainable waste management and in order to maximise the re-use of materials, in accordance with Policy SI 7 of the London Plan (2021).

## **25. NONSC Whole Life-Cycle Carbon Assessment**

Prior to the first operation of the development the post-construction tab of the Greater London Authority's (GLA) Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance.

The post-construction assessment should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance.

Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to operation of the development.

#### REASON

In the interests of sustainable development and to maximise on-site carbon dioxide savings, in accordance with Policy SI 2 of the London Plan (2021).

### **26. NONSC Parking Design and Management Plan**

Prior to the operation of the development, a Parking Design and Management Plan should be submitted to detail how the car parking and cycle parking will be designed, managed and maintained, with reference to a pupil pick-up and drop-off strategy and Transport for London guidance on parking management and parking design. It should also set out the methodology behind the allocation/control of parking places which can be supported by enforcement structures that encourage the correct use of parking places which assists in ensuring that parking demand and allocation is properly managed. It should also detail how demand for electric vehicle charging provision is monitored.

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

#### REASON

To ensure an unhindered and functional operation for all parking spaces and drop-off/pick-up areas within the site, in accordance with Policies T4 and T6 of the London Plan (2021) and Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020).

### **27. NONSC Delivery and Servicing Plan**

Prior to first operation of the development, details of a finalised Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority.

This should be in accordance with Transport for London's Delivery and Servicing Plan Guidance. Thereafter the development shall be carried out and maintained in full accordance with the approved details.

#### REASON

To ensure appropriate servicing of the site, to safeguard highway safety and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policies T3 and T7 of the London Plan (2021).

### **28. NONSC Drop-off and Collection Details**

Prior to first operation of the development, details of the arrangements for drop-off and collection of students by private car and taxi shall be submitted to and approved in writing by the Local Planning Authority. This should include clarification to explain how a designated safe pedestrian route, which

is the shortest possible distance, between the drop-off/collection point and the school entrance is being provided, and whether there will be any modification to these spaces to provide sheltered, accessible waiting spaces.

#### REASON

To ensure an unhindered and functional operation for all parking spaces and drop-off/pick-up areas within the site, in accordance with Policies T4 and T6 of the London Plan (2021) and Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020).

### **29. COM31 Secured by Design**

The building(s) 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 exercising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 to ensure the development provides a safe and secure environment in accordance with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) and Policy D11 of the London Plan (2021).

### **30. NONSC Contaminated Land**

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. Prior to first operation of the development, all imported soils shall be tested for chemical contamination, and the results of this testing shall be interpreted and submitted, in report form, for written approval by the Local Planning Authority.

#### REASON

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

### **31. 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. The planting 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 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. I52 **Compulsory Informative (1)**

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

#### 2. I70 **LBH worked applicant in a positive & proactive (Granting)**

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

#### 3. I72 **Section 106 Agreement**

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

#### 4. I25 **Consent for the Display of Adverts and Illuminated Signs**

This permission does not authorise the display of advertisements or signs, separate consent for which may be required under the Town and Country Planning (Control of Advertisements) Regulations 1992. For further information and advice, contact - Residents Services, 3N/04, Civic Centre, High Street, Uxbridge, UB8 1UW (Tel. 01895 250574).

#### 5.

a) The Equality Act 2010 seeks to protect people accessing goods, facilities and services from



discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.

b) Fixtures, fittings and furnishings, particularly hard materials should be selected to ensure that sound is not adversely reflected. The design of all learning areas should be considerate to the needs of people who are hard of hearing or deaf. Reference should be made to BS 8300:2018 and, BS 223 in selecting an appropriate acoustic absorbency for each surface.

c) Care should be taken to ensure that the internal decoration achieves a Light Reflectance Value (LRV) difference of at least 30 points between floor and walls, ceiling and walls, Including appropriate d cor to ensure that doors and door furniture can be easily located by people with reduced vision.

d) Induction loops should be specified to comply with BS 7594 and BS EN 60118-4, and a term contract planned for their maintenance.

e) Care must be taken to ensure that overspill and/or other interference from induction loops in different/adjacent areas does not occur.

f) Flashing beacons/strobe lights linked to the fire alarm should be carefully selected and installed to ensure they remain within the technical thresholds not to adversely affect people with epilepsy.

## 6.

Please be advised that a Groundwater Risk Management Permit from Thames Water will be required for any discharging of 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. Thames Water would expect the developer to demonstrate what measures they 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](mailto:trade.effluent@thameswater.co.uk) . Application forms should be completed online on the Thames Water website.

### 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 (2021) and national guidance.

DMCI 1	Retention of Existing Community Sport and Education Facilities
DMCI 1A	Development of New Education Floorspace
DMCI 2	New Community Infrastructure
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination

DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 3	Locally Listed Buildings
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D8	(2021) Public realm
LPP G1	(2021) Green infrastructure
LPP G2	(2021) London's Green Belt
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP HC1	(2021) Heritage conservation and growth
LPP M1	(2021) Monitoring
LPP S3	(2021) Education and childcare facilities
LPP S5	(2021) Sports and recreation facilities
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T4	(2021) Assessing and mitigating transport impacts

LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction
NPPF11	NPPF 2021 - Making effective use of land
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF13	NPPF 2021 - Protecting Green Belt Land
NPPF15	NPPF 2021 - Conserving and enhancing the natural environment
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment
NPPF2	NPPF 2021 - Achieving sustainable development
NPPF4	NPPF 2021 - Decision-Making
NPPF8	NPPF 2021 - Promoting healthy and safe communities
NPPF9	NPPF 2021 - Promoting sustainable transport

### **3. CONSIDERATIONS**

#### **3.1 Site and Locality**

The site forms part of the Harefield Academy, a secondary school and sixth form, located in Harefield. More specifically, the site comprises a vacant and decommissioned residential school building previously occupied by Watford Football Club Academy. The site is located to the west of Northwood Road and is currently accessed from the south-west side via Northwood Way.

Notably, the site forms part of designated Green Belt land. The site is subject to some surface water flooding. Transport for London's WebCAT planning tool also indicates that the site has a poor Public Transport Accessibility Level of 1a.

#### **3.2 Proposed Scheme**

This application seeks permission for the demolition of the former residential school block and construction of a new SEND academic building (Class F1) as well as ancillary structures, including heat pump and substation enclosures, a multi-use games area ('MUGA'), revised vehicular access, landscaping, car and cycle parking, and associated works. The proposal would cater for up to 90 SEND pupils aged 11-19 and 45 staff.

The proposed development would be a satellite unit of Meadow High School, a local authority-maintained community special school, located approximately 10 kilometres south of Harefield Academy in the Colham & Cowley Ward.

#### **3.3 Relevant Planning History**

17709/APP/2022/1387      Harefield Academy Northwood Way Harefield

Change of use of former residential school (Use Class C2) to education facility (Use Class F.1), two

storey extension to provide additional teaching space, construction of a Multi-Use Games Area, revised vehicular access, landscaping, car and cycle parking, and associated works.

**Decision:** 26-07-2022      Approved

### **Comment on Relevant Planning History**

Planning application reference 17709/APP/2009/624 granted permission on 18th September 2008 for the erection of a three storey building to provide accommodation for 50 boarders and 4 staff with ancillary amenity space, landscaping, car parking and biomass boiler enclosure. This permission was implemented and comprises the Lord Adonis House building, which is the subject of the current planning application.

Planning application reference 17709/APP/2022/1387 granted permission on 13th February 2023 for the change of use of former residential school (Use Class C2) to education facility (Use Class F.1), two storey extension to provide additional teaching space, construction of a Multi-Use Games Area, revised vehicular access, landscaping, car and cycle parking, and associated works. Following the grant of permission, the applicant has reported the following issues with the implementation of this permission:

- 1) Structural Incompatibility: The existing CLT structure did not meet the specific requirements for a SEND/BB104 facility. The requirement provisions for accessibility, fire safety, and the structural integrity necessary for an educational environment were compromised due to the low floor-to-floor height reducing the ability to create appropriate teaching spaces within the building.
- 2) Compliance Issues: The existing building couldn't be brought up to code compliance without significant structural modifications.
- 3) Safety Concerns: Safety is a primary concern in educational settings. The existing building is unable to meet safety standards, particularly in terms of fire safety and structural concerns around the existing foundations.

## **4. Planning Policies and Standards**

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

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

- The Local Plan: Part 1 - Strategic Policies (2012)
- The Local Plan: Part 2 - Development Management Policies (2020)
- The Local Plan: Part 2 - Site Allocations and Designations (2020)
- The London Plan (2021)
- The West London Waste Plan (2015)

The National Planning Policy Framework (NPPF) (2023), Planning Practice Guidance, as well as

relevant supplementary planning documents and guidance are all material consideration in planning decisions.

The proposed development has been assessed against development plan policies and relevant material considerations.

### **Local Plan Designation and London Plan**

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

Part 1 Policies:

PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains

PT1.BE1 (2012) Built Environment

PT1.CI1 (2012) Community Infrastructure Provision

PT1.CI2 (2012) Leisure and Recreation

PT1.EM1 (2012) Sustainable Waste Management  
1

PT1.EM5 (2012) Sport and Leisure

PT1.EM6 (2012) Flood Risk Management

PT1.EM8 (2012) Land, Water, Air and Noise

PT1.HE1 (2012) Heritage

Part 2 Policies:

DMEI 10 Water Management, Efficiency and Quality

DMEI 1 Living Walls and Roofs and Onsite Vegetation

DMHB 12 Streets and Public Realm

LPP D12 (2021) Fire safety

LPP D3 (2021) Optimising site capacity through the design-led approach

LPP D4 (2021) Delivering good design

LPP D8 (2021) Public realm

DMEI 14 Air Quality

DMEI 2 Reducing Carbon Emissions

DMCI 1 Retention of Existing Community Sport and Education Facilities

DMCI 1A Development of New Education Floorspace

DMCI 2 New Community Infrastructure

DMCI 7 Planning Obligations and Community Infrastructure Levy

DMEI 12 Development of Land Affected by Contamination

DMEI 4 Development on the Green Belt or Metropolitan Open Land

DMEI 7 Biodiversity Protection and Enhancement

LPP G1 (2021) Green infrastructure

LPP G2 (2021) London's Green Belt

LPP G5 (2021) Urban greening

LPP G6 (2021) Biodiversity and access to nature

LPP G7 (2021) Trees and woodlands

LPP M1 (2021) Monitoring

LPP T1 (2021) Strategic approach to transport

LPP T2 (2021) Healthy Streets

LPP T5 (2021) Cycling

LPP T6 (2021) Car parking

LPP T6.5 (2021) Non-residential disabled persons parking

NPPF13 NPPF 2021 - Protecting Green Belt Land

DMEI 9 Management of Flood Risk

DMHB 1 Heritage Assets

DMHB 11 Design of New Development

DMHB 14 Trees and Landscaping

DMHB 15 Planning for Safer Places

DMHB 3 Locally Listed Buildings

DMHB 4 Conservation Areas

DMHB 7 Archaeological Priority Areas and archaeological Priority Zones

DMT 1 Managing Transport Impacts

DMT 2 Highways Impacts

DMT 6 Vehicle Parking

LPP D11 (2021) Safety, security and resilience to emergency

LPP D14 (2021) Noise

LPP D5 (2021) Inclusive design

LPP HC1 (2021) Heritage conservation and growth

LPP S3 (2021) Education and childcare facilities

LPP S5 (2021) Sports and recreation facilities

LPP SI1 (2021) Improving air quality

LPP SI7 (2021) Reducing waste and supporting the circular economy

LPP SI12 (2021) Flood risk management

LPP SI13 (2021) Sustainable drainage

LPP SI2 (2021) Minimising greenhouse gas emissions

LPP T4 (2021) Assessing and mitigating transport impacts

LPP T7 (2021) Deliveries, servicing and construction

NPPF11 NPPF 2021 - Making effective use of land

NPPF12 NPPF 2021 - Achieving well-designed places

NPPF15 NPPF 2021 - Conserving and enhancing the natural environment

NPPF16 NPPF 2021 - Conserving & enhancing the historic environment

NPPF2 NPPF 2021 - Achieving sustainable development

NPPF4 NPPF 2021 - Decision-Making

NPPF8 NPPF 2021 - Promoting healthy and safe communities

NPPF9 NPPF 2021 - Promoting sustainable transport

## **5. Advertisement and Site Notice**

5.1 Advertisement Expiry Date: **18th October 2023**

5.2 Site Notice Expiry Date: **18th October 2023**

## **6. Consultations**

### **External Consultees**

A total of 299 properties were sent consultation letters, an advert was posted in the local paper and a site notice was displayed to the front of the site. All forms of consultation expired on 18th October 2023. One objection from a neighbouring resident has been received and is summarised as follows:

- 1) The new vehicular access is dangerous
- 2) Houses opposite the vehicular access will struggle to turn in
- 3) Impact of noise increased
- 4) Impact on house value

### **PLANNING OFFICER COMMENT:**

All matters relating to highway and pedestrian safety is considered by the Council's Highways Authority and is addressed within the main body of the report. The Council's Noise Specialist has also been consulted with regard to noise issues. It is also noted that any impact to property values is not a material planning consideration.

### **NATIONAL AIR TRAFFIC SERVICES:**

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains the LPA's responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

### **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. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. 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.

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](mailto:trade.effluent@thameswater.co.uk). Application forms should be completed online.

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.

The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available online) and may wish to discuss the implication for their development with a suitably qualified environmental consultant.

#### SPORT ENGLAND:

In light of Sport England's previous comments on planning application (LPA reference - 17709/APP/2022/1387) which followed detailed discussions with the applicant and the Council, Sport England raises no objection to this application.

However, it is noted that the planning conditions attached to the original consent required the applicant to provide a parking management scheme for the site. It is advised that if a similar planning condition is applied to any forthcoming new planning consent for the site, the applicant should be required to confirm that the large existing car parking area included within the red line will not be affected by the proposal. For example, confirmation that it will continue to be made available to those using the Harefield Academy sports facilities (including the Northwood Football Academy).

#### PLANNING OFFICER COMMENT:

The arrangements for the main car park are as per the previously approved design for the extension scheme. In order to avoid overspill of staff car parking, some staff will be permitted to park within the underutilised Harefield Academy car park. A total of 14 spaces are expected to be secured by prior agreement with the Academy. The current car park is underutilised therefore the use of some spaces for staff parking will not affect the existing use of the car park and access arrangements for those using the Academy Sports Facilities will be unaffected by the proposed development.

#### TRANSPORT FOR LONDON - RAILWAY INFRASTRUCTURE:

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

#### GREATER LONDON ARCHAEOLOGICAL ADVISORY SERVICE:

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF section 16 and the London Plan (2021 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 planning application is not in an Archaeological Priority Area.

There are few recorded archaeological finds in the vicinity of this site and overall it would appear to have low archaeological potential.

No further assessment or conditions are therefore necessary.

#### DENHAM AERODROME:

We would like to draw attention to the fact that the site is within the Denham Aerodrome Traffic Zone. Denham is a long established Civil Aviation Authority Licensed Aerodrome providing facilities for business aviation and flying training for both fixed and rotary wing aircraft, and may be available for use at any time. It is inevitable that any occupants in this location will both hear and see aircraft operations including aircraft and it is important that all concerned are aware of the juxtaposition of the sites.

#### LONDON FIRE BRIGADE:

The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have the following observations;

## Dead-End Corridors

- On the Proposed Ground Floor, the corridor leading to the "Head Office/Finance" and "Deputy Head/Meeting" rooms is considered a dead-end corridor. BB100:2007 states that "dead end corridors should not be included in new buildings". Ensure that the current dead-end situation is considered, and suitable arrangements are made to ensure compliance.
- On the Proposed First Floor, the corridor leading to the "WC Pupil" and "Occupational Therapy" rooms is considered a dead-end corridor. See above for comments on dead-end situations.

## Inner Rooms

- There are multiple cases of inner rooms throughout the Proposed First Floor, specifically all "Breakout room", "Physio Store", "Food Tech Store" and the "Store" rooms within classrooms. Ensure that these areas are considered, and suitable arrangements are made to ensure compliance. Guidance on what provisions should be made to accommodate Inner Rooms is found in BB100:2007 section 4.3.2.6 and BS9999:2017 section 16.3.4.

It should be ensured that if any material amendments to this consultation is proposed, a further consultation will be required.

I also enclose Guidance note 29 on Fire Brigade Access similar to that in B5 of the Building Regulations, Particular attention should be made to paragraph 16, Water Mains and Hydrants, by the applicant.

If there are any deviations from the guidance in ADB) Vol 1 and 2: B5 Access and facilities for the fire service in relation to water provisions, then this information needs to be provided to the Water Office ([water@london-fire.gov.uk](mailto:water@london-fire.gov.uk)) to discuss the proposed provision.

If there are any deviations to Brigade access and facilities, then this information needs to be provided to Fire Safety Regulation ([FSR-AdminSupport@london-fire.gov.uk](mailto:FSR-AdminSupport@london-fire.gov.uk)) to review the proposed provision. Once we have received this information then the LFB can provide a response on the consultation and advice in regard to hydrants upon receipt of an appropriate site plan showing premises layout, access to it, and water supply infrastructure if available.

## GREATER LONDON AUTHORITY STAGE 1 (Summary):

Land use principles: The proposed demolition of the former boarding block and construction of a new Special Education Needs and Disabilities ('SEND') school is accepted in principle. The proposal would involve redevelopment of a previously developed Green Belt site, which would meet the NPPF exception to inappropriate development.

Urban Design: The applicant should explore whether the site layout could be optimised to better respond to the existing campus and improve access and legibility. Further improvements to the proposed public realm strategy should be explored. A revised fire statement is required to demonstrate compliance with Policy D12.

Transport: Further information is required in relation to the Active Travel Zone assessment; site wayfinding and legibility; and proposed quantum of car parking.

Other issues on sustainable development and environmental issues also require resolution prior to the Mayor's decision making stage.

## Recommendation

That Hillingdon Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 110. Possible remedies set out in this report could address these deficiencies. The Mayor does not need to be consulted again if the borough decides to refuse the application.

## PLANNING OFFICER COMMENT:

The applicant has submitted responses to the matters raised by the GLA in their Stage 1 response. It is considered that these matters can be satisfactorily resolved through planning conditions, obligations and minor revisions to supporting documents, in consultation with the GLA prior to the issue of the Stage 2 response.

## Urban Design

The architects have provided an updated design rationale for the proposed site layout, in respect of responsiveness to the Harefield Academy campus, accessibility and legibility.

The submission advises that having a secure site and outdoor play spaces is one of the main drivers when starting the design process for a SEND school. The transition arrival journey has been carefully considered as the pupils arrive to the school by minibus and after they enter the drop-off area they are welcomed in a safe and calming area away from the staff car park which is located to the north of the site. The drop-off area is positioned directly in front of the main entrance and pupil's entrance, and is an air-lock safe space where pupils will disembark. During the school hours the secured drop-off area Plaza will be used as a play area. As part of the landscape design the main access into the school is easily identifiable with the use of trees framing the entrance. The fenestration curtain wall of the pupil's entrance is easily identifiable and features a double height space that brings daylight into the area.

One of the key elements for the school design was to prioritize the safety and security features, including clear wayfinding, privacy screening from the road and the adjacent Harefield Academy. It was established early on in the design process by the school that the parents of the attending pupils have concerns regarding the interactions between the two schools. Addressing those concerns, the drop-off area is away from the view of the Mainstream Secondary Academy and careful considerations were given to planting and screening from the car park and MUGA play area. The two schools will operate independently and do not intend to have any shared student spaces in the future that may compromise the well-being and mental health of the pupils.

The siting and number of utility structures have also been selected due to the available infrastructure on site, existing service points and needs of the building whilst also minimising the impact on outdoor space for pupils.

Nevertheless, Conditions 9 and 10 have been included in the recommendation requiring the submission of final details of the primary entrance to the school (notwithstanding the approved drawings), and the final details of the ancillary utility structures, including consolidation if possible.

Therefore it is considered that the urban design matters raised in the Stage 1 response can be satisfactorily resolved with the GLA.

## Transport

The applicants' Transport Consultant has submitted an advice note in response to the transport matters

raised in the GLAs Stage 1 report. This provides a review of the submitted ATZ concluding that the local highway network is suitable for all of the expected users travelling to the site, and that good quality footways and pedestrian crossings within the vicinity of the site is suitable for all users of varying access requirements. This is accepted.

Conditions have been included requiring the submission of a construction management and logistics plan; a road safety audit; quantum of car, motorcycle and cycle parking; provision of electric vehicle charging points; parking design and management plan; delivery and servicing plan; and drop off and collection details. It is considered that the transport matters raised in the Stage 1 response can be satisfactorily resolved subject to conditions.

#### Other Matters

Other matters raised in the GLA Stage 1 response concern submitted documents, which whilst generally in accordance with planning policy, require amendments to fully comply. This includes the fire statement, the energy strategy, the whole life-cycle carbon assessment, the circular economy statement, the surface water drainage strategy and water efficiency. Conditions are included requiring the submission of these revised documents. Nevertheless, the applicant will submit these revised documents for these matters to be resolved prior to the issue of the Stage 2 response.

#### Internal Consultees

##### SCHOOL PLACES PLANNING AND POLICY MANAGER:

Hillingdon as a local authority has a legal duty to provide pupils with sufficient school places to meet residents needs. This includes pupils who need places in special schools, for which demand in Hillingdon continues to rise, as nationally. All existing special schools and special resources places provision are full, some beyond capacity, but demand is still rising from pupils with statutory EHCPs and the cost of buying independent places outside the borough leads to long journeys for pupils and has led to a growing deficit on the LA Dedicated schools Grant which is unsustainable.

Following consultation with schools and DfE, in March 2022 the LA agreed a Deficit Valve Plan with DfE to reduce costs, increase early interventions in mainstream and create new specialist places, in addition to those new schools in development. This expansion of Meadow onto a satellite site at the edge of the Harefield academy site (this has been applied for in a separate application) is the largest capital project in that plan, and so is strategically critical to reducing the deficit.

In March 2022, Cabinet approved this scheme for Meadow High School, the only special school in the borough for secondary aged pupils with moderate learning difficulties and other complex needs including autism. The roll has grown to maximum capacity but demand for places from residents continues to rise. 82 places are in dilapidated units due for removal, so the LA faced a large loss of places as this is the only site for buildings without taking the necessary external play space needed for pupils. Admissions would therefore have to stop completely for a few years to empty, demolish and rebuild. Only by moving out all the 65 Pathway One pupils together can the main site be rearranged to enable demolition, rebuilding and have capacity for new pupils.

The proposed application will enable the demolition of former residential school and erection of academic building at the satellite provision at Lord Adonis House, Harefield Academy, Northwood Way to add 90 permanent places for Pathway One pupils. Therefore allowing 90 places will be built on each site; at Royal Lane and Northwood Way.

## ACCESS OFFICER:

This proposal seeks to reconstruct Meadow High Satellite School. The aim is to establish a secure and practical setting that fulfils the requirements of its designated SEND students. The intention is understood to achieve a new building that provides increased flexibility for an optimal environment to meet the specific requirements of SEND students whilst meeting Building Bulletin 104 requirements.

London Plan policy D5 and D12 are applicable to this application, therefore, the highest standards of Inclusive Design should be secured as a pre-requisite to any approval.

Plans are fundamentally acceptable for the intended school, however, the following concerns should be addressed on a revised plans set of plans.

1. The new school building should incorporate a Changing Places room for disabled children who have complex personal care needs. A minimum of one room designed to meet Changing Places technical specifications should be shown on plan. However, given the nature of the building a room should be provided on the ground and the first floor.
2. To support the principle and spirit of inclusive access, a minimum of two lifts should be provided to ensure reliable and uninterrupted step free access to the first floor. Such provision is important to ensure reliable means of access to those unable to use the stairs during times of routine maintenance, lift breakdowns, and to ensure there is sufficient lift capacity for evacuation purposes.
3. A minimum of one fire evacuation lift must be provided within this new school structure. The lift should be designed to accord with the technical specifications set out in BS EN 81-76, BS 9991 or BS 9999.
4. An emergency evacuation plan/fire strategy that is specific to the evacuation of persons unable to escape by stairs should be submitted and reviewed prior to any grant of planning permission.

Conclusion: Additional details are required in respect of points 1 to 4 above.

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

### Recommended Informatives

- a) The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.
- b) Fixtures, fittings and furnishings, particularly hard materials should be selected to ensure that sound is not adversely reflected. The design of all learning areas should be considerate to the needs of people who are hard of hearing or deaf. Reference should be made to BS 8300:2018 and, BS 223 in selecting an appropriate acoustic absorbency for each surface.
- c) Care should be taken to ensure that the internal decoration achieves a Light Reflectance Value (LRV) difference of at least 30 points between floor and walls, ceiling and walls, Including appropriate d cor to ensure that doors and door furniture can be easily located by people with reduced vision.

d) Induction loops should be specified to comply with BS 7594 and BS EN 60118-4, and a term contract planned for their maintenance.

e) Care must be taken to ensure that overspill and/or other interference from induction loops in different/adjacent areas does not occur.

f) Flashing beacons/strobe lights linked to the fire alarm should be carefully selected and installed to ensure they remain within the technical thresholds not to adversely affect people with epilepsy.

#### PLANNING OFFICER COMMENT:

Drawing reference TVC0024-NOV-V1-XX-DR-A-PL20 Rev. P01 was submitted in response to comments received from the Access Officer.

#### ACCESS OFFICER FOLLOW-UP:

Thank you for following up on my comments and for securing the changes made to the plans.

The feedback received overcomes the previous accessibility objections with no further matters of concern.

#### NOISE SPECIALIST:

Given the nature and context of the proposed development apparent from the information provided I do not consider noise and vibration to be a material planning issue.

#### URBAN DESIGN OFFICER:

##### 1.Summary

Due to a lack of evidence that demolition is the only option, the principle of demolition cannot be supported. The applicants are urged to implement the existing consent for retention and extension, or propose required modifications to the approved plans, whilst retaining as much of the existing building as possible.

Comment and/or Action - Information required

Provide detailed evidence to support demolition  
Provide sections to show visibility of taller building frontage

##### 2.Context

###### Existing Building (2010):

The existing building on the site is a relatively new residential school building, built in 2010 to high sustainability standards, including a CLT (Cross-laminated Timber) structure.

###### Existing Permission (2023):

Earlier this year, an application was approved to re-use the existing building and extend it to the front of the site, to use it as a SEND school. The DAS states that "Re-purposing the redundant residential building towards a new active community use is a highly sustainable approach by the school. The existing building is only 11 years old and as such has reasonably good levels of thermal performance and energy use". The

approved building was designed to meet all relevant requirements and regulations.

#### Current Application (2023):

Half a year after the decision notice, an application is submitted for the full demolition of the existing building, citing 'significant challenges' with the existing structure, even though the relevant constraints were fully known and considered in the approved proposals. The Design and Access Statement states that "the existing building couldn't be brought up to code compliance without significant structural modifications", which implies that making these modifications would resolve the issues. The Circular Economy Statement that "several options to avoid full demolition of the existing building were considered, however, none of these were concluded as feasible". The options are not included or discussed within the application.

The detailed designs and supporting information recently submitted and approved indicate that retention would be feasible. The current application is considered to lack evidence that the existing building cannot be retained, either as approved or with modifications. Therefore, the principle of demolition cannot be supported.

The current proposals would not comply with the London Plan Guidance Housing Standards, Policy A1.2 (London Plan Policies SI 2 and SI 7).

The rest of this assessment will look at other elements in isolation.

#### 3.Designations

The site is located within the Greenbelt. The proposed new building, with a 50% greater footprint and similar height, would have a greater effect on the openness of the Greenbelt than the smaller existing building.

There are no heritage designations affected by the proposals.

#### 4.Height Scale and Massing

The proposed floorspace is just 12sqm (0.5%) larger. The proposed height of the proposed building is comparable to the previous consent, as are the siting and massing. However, the height of the front part of the building, facing Northwood Road, is now about 50% taller than the existing permission. Visibility of the existing building is relatively limited due to the screening by existing trees and vegetation along the site boundary. However, the proposed building would be a lot closer to the road and with the now increased height could become visible over the relatively low vegetation, particularly from the residential buildings opposite on Northwood Road. Sections showing this potential impact on the homes opposite does not seem to be included and would be needed to judge this aspect properly.

The proposals would be considered to be acceptable in design and conservation terms.

#### 5.Layout and Landscape

The internal layout, as well as the external landscaping are very similar and considered suitable for the intended use.

#### 6.Appearance

The massing of the large building is sufficiently broken up, similar to the consented building. The proposed



materials, largely buff brick, with small elements of brown cladding and dark feature brick, are considered appropriate, subject to detailed materials. Brown would also be the preferred colour for the feature brick, to best fit with the rest of the building.

#### PLANNING OFFICER:

Further information was submitted by the Applicant and the Urban Design Officer was re-consulted.

#### URBAN DESIGN OFFICER FOLLOW-UP:

##### 1. Summary

Since the previous comments in August and September, most of these comments have now been addressed. However, there are outstanding concerns about the justification of demolition, the site layout and the building layout, as outlined below.

##### 2. Visual Impact and Greenbelt

The LVIA provides sufficient comfort that the visual impact of the proposed building, somewhat lower than the previous proposal, is considered acceptable in design terms.

Compared to the existing building, the proposed new building, with a 50% greater footprint and similar height, would have a greater effect on the openness of the Greenbelt. However, compared to the permitted building, it would not be considered to have a significantly larger impact on the openness of the Greenbelt.

##### 3. Demolition

It is still not clear that the burden of proof has been met for the justification of demolition. In terms of sustainability, retention of the existing building, as proposed in the application permitted earlier this year, is still the preference.

More certainty on the feasibility of the four proposed foundation solutions is expected, to identify whether they can resolve the issues and facilitate retention of the building. Lack of certainty at this stage or potential difficulties would not necessarily justify demolition, as the relevant investigations and expert advice may overcome these issues.

##### 4. Site layout

The red line boundary includes the large existing car park to the west of the building, which is thought to have some spare capacity. Therefore, it would be the preference to amalgamate both car parks into one more efficient one. This would free up space for green space, playground area, etc. and have a reduced impact on the green character of the Greenbelt. It has not been sufficiently justified why this approach would not be feasible.

##### 5. Building layout

The location and design of the entrances seems to be sub-optimal. The main entrance is not that close to the car park and hidden around a corner, so not very visible. It is not clear why there should be a different entrance for pupils as they are the main users of the building. If this would be needed, then an entrance to the northeast facade, in front of the play area seems more suitable. A small canopy above the pupil's entrance would also be appropriate.

## PLANNING OFFICER:

Please see Section 07.05 of the report for consideration of Green Belt matters.

With respect to the Urban Design Officer's comments concerning the principle of demolition, the Applicant Team have advised that the justification for demolition is threefold:

1. Structural Incompatibility: The existing CLT structure did not meet the specific requirements for a SEND/BB104 facility. The requirements provisions for accessibility, fire safety, and the structural integrity necessary for an educational environment were compromised due to the low floor-to-floor height and the ability to create appropriate teaching spaces within the building;

2: Compliance Issues: The existing building couldn't be brought up to code compliance without significant structural modifications;

3. Safety Concerns: Safety is a primary concern in educational settings. The existing building's inability to meet safety standards, particularly in terms of fire safety and Structural concerns.

Officers would note that Part 11, Schedule 2, of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) establishes permitted development rights for demolition of buildings, including residential buildings, without requiring justification in respect of sustainability principles. Taking into account this material planning consideration, Officers would not raise an objection to the principle of demolishing the existing building.

Regarding comments made in respect of site layout, it is appreciated that it may be more efficient for the two car parks to be amalgamated. However, this is not the proposal and is not considered to be form a robust reason for refusal.

Regarding the location of the entrance, this has been proposed on the eastern side of the building and is next to where pupils will be dropped-off on their arrival to the school. For the users of the site, this being school children and staff, the location of the entrance is considered to be appropriate.

## HIGHWAYS AUTHORITY:

### Site Characteristics & Background

Harefield Academy is a secondary school with a sixth form situated off Northwood Road and is physically accessed by vehicles and pedestrians via Northwood Way in a segregated manner. Earlier this year, permission (17709/APP/2022/1387) was granted for the expansion of the site envelope by way of incorporating a SEND educational facility which is to be relocated from Meadow High School located in Uxbridge creating what is effectively a satellite site for the said. The facility was proposed to have been housed within an existing and extended block (Lord Adonis House) together with a new pedestrian and vehicular access situated on Northwood Road. This 'existing' block has now been structurally appraised and is not considered economically viable to adapt to current legislative building requirements. A new build is therefore proposed and forms the main basis of this new application with an overall new floor area that would broadly remain comparable to the previous permission.

Harefield Academy exhibits a patronage of 317 pupils and 52 staff and the already agreed expansion results in 90/45 additional pupils/staff respectively. A 107 space car park for staff, visitor, parent and sixth form pupil use is provided due south of the main school block and includes 'drop-off' areas and a further 6

disabled compliant bays are situated in a small separate car park located to the far west.

An existing hardstanding area located in the far north-eastern corner of the site is to be repurposed with 25 car parking spaces inclusive of one visitor and two disabled compliant spaces with appropriate lighting provision. A new multi-use games area (MUGA) and outdoor sports area remain inclusive to the proposal.

As part of the 2022 permission, a new vehicular, pedestrian/cycle 'bell-mouth' access allowing two-way traffic movement from Northwood Road has now been implemented at a point previously used for construction purposes during the original academy build (to be reprised with this current proposal). This arrangement designates the existing access from Northwood Way as secondary and allows for an informal one-way 'drop off and pick up' facility commencing through the latter with vehicles including mini-buses emerging onto Northwood Road. This allows for any queuing of vehicles to occur within rather than outside of the school envelope which is understandably beneficial to the local highway network.

### Appraisal

In terms of highway/transport implications, the principle of the overall development remains acceptable, and this new application does not influence or alter the conclusions reached within the determination of the earlier 2023 permission (17709/APP/2022/1387). Hence, the said appraisal & conclusions can be reprised which includes the S106 legal agreement 'Statement of Intent' (13th February 2023) which remains valid. The submitted and updated 'Delivery & Service' plan is noted and considered fit for purpose. There are no further observations or impositions.

### Conclusion

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress and would not raise any measurable traffic generation/highway safety concerns, in accordance with Local Plan: Part 2 Development Plan (2020) Policies DMT 1, DMT 2 & DMT 6 and Policies T4, T5 and T6 of the London Plan (2021).

### FLOOD AND WATER MANAGEMENT SPECIALIST:

#### a) Review Summary

This application has not sufficiently demonstrated the use of the London Plan's drainage hierarchy and is proposing the following key items:

- Type of development: Demolition of former residential school and erection of academic building and ancillary structures including heat pump and substation enclosures, construction of a multi-use games area, revised vehicular access, landscaping, car and cycle parking and associated works.
- Flood risk: The site is not within an area of flood risk and is not likely to impact upon flood risk within the wider catchment.
- Types of conveyance / attenuation features: The applicant has proposed an attenuation tank to provide surface water storage to accommodate all design storm events. Surface water discharge will be restricted via a flow control device.
- Runoff rate restriction (l/s): The proposed runoff rate of 5 l/s is below the 1 in 100-year greenfield runoff rate (6.73 l/s)

- Runoff attenuation volume (m3): 328m3

- Maintenance plan: Maintenance tasks and frequencies have been stated for the permeable paving and geocellular attenuation tanks, however if further SuDS are proposed these will need to be included within the maintenance strategy.

#### b) Recommendation and Requests

We object to the application for the following reasons:

- The drainage strategy states that Sustainable Drainage Systems in the form of green/brown roofing, rainwater harvesting, permeable surfaces, and bioretention areas may be included within the site design. This should be confirmed as it is unclear whether these will be included in the final design of the development. All proposed SuDS should be included on the drainage drawing.

- The existing runoff volume has not been provided, and it is unclear what the proposed runoff volume is.

- It has not been demonstrated that there will be no flooding of buildings on the site in the 1 in 100 year rainfall event.

- The applicant has not consulted Thames Water on the proposed connection point and discharge rate.

To address the above, please can the applicant submit information which:

- Demonstrates that green/brown roofing, rainwater harvesting, permeable surfaces, and bioretention have been included in the design, or justify why these have not been implemented.

- The existing runoff volume and proposed runoff volume from the site (as shown in the calculations on PDF page 51 of the Drainage Strategy) should be clarified.

- Calculations should be provided for the 1 in 100 year rainfall event without a climate change consideration. Exceedance flow pathways for the 1 in 100 year rainfall event plus 40% climate change should be added to the drainage drawing.

- Demonstrates the maintenance tasks and frequencies have been stated for any further SuDS that are proposed.

- Confirms that Thames Water has been consulted on the proposed connection point and discharge rate.

#### PLANNING OFFICER COMMENT:

Amended documentation was submitted in response to the objection received from the Council's Flood and Water Management Specialists. This issue is considered further within the main body of the report.

#### WASTE STRATEGY OFFICER:

Having reviewed the submitted details I have no comments or objections to make.

#### PLANNING POLICY OFFICER:

The proposal is for the demolition of former residential school (Use Class C2) and erection of an education

facility (Use Class F.1), construction of a Multi-Use Games Area, revised vehicular access, landscaping, car and cycle parking, and associated works. The site is wholly located within the Green Belt. It is therefore necessary to consider whether the proposals are permissible under the exceptions outlined in Paragraph 149 and 150 of the NPPF (2023).

A previous scheme was approved for a two-storey extension to provide additional teaching space, construction of a MUGA, revised vehicular access, landscaping, car and cycle parking and associated works. The acceptability of the proposed MUGA, car parking and vehicle access has been confirmed through the approval of the previous scheme.

The proposal is for the replacement of the building rather than an extension to the building as previously approved. Paragraph 149 (d) of the NPPF states that the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces, is considered to be a permissible exception. As the proposed building would not be in the same use, this exception would no longer apply.

Paragraph 149 (g) of the NPPF states that the construction of new buildings should be regarded as inappropriate in the Green Belt, but that an exception to this is:

- 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.

The land that the additional footprint of the proposed building would sit on is currently occupied by a small patch of green space and trees, however it is important to note that this land is still regarded as previously developed. A 2008 aerial image of the site shows it was occupied by permanent buildings before the existing Lord Adonis House was built. It also shows that in terms of overall footprint, a greater proportion of the site was built up in 2008 than is currently the case.

A key consideration for this scheme is whether or not the proposed development can be considered to have a greater impact on the openness of the Green Belt than the existing development. In assessing the impact on openness, impact is not limited to a visual impact only, and there can be a spatial impact as well as the impact on activity generated on the site as a result of the development.

Overall, when compared to the existing development, there is a slight reduction in the height of the building, and a significant increase in the volume and footprint of the proposed building. The applicant has stated that the volume of the existing building is 7084m<sup>3</sup> compared to the proposed building at 10198m<sup>3</sup>. The total GEA of the existing building is 1914m<sup>2</sup> compared to the proposed building at 2603m<sup>2</sup>.

#### Visual Impact

Overall, there may be a slight reduction in visual impact from certain viewpoints (as indicated in the applicant's visual impact assessment) due to the slight reduction in building height of the proposed development.

In terms of visual impact, the greatest impact of the development is likely to be seen from viewpoints 6, 7 and 8 in the applicant's visual impact assessment, due to the increased footprint and volume of the building. However, locations 6 and 8 appear to be well screened by trees and hedges. The building would be unlikely to be visible from viewpoints 6 and 8 during the summer months, however, it would be important to consider the visual aspect in the autumn and winter months when trees would be more bare.

There may be more of a significant visual impact on the Green Belt from viewpoint 7 on Northwood Way, which seems to cover the main entrance to the school. The visual impact from other viewpoints around the site is likely to be unaffected.

There may be a significant impact from viewpoint 7, especially for nearby residents. This may need to be mitigated against, however the impact is still considered to be minimal when compared to the existing development. Overall, it is considered that the increased visual impact on the Green Belt could be minimal with the appropriate mitigation measures put in place.

#### Activity Generation

The applicant has stated that minimal new traffic activity will be generated as a result of the development. I would advise the case officer to refer to the Highways Officers comments to determine the likely extent of increase in activity generated to and from the site as a result of the proposed development.

#### Spatial Impact & Conclusion

There is an obvious spatial impact of the proposed development in that a greater portion of the site would be built up, with an overall significant increase in volume and GEA of the proposed building of approximately 40% when compared to the existing building. The site is fairly enclosed from all sides and screened by trees in most directions. Considering the enclosed nature of the site and the limited visual impact or impact from activity generation (subject to comments from the Highways Officer), the spatial impact of the proposed development is unlikely to be significant enough to increase overall impact on openness on the Green Belt when compared to the existing development, provided that appropriate screening and mitigation measures are maintained. The perceived effect upon the openness that might result from the increased building volume would be likely to be less than expected if the site was well screened from all sides. Beyond the view from the main entrance, there is likely to be a limited effect on people's perception of openness. There may be more of an impact from the main entrance of the Academy and Northwood Way. The view from Northwood Way and the main entrance is expected to be affected and it is considered that further information should be provided by the applicant to demonstrate how this impact will be addressed.

Subject to appropriate screening put in place to minimise visual impact, it is considered that the proposed development would meet the exception outlined in paragraph 149 (g) of the NPPF.

#### AIR QUALITY OFFICER:

##### Summary of Comments

The proposed development is located outside the LBH Air Quality Management Area (AQMA) which is approximately 3.8 km distant from the site, and outside any LBH Focus Area (FA) with the nearest one being 1891m (Northwood West Focus Area) away, with current good air quality being reported in the catchment area of the site.

The proposals are for the construction of a new permanent SEND school at the Harefield site for 90 pupils and 45 staff due to demand for pupil places at existing Meadow High School increasing and further development to accommodate this demand at the solely at the Royal Lane site cannot be facilitated.

Existing Pathway 1 pupils will relocate from the existing Meadow High School to the new proposed satellite site at Northwood Way. The remaining pupils will be new Pathway 1 staff who currently work at the existing Meadow High School will relocate to the Harefield site. Meadow High School and Harefield Academy will

be co located but operate independently from the same site.

The school will operate the same as the existing Meadow High School site. Whereby, the site will open from 06:00 and close at 18:00.

As per the London Plan and LBH Local Action Plan 2019-2024, developments need to be air quality neutral as minimum. The proposed development is considered Air Quality Neutral and is in conformity with current national, regional and local policy and legislation

#### Observations

In addition, Air Quality conditions are required to reduce operational emissions AND manage construction emissions as required by the Mayor of London. 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 address but be not restricted to:

- 1) secure compliance with the current London Plan (March 2021) and associated Planning Guidance requirements.
- 2) the implementation of a FAST electric vehicle charging bay for cars, LGVs and HGVs. This is to be implemented above the minimum number of charging points required in the London Plan.
- 3) Update the proposed Travel Plan to make it more ambitious with a clear and effective strategy to encourage staff / users of the site 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.
- 4) avoid, whenever possible, urban areas including LBH Focus Areas.

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 London Borough of Hillingdon Local Plan (part 2), the London Borough of Hillingdon Air Quality Action Plan 2019-2023, London Plan (2021) policy SI1 and T4, and paragraphs 174(e), 186 and 188 of the National Planning Policy Framework (2021).

#### Conditions - Reducing Emissions from Demolition and Construction

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

Reason: Compliance with London Plan Policy SI 1 and in accordance with Mayor of London "The Non-road mobile machinery (standard condition recommended by Mayor of London, London Local Air Quality Management Policy Guidance 2019)

B All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the

emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. 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 at <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

## Context

The proposed development is within an Air Quality Management Area and will affect identified Air Quality Focus Areas. Air Quality Focus Areas are defined by the GLA as areas already suffering from poor air quality where prioritisation of improvements is required. This is supported by:

Local Plan Part 2 Policy DME1 14

A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

B) Development proposals should, as a minimum:

- i) be at least "air quality neutral";
- ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
- iii) actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area.

## OFFICER COMMENT:

As the site is not located within an Air Quality Management Area or Air Quality Focus Area, securing a low emission strategy is not considered to be necessary. Securing a travel plan is considered to be sufficient in this context. As stated above, the proposed development is considered Air Quality Neutral and is in conformity with current national, regional and local policy and legislation.

## 7. MAIN PLANNING ISSUES

### 7.01 The principle of the development

#### PROPOSED EDUCATION FACILITY

The application proposal is inherently linked to Meadow High School, which is at capacity with 257 pupils, and the need to provide additional school SEND places. Currently, there are only three schools in Hillingdon that support children with SEND and every special school in the Borough is full, with demand increasing. The need is urgent as the pupils are already in primary schools and this needs to be reflected in an increase of secondary school provision.

Paragraph 95 of the NPPF (2023) states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take



a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education

Policy S3 of the London Plan (2021) seeks to ensure there is a sufficient supply of good quality education facilities to meet demand and offer educational choice.

At the local level, Policy CI 1 of the Hillingdon Local Plan: Part 1 (2012) supports the retention and enhancement of existing community facilities.

Policy DMCI 1 of the Hillingdon Local Plan: Part 2 (2020) states that proposals involving the loss of an existing community facility will be permitted if:

A) the specific use is no longer required on-site. In such circumstances, the applicant must provide evidence demonstrating that:

i) the proposal would not lead to a shortfall in provision for the specific use within the local catchment area;

ii) there is either no demand for another suitable social infrastructure use on-site, or that the site/premises is no longer appropriate for social infrastructure uses; and

iii) any replacement/relocated facilities for the specific use provides a level of accessibility and standard of provision at least equal to that of the existing facility.

B) the activities carried out are inconsistent and cannot be made consistent with acceptable living conditions for nearby residents; and

C) the redevelopment of the site would secure an over-riding public benefit.

The existing residential school building has been unused since July 2020 and as such is surplus to requirements in that specific use. The proposed school would be made accessible to a standard suitable for its purpose and would provide significant public benefit by providing SEND school places to meet an urgent need. The proposal is considered to comply with Policy DMCI 1.

Policy DMCI 1A of the Hillingdon Local Plan: Part 2 (2020) states that proposals for new schools and school expansions will be assessed against the following criteria:

A) The size of the site, its location and suitability to accommodate a new school or school expansion taking account of compatibility with surrounding uses, and existing planning policy designations (e.g. conservation areas, MOL, Green Belt).

B) The impact on green open space, games pitches, outdoor play and amenity space, taking account of the character of the area, whether the site is within an area of open space deficiency and whether the school has sufficient outdoor space for play and games.

C) The location and accessibility of the site in relation to:

i) the intended catchment area of the school;

ii) public transport; and

iii) the local highway network and its ability to accommodate new or additional school trips without adverse impact on highway safety and convenient walking and cycling routes to schools.

D) The extent to which the building design contributes towards the government target that schools and colleges should be zero carbon from 2016.

The proposed facilities are considered to suitably provide a new school facility on previously developed land. Although the site is located within the Green Belt, the change of use and replacement building is considered to be appropriate development. This is considered further in Section 07.05 of the report. The impact on sports provision is also considered below. Highway and accessibility matters are also considered in Section 07.10 of the report. Greenhouse gas emissions are also considered in Section 07.16 of the report.

Policy DMCI 2 of the Hillingdon Local Plan: Part 2 (2020) states:

A) Proposals for the refurbishment and re-use of existing premises for community facilities will be supported.

B) Proposals for the provision of new community facilities will be supported where they:

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

At present, SEND students are travelling to neighbouring boroughs for school as the provision within Hillingdon is at capacity. As such, the proposal would serve the residents of Hillingdon, this being considered an appropriate catchment. The school is proposed to accord with Department for Education Area Guidelines for SEND and alternative provision (BB104).

Subject to the detailed design of the proposal, it is considered that the proposed change of use accords with the requirements of Policy DMCI 2.

## SPORTS PROVISION

Paragraph 99 of the NPPF (2023) states that existing sports and recreational buildings and land 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 S5 of the London Plan (2021) states:

B) Development proposals for sports and recreation facilities should:

- 1) increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling
- 2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, universities and other community facilities
- 3) support the provision of sports lighting within reasonable hours, where there is an identified need for sports facilities, and lighting is required to increase their potential usage, unless the lighting gives rise to demonstrable harm to the local community or biodiversity.

C) Existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless:

- 1) an assessment has been undertaken which clearly shows the sports and recreational land or facilities to be surplus to requirements (for the existing or alternative sports and recreational provision) at the local and sub-regional level. Where published, a borough's assessment of need for sports and recreation facilities should inform this assessment; or
- 2) 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
- 3) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

The proposal would subdivide the existing tennis court facility at the site and replace it in part with a MUGA and outdoor play area, leaving one tennis court outside the application site.

Sport England have been consulted as part of the application process and note that the Academy has openly marketed the courts for community use and has limited usage. The facility proposed would allow those attending the school opportunities to be physically active and play several sporting activities. The information submitted indicates that boccia, short tennis, cricket, rounders and athletics would be undertaken. The space could also allow other sports, games and activities not mentioned, to be played that would engage students and encourage them to be physically active. Sport England have confirmed that they do not object to the proposals.

The proposed development is considered to provide for alternative sports and recreational provision. In combination with the SEND school places provided, the benefits of the proposal are considered to clearly outweigh the loss of the current sport use.

The specification of the proposed MUGA is unclear and as such it is advised that Sport England guidance is used to select the best surface for the sport/activities the school intends to undertake within the proposed MUGA.

Subject to planning conditions, the proposal is considered to accord with Policy S5 of the London Plan (2021) and the NPPF (2023).

#### **7.02 Density of the proposed development**

Not applicable to the consideration of this application.

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

##### **ARCHAEOLOGY**

Policy DMHB 7 of the Hillingdon Local Plan: Part 2 (2020) states that the Council, as advised by the Greater London Archaeological Advisory Service, will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving and reporting of any archaeological finds.

The Greater London Archaeological Advisory Service (GLAAS) have been consulted as part of the application process. The site does not lie in an Archaeological Priority Area and GLAAS advised that it is therefore unlikely that archaeological deposits of significance survive on the site and no further archaeological work is recommended. As such, the proposal would not be considered contrary to Policy DMHB 7 of the Hillingdon Local Plan: Part 2 (2020).

##### **CONSERVATION AREA, AREA OF SPECIAL LOCAL CHARACTER AND LISTED BUILDINGS**

Not applicable to the consideration of this application.

#### **7.04 Airport safeguarding**

Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020) states:

A) The Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. Proposals that may be a

hazard to aircraft safety will not be permitted.

B) In consultation with the Airport Operator, the Council will ensure that:

- i) areas included in Airport Public Safety zones are protected from development which may lead to an increase in people residing, working or congregating in these zones; and
- ii) sensitive uses such as housing, education and hospitals are not located in areas significantly affected by aircraft noise without acceptable mitigation measures.

The National Air Traffic Services, the Ministry of Defence and Denham Airport have been consulted and have confirmed no safeguarding objection to the proposed development. As such, the proposed development would accord with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

### **7.05 Impact on the green belt**

The application site forms part of designated Green Belt land. The following planning policies are therefore taken into consideration:

Paragraph 138 of the NPPF (2023) states that the Green Belt serves five purposes:

- 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.

Paragraph 147 of the NPPF (2023) sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'very special circumstances'. Paragraph 148 continues this, stating:

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

In terms of local policy, the Hillingdon Local Plan: Part 1 (2012) gives strong protection to Green Belt land. Policy EM2 states that the Council will seek to maintain the current extent of the Green Belt and any proposals for development in the Green Belt and Metropolitan Open Land will be assessed against national and London Plan (2021) policies, including the very special circumstances test.

Policy DMEI 4 of the Hillingdon Local Plan: Part 2 (2020) states:

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

B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

- i) the height and bulk of the existing building on the site;
- ii) the proportion of the site that is already developed;
- iii) the footprint, distribution and character of the existing buildings on the site;
- iv) the relationship of the proposal with any development on the site that is to be retained; and
- v) the visual amenity and character of the Green Belt and Metropolitan Open Land.

This above is supported by Policy G2 of the London Plan (2021).

Notably, paragraph 149 of the NPPF (2023) states that the construction of new buildings are considered to be inappropriate in the Green Belt. Exceptions to this include:

- 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; 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 150 of the NPPF (2023) also states 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 include:

- 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, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

The use of the existing outdoor sports pitches for a MUGA is permissible under 150 (e). The car parking also involves formalising and landscaping an existing area of hardstanding and would be permissible under 150 (b). The vehicular access might be considered under Paragraph 150 (b), particularly when viewed in tandem with the landscape plan.

As the proposed building would not be in the same use, paragraph 149 part (d) would not apply.

With regard to Paragraph 149 (g), the land that the additional footprint of the proposed building would sit on is currently occupied by a small patch of green space and trees, however it is important to note that this land is still regarded as previously developed. A 2008 aerial image of the site shows it was occupied by permanent buildings before the existing Lord Adonis House was built. It also shows that in terms of overall footprint, a greater proportion of the site was built up in 2008 than is currently the case.

A key consideration for this scheme is whether or not the proposed development can be considered to have a greater impact on the openness of the Green Belt than the existing development. In assessing the impact on openness, impact is not limited to a visual impact only, and there can be a spatial impact as well as the impact on activity generated on the site as a result of the development.

The proposed development has been quantified as follows:

Gross external area (GEA)

Existing: 1,914 m<sup>2</sup>

Proposed: 2,603 m<sup>2</sup>

Net difference: +689m<sup>2</sup> (+36.0%)

Volume (m<sup>3</sup>)

Existing: 6,756 m<sup>3</sup>

Proposed: 10,198 m<sup>3</sup>

Net difference: +3,442m<sup>3</sup> (+50.9%)

Height (total height in metres (m))

Existing: 12 m

Proposed: 9.3 m

Net difference: -3.3m (-22.5%)

When comparing the existing development to the proposed development, there is a slight reduction in the height of the building and a significant increase in the volume and footprint of the proposed building.

### Visual Impact

There is considered to be a slight reduction in visual impact from certain viewpoints (as indicated in the applicant's visual impact assessment) due to the slight reduction in building height of the proposed development.

In terms of visual impact, the greatest impact of the development is likely to be seen from viewpoints 6, 7 and 8 in the applicant's visual impact assessment, due to the increased footprint and volume of the building. However, locations 6 and 8 appear to be well screened by trees and hedges. The building would be unlikely to be visible from viewpoints 6 and 8 during the summer months, however, it would be important to consider the visual aspect in the autumn and winter months when trees would be more bare. There may be more of a visual impact on the Green Belt from viewpoint 7 on Northwood Way, which seems to cover the main entrance to the school. The visual impact from other viewpoints around the site are likely to be unaffected.

Overall, it is considered that the increased visual impact on the Green Belt is not significant, subject to securing appropriate mitigation measures.

### Activity Generation

The applicant has stated that minimal new traffic activity will be generated as a result of the development. The Council's Highways Officer has been consulted and is satisfied that the information submitted is robust from a traffic generation perspective. This is not considered to be an issue for the Green Belt site given that similar activity is already permitted on the application site.

### Spatial Impact & Conclusion

There is a spatial impact resulting from the proposed development due to the increased volume and footprint when compared to the existing development. The site is fairly enclosed from all sides and screened by trees in most directions. Considering the enclosed nature of the site and the limited visual impact or impact from activity generation, the spatial impact of the proposed development is unlikely to be significant enough to increase the overall impact on openness of the Green Belt when compared to the existing development, provided that appropriate screening and mitigation measures are maintained.

Subject to securing an appropriately worded planning condition to maintain and establish boundary screening through planting, the proposed development is considered to meet the exception to inappropriate development in Green Belt outlined in paragraph 149(g) of the National Planning Policy Framework. This position is notably supported by the Greater London Authority. Accordingly, the development complies with Policy EM2 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 4 of the Hillingdon Local Plan: Part 2 (2020), Policy G2 of the London Plan (2021) and Paragraphs 147 to 150 of the NPPF (2023).

### **7.07 Impact on the character & appearance of the area**

Policy BE1 of the Hillingdon Local Plan: Part 1 (2012) requires all new development to improve and maintain the quality of the built environment to create successful and sustainable neighbourhoods.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:

A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

i) harmonising with the local context by taking into account the surrounding:

- scale of development, considering the height, mass and bulk of adjacent structures;
- building plot sizes and widths, plot coverage and established street patterns;
- building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
- architectural composition and quality of detailing;
- local topography, views both from and to the site; and
- impact on neighbouring open spaces and their environment.

ii) ensuring the use of high quality building materials and finishes;

iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;

iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and

v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

The Harefield Academy site is not located within a conservation area or situated close to any other heritage assets but is located on designated Green Belt land. The main Harefield Academy building is sited to the west, is substantial in footprint and is three stories in height. By comparison, the former residential school building is much smaller in footprint and is also three stories in height. There is substantial buffer planting on the boundaries of the site, thereby screening the buildings from the street scene.

The proposal would demolish the existing building and build a new two storey purpose built school building. The elevations are considered to be sufficiently articulated with form and windows, including a main entrance on the east side which would utilise coloured cladding as a form of wayfinding. The proposed textured brick are considered to be better than the render finish of the pre-existing building.

The GLA have raised comments on the design, stating that the overall material palette does not raise strategic issues but does not successfully express the building's civic function. The main entrance is considered to lack legibility and it is noted that a more open and transparent approach for the entrance, potentially similar to the library facade, should be explored. If recommended for approval, the details of the front elevation will be secured by planning condition to allow for further exploration of an improved design.

It is noted that there are several utility structures which would add clutter to the site layout. It is recommended that these are consolidated into one structure. If recommended for approval, this would be secured by planning condition.

The development is largely screened from Northwood Road by being set back and screened by tall hedging. It would, however, be visible from Ash Grove where the building terminate the view looking north-west. Given that the proposed development would be two-storeys in height, it is not considered that the silhouette of buildings would change significantly within the skyline when comparing the pre-existing development to the proposed development.

If recommended for approval, planning conditions would secure the details of the materials to be used and the detailed design of the front elevation, roof parapet, doors and windows. Subject to such conditions, the proposal is considered to accord with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

### **7.08 Impact on neighbours**

With regard to the impact on neighbouring residents, relevant planning policies and the associated supporting text is copied below for reference.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

Paragraph 5.38 of the Hillingdon Local Plan: Part 2 (2020) states: "The Council will aim to ensure that there is sufficient privacy for residents and it will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. A minimum of 21 metres separation distance between windows of habitable rooms will be required to maintain levels of privacy and to prevent the possibility of overlooking. In some locations where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary."

Paragraph 5.40 of the Hillingdon Local Plan: Part 2 (2020) states: "For the purposes of this policy, outlook is defined as the visual amenity enjoyed by occupants when looking out of their windows or from their garden. The Council will expect new development proposals to carefully consider layout and massing in order to ensure development does not result in an increased sense of enclosure and loss of outlook."

Paragraph 5.41 of the Hillingdon Local Plan: Part 2 (2020) states: "The Council will aim to minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing caused by new development on habitable rooms, amenity space and public open space. The Council will also seek to ensure that the design of new development optimises the levels of daylight and sunlight. The Council will expect the impact of the development to be assessed following the methodology set out in the most recent version of the Building Research Establishments (BRE) "Site layout planning for daylight and sunlight: A guide to good practice".

The proposed two building extension would be sited at least 30 metres from any residential properties located along Northwood Road. The proposal is also located towards the front of these properties, as opposed to the rear which is more sensitive in terms of residential amenity. Given the separation distance notes and the limited two storey size of the proposed building, the development is not



considered to compromise the amenity of neighbouring residents in terms of outlook, privacy or daylight and sunlight. As such, the proposal is considered to accord with Policy DMHB 11, part B, of the Hillingdon Local Plan: Part 2 (2020).

#### **7.09 Living conditions for future occupiers**

Not applicable to the consideration of this application.

#### **7.10 Traffic impact, Car/cycle parking, pedestrian safety**

The site is located on Northwood Way. Based on TfL's WebCAT planning tool, the site has a PTAL rating of 1a (low). This indicates that access to public transport is moderate and that there is a dependency on the private car for trip making to and from the site.

Policy DMT 1 of the Hillingdon Local Plan: Part 2 (2020) states:

A) Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

Policy DMT 2 of the Hillingdon Local Plan: Part 2 (2020) states that proposals must ensure that safe and efficient vehicular access to the highway network is provided, schemes do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents. Also that impacts on local amenity and congestion are minimised and there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads.

Policy DMT 6 of the Hillingdon Local Plan: Part 2 (2020) requires that proposals comply with the Council's parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity. This should be viewed in conjunction with Policies T6 and T6.1 of the London Plan (2021).

Paragraph 111 of the NPPF (2023) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This is supported by Policy T4 of the London Plan (2021).

In the main, this application seeks permission to change the use of the site from a former residential school (Use Class C2) to an education facility (Use Class F.1) as part of a new build development to provide additional special needs teaching space.

#### **Car Parking**

25 no. car parking spaces, including 22 no. parking spaces for staff, one standard visitor space and two disabled parking spaces for staff and visitors. 14 existing spaces located within the main car park containing 107 spaces would also be designated to the proposed use which equates to a provision of 39 spaces. This transfer is achievable as it has been demonstrated that the main car park is generally underused.

The SEND school parking related provision approaches a 1:1 parking/staff member ratio which is considered reasonable given the very low PTAL rating and resultant dependency on private motor transport. The submitted Travel Plan is also considered to assist in ensuring that this quantum is sufficient for the staff numbers involved.

#### **Disabled Compliant Parking**

Policy T6.5, Table 10.6, of the London Plan (2021) states that disabled car parking should be provided for the proposed use as follows:

- Designated bays equal to 5% of the total car parking provision
- Enlarged bays equal to 5% of the total car parking provision

The plans submitted show that two disabled car parking spaces would be provided within the new car park. In order to be policy compliant, 2 no. designated bays and 2 no. enlarged bays are required. If recommended for approval, this provision would be secured by condition. Subject to condition, the proposal accords with Policy T6 of the London Plan (2021).

#### Electric Vehicle Charging Infrastructure

The Hillingdon Local Plan: Part 2 (2020) states that parking for electric vehicles should be provided at a current minimum of 5% of car parking spaces with 5% passive provision, equating to 2 no. car parking space with an active electric vehicle charging point and 2 no. parking space with passive electric vehicle charging infrastructure. If recommended for approval, this would be secured by planning condition.

#### Motorcycle Parking

Policy DMT 6, Appendix C, of the Hillingdon Local Plan: Part 2 (2020) states that parking spaces for motorised two wheelers (motorcycles, moped and scooters) must be provided at the rate of 5% of car parking spaces.

If recommended for approval, a condition would secure the provision of 2 no. motorcycle parking spaces.

#### Cycle Parking

Policy T5, Table 10.2, of the London Plan (2021) states that 1 long-stay cycle parking space should be provided per 8 full time staff plus 1 space per 8 students and 1 no. short stay cycle space per 100 students.

On the basis that there will be 45 staff and 90 students, the development should provide 17 long stay and 1 short stay cycle spaces. A total of 14 standard sheffield stands and four enlarged cycle parking bays are proposed, totalling 18 spaces. This is considered to be acceptable.

#### MUGA and Outdoor Sports Area

The proposed sports facilities would not be available to the community and as such the impacts in terms of vehicle movements would be negligible.

#### Trip Generation

Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) requires the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

In terms of the existing use, it is understood that most of the 90 pupils arrive by mini-bus. Drop-off

and pick-up is used less so, totalling 37 vehicular trips during the morning and afternoon periods. 35 out of the 45 staff drive to and from the school.

A total of 118 two-way vehicular movements generated by the Academy and SEND components (including servicing/delivery/waste collection) are anticipated to occur at the new access arrangement on Northwood Road spread throughout each peak morning and afternoon period. This uplift is considered relatively manageable and would not be considered prejudicial to highway capacity or general safety subject to implementation of certain mitigation.

#### Parking Design and Management Plan

A Parking Design and Management Plan is a key tool which helps to ensure an unhindered and functional operation for all parking spaces and drop-off/pick-up with the site. This involves creating an internal site management regime that would enforce and oversee overall parking/operational control on a site wide basis thus ensuring the harmonious and mutual coexistence of parking bay allocations between the two school uses. If recommended for approval, this would be secured by planning condition.

#### Internal Layout and New Access, Drop-off and Pick-Strategy

A new two-way access is proposed on Northwood Road to formalise what was a temporary construction access. Currently, it is proposed that vehicles access the site via Northwood Way, drop-off next to the proposed school building and exit via Northwood Road. This would need to be secured via a S278 highways agreement, forming part of a Section 106 legal agreement.

Existing Academy related activities would continue with most drop-offs and pick-ups occurring within the site envelope as before. This allows for any queuing of vehicles to occur within rather than outside of the school envelope which is beneficial to the local highway network. The applicant has also demonstrated that vehicles ranging from a 'transit' mini-bus to refuse/larger delivery vehicles, can enter and leave the site unencumbered in a forward gear. Impacts on the local network are therefore not envisaged to be detrimental.

#### Active Travel Zone Assessment

The Active Travel Zone Assessment states that the surrounding public realm exhibits a reasonably high degree of accessibility to key destinations with only very minor issues identified along the said routes. No enhancements are recommended or proposed.

As the proposed SEND school attendance will be predominantly vehicle bound, any notable footfall burden on the local footways, formal road crossings and public transport provisions (in addition to that already imposed by the existing Academy) is not anticipated. This is accepted.

#### Servicing and Delivery

If recommended for approval, a finalised Servicing and Delivery Plan would be secured by condition.

#### Travel Plan

A school Travel Plan is a key tool in moving toward sustainable travel and mitigating impacts on the local highway network. If recommended for approval, a final detailed Travel Plan would be secured by

a Section 106 legal agreement.

#### Construction Logistics Plan

If recommended for approval, a finalised Construction Logistics Plan would be secured by condition.

#### Summary

Subject to conditions and a Section 106 legal agreement, the proposed development would not be considered to prejudice conditions on the local highways network, in accordance with Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Hillingdon Local Plan: Part 2 (2020) and Policies T4 and T7 of the London Plan (2021).

### 7.11 Urban design, access and security

#### URBAN DESIGN

During the consultation process, comments have been received from the GLA and the Council's Urban Design Officer with respect to the location of the entrance. The entrance has been proposed on the eastern side of the building and is next to where pupils will be dropped-off on their arrival to the school. For the users of the site, this being school children and staff, the location of the entrance is considered to be appropriate and is accepted.

Comments have also been received regarding the layout of the site and potential to amalgamate the two car parks, with the intention of using the land more efficiently. Whilst the intent of these comments is appreciated, it is not considered that the layout as proposed would result in any harm and as such would not form a robust reason for refusal.

Please see Section 07.07 of the report for consideration of the designs impact on the character and appearance of the area.

#### ACCESS

Please see Section 07.12 of the report.

#### SECURITY

Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. Where relevant, these should be included in the Design and Access Statement. Development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures:

- i) providing entrances in visible, safe and accessible locations;
- ii) maximising natural surveillance;
- iii) ensuring adequate defensible space is provided;
- iv) providing clear delineations between public and private spaces; and
- v) providing appropriate lighting and CCTV.

This is supported by Policy D11 of the London Plan (2021).

If recommended for approval, a secure by design condition would be attached to achieve appropriate accreditation. Subject to such a condition, the proposal would accord with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) and Policy D11 of the London Plan (2021).

### **7.12 Disabled access**

Policy D5 of the London Plan (2021) states that development should achieve the highest standards of accessible and inclusive design. Specifically, it should be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment.

The Council's Access Officer raised comments with respect to the provision of changing places for disabled children, an evacuation lift, and an emergency evacuation plan and fire strategy. An amended Fire Statement was submitted alongside drawing reference 'TVC0024-NOV-V1-XX-DR-A-PL20 Rev. P01 WC Provision & Strategy Layout'. These documents detail the provision of changing places, evacuation lift and evacuation strategy. The Council's Access Officer has confirmed that the details submitted are considered to be sufficient and acceptable. Accordingly, the proposal is considered to be acceptable from an accessibility perspective and complies with Policy D5 of the London Plan (2021).

### **7.13 Provision of affordable & special needs housing**

Not applicable to the consideration of this application.

### **7.14 Trees, landscaping and Ecology**

#### **TREES AND LANDSCAPING**

Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020) require that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should enhance amenity, biodiversity and green infrastructure. Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

The proposals will require the removal of 8 trees, 6 of which would be category B and 2 of which would be category C. Significantly, a total of 51 no. new trees will be planted within the site post-construction. Some basic tree protection measures and working methodology (in accordance with BS 5837:2012) will ensure the retained trees are not detrimentally affected during construction. A green roof is also proposed and significantly adds to the greening of the site. Subject to a compliance condition ensuring that trees are protected, the proposal accords with Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020).

#### **URBAN GREENING FACTOR**

Policy G5 of the London Plan (2021) states:

- a. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- b. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of

0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.

The Urban Greening Factor target score does not technically apply to school development but it is noted that the proposal does include significant planting and that the development would achieve a score of 0.44. As such the principles of this policy are considered to have been adopted as part of the proposed development.

## ECOLOGY

Paragraph 174 of the NPPF (2023) states that planning decisions should contribute to and enhance the natural and local environment by: 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. This is supported by Policy G6 of the London Plan (2021) and Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020).

The site is located within 50m of Shepherds Hill House Site of Importance for Nature Conservation (SINC), identified as being of Borough Importance. In accordance with Policy G6, the applicant should avoid impacts to the SINC and set out in the application how they will avoid direct or indirect impacts on the SINC. Given the nature and scale of the proposals, it is not considered likely that there will be any significant impacts to the SINC. Construction of the development should avoid and mitigate any potential impacts. If recommended for approval, this would be secured by planning condition.

The application site itself presents limited ecology value and the proposal would have a negligible to low level of ecological impact. If recommended for approval, the full details of an ecological enhancement plan (including long term management measures) would be secured by planning condition. Subject to such a condition, the proposed development would accord with Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020), Policy G6 of the London Plan (2021) and Paragraph 174 of the NPPF (2023).

### **7.15 Sustainable waste management**

#### OPERATIONAL WASTE MANAGEMENT

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

The proposed bin store for the school is located to the north of the secure minibus drop-off area within the school play area. This would be accessible for refuse collection requirements. The details of this area shall be secured by planning condition if recommended for approval. As such, the proposal is considered to accord with Policy DMHB 11, Part D, of the Hillingdon Local Plan: Part 2 (2020).

#### CIRCULAR ECONOMY

Policy EM11 of the Local Plan: Part 1 (2012) requires all new development to address waste management at all stages of a development's life from design and construction through to the end

use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy.

Policy SI 7, Part B, of the London Plan (2021) states that referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:

- 1) how all materials arising from demolition and remediation works will be re-used and/or recycled
- 2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
- 3) opportunities for managing as much waste as possible on site
- 4) adequate and easily accessible storage space and collection systems to support recycling and re-use
- 5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
- 6) how performance will be monitored and reported.

A Circular Economy Statement has been submitted. This is likely to be subject to amendment during the GLA Stage 2 referral process. If recommended for approval, a post-construction circular economy monitoring report would be secured by planning condition. Subject to such a condition, the proposed development would accord with Policy SI 7 of the London Plan (2021).

## **7.16 Renewable energy / Sustainability**

### **GREENHOUSE GAS EMISSIONS**

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 (2020) requires that:

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

This is supported by Policy EM1 of the Hillingdon Local Plan: Part 1 (2012).

Policy SI 2 of the London Plan (2021) states that major development should be net zero-carbon, in accordance with the energy hierarchy: Be lean: use less energy and manage demand during operation; Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly; Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site; and Be seen: monitor, verify and report on energy performance.

The submitted Energy Strategy states that the development achieves a reduction of 16.9 tonnes of CO<sub>2</sub> per year by using air source heat pumps and PV panels, equal to a 117% improvement over the baseline. Based on consultation comments received from the GLA, it is understood that this has not been calculated correctly. Monitoring of this will be secured by planning condition and a Section 106 legal obligation will ensure that any failure to achieve the savings is mitigated through the payment of a cash in lieu contribution. Subject to the condition and Section 106 planning obligation, the proposed development would not be considered contrary to Policy SI 2 of the London Plan (2021), Policy EM1

of the Hillingdon Local Plan: Part 1 (2012) and Policy DMEI 2 of the Hillingdon Local Plan: Part 2 (2020).

## WHOLE LIFE-CYCLE CARBON

Policy SI 2, Part F, of the London Plan (2021) states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

The applicant has submitted a Whole Life-Cycle Carbon (WLC) assessment. This is likely to be subject to amendment during the GLA Stage 2 referral process. If recommended for approval, a condition would secure the submission of a post-construction assessment to report on the development's actual WLC emissions. Subject to such a condition, the proposal would accord with Policy SI 2, Part F, of the London Plan (2021).

## ENERGY INFRASTRUCTURE

Policy SI 3 of the London Plan (2021) states that major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system:

- 1) the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:
  - a) connect to local existing or planned heat networks
  - b) use zero-emission or local secondary heat sources (in conjunction with heat pump, if required)
  - c) use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network)
  - d) use ultra-low NOx gas boilers
- 2) CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that they meet the requirements in Part B of Policy SI 1 Improving air quality
- 3) where a heat network is planned but not yet in existence the development should be designed to allow for the cost-effective connection at a later date.

If recommended for approval, a planning condition would secure a connection to a district heating network should one become available in the future. Subject to such a condition, the proposed development would accord with Policy SI 3 of the London Plan (2021).

## OVERHEATING

Policy SI 4 of the London Plan (2021) states:

- A) Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- B) Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:
  - 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
  - 2) minimise internal heat generation through energy efficient design;
  - 3) manage the heat within the building through exposed internal thermal mass and high ceilings;
  - 4) provide passive ventilation;
  - 5) provide mechanical ventilation; and



6) provide active cooling systems.

If recommended for approval, the detail of an Overheating Strategy shall be secured by condition. Subject to condition, the proposal would accord with Policy SI 4 of the London Plan (2021).

### 7.17 Flooding or Drainage Issues

Policy SI 12 of the London Plan (2021) requires that development proposals ensure that flood risk is minimised and mitigated. Policy SI 13 of the London Plan (2021) also requires that development proposals utilise sustainable urban drainage systems (SuDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. This is supported by Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020). Notably, proposals that fail to make appropriate provision of flood risk and surface water flooding mitigation will be refused.

The application site is located within Flood Zone 1 and does not form part of a Critical Drainage Area. The application site forms part of an already operational school with areas of hardstanding. The proposal would introduce new landscaped areas with attenuation properties, such as landscaped areas and living roofs. The use of the tank system for further attenuation is less sustainable but will provide betterment. If recommended for approval, a condition requiring final details of the drainage strategy will be secured alongside verification and evidence of 'as built' systems. Subject to such conditions, the proposal would not be considered contrary to Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020) and Policies SI 12 and SI 13 of the London Plan (2021).

### WATER INFRASTRUCTURE

Policy SI 5 of the London Plan (2021) states:

C) Development proposals should:

- 2) achieve at least the BREEAM excellent standard for the 'Wat 01' water category 160 or equivalent (commercial development)
- 3) incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing.

E) Development proposals should:

- 1) seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided
- 2) take action to minimise the potential for misconnections between foul and surface water networks.

During the consultation process, Thames Water have confirmed no objection to the proposed development in respect of waste water network and sewage treatment works. However, insufficient information has been submitted in respect of the BREEAM standards for Wat 01 credits and water metering and saving measures.

However, the test is to determine whether this lack of information needs to be resolved prior to determination or post approval via way of condition. The information requested is not of a unique nature and the information provided shows general compliance with policy at this stage of the process. Whilst it is accepted further information is necessary there is nothing to suggest that this would not be forthcoming. Securing the information by way of condition would satisfy the requirements of the planning policy.

Subject to the necessary planning conditions, the proposed development would accord with Policy SI 5 of the London Plan (2021).

## 7.18 Noise or Air Quality Issues

### NOISE

The relevant planning policy considerations are outlined below for reference.

Policy D14 of the London Plan (2021) states:

- A) In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:
- 1) avoiding significant adverse noise impacts on health and quality of life
  - 2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
  - 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
  - 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
  - 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials - in preference to sole reliance on sound insulation
  - 6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
  - 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

The Noise Impact Assessment has been considered by the Council's Noise Specialist. It is concluded that the impact of traffic on the users of the site is unlikely to be significant. Compliance with the Building Bulletin 93 Acoustic design of schools: performance standards (BB93) requirements can be met by ensuring appropriate specification of building envelope, glazing and ventilation strategy. Subject to a condition which secures a limit on noise rating levels for plant and machinery, the information submitted is considered acceptable with regard to noise and vibration matters, in accordance with Policy D14 of the London Plan (2021) and Policy EM8 of the Hillingdon Local Plan: Part 2 (2020).

### AIR QUALITY

Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will seek to safeguard and improve all land, water, air and noise quality. All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. Policy SI 1 of the London Plan (2021) further supports this.

Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) states:

- A) Development proposals should demonstrate appropriate reductions in emissions to sustain

compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

B) Development proposals should, as a minimum:

- i) be at least "air quality neutral";
- ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
- iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

The proposed development is located outside the Hillingdon Air Quality Management Area and Air Quality Focus Area, with good air quality being reported in the catchment area of the site. The proposed development is considered to be Air Quality Neutral and is in conformity with current national, regional and local policy. Subject to conditions ensuring best practice with regard to emissions during construction, the proposal would be considered to accord with Policy SI 1 of the London Plan (2021), Policy EM8 of the Hillingdon Local Plan: Part 2 (2020), and Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020).

### **7.19 Comments on Public Consultations**

Please see Section 06.1 of the report.

### **7.20 Planning obligations**

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 (2020) states:

A) To ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL).

B) Planning obligations will be sought on a scheme-by-scheme basis:

- i) to secure the provision of affordable housing in relation to residential development schemes;
- ii) where a development has infrastructure needs that are not addressed through CIL; and
- iii) to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

C) Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.

The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:

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

The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested that do not meet the policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.

On the basis of the NPPF and the Community Infrastructure Levy Regulation 2010, it is only

considered reasonable to request the following planning obligations:

i) Carbon Offset Contribution: Any additional shortfall identified through the ongoing reporting required by Condition 22 shall form a cash in lieu contribution in accordance with Policy SI2 of the London Plan at a rate of £95/tCO<sub>2</sub> annualised for not more than 30 years beginning on the commencement of development.

ii) Travel Plan: A full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include such matters as: targets for sustainable travel arrangements; effective measures for the ongoing monitoring of the Travel Plan; and a commitment to delivering the Travel Plan objectives.

iii) Highways Works: Section 278 agreement to secure highway works, including construction of new access on Northwood Road.

iv) Employment Strategy and Construction Training: either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is the Council's priority. A financial contribution will only be accepted in exceptional circumstances.

v) Project Management & Monitoring Fee: A financial contribution equal to 5% of the total cash contributions.

#### COMMUNITY INFRASTRUCTURE LEVY (CIL):

The scheme would also be liable for payments under the Community Infrastructure Levy.

Please be advised that as from 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100m<sup>2</sup> or more will be liable for the Mayoral Community Infrastructure Levy (Mayoral CIL), as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will be equal to £60 per square metre (from April 2019). The London Borough of Hillingdon is a collecting authority for the Mayor of London and this liability shall be paid to LBH in the first instance.

In addition the development represents Chargeable Development under the Hillingdon Community Infrastructure Levy, which came into effect on 1st August 2014. The liability payable is equal to £0 for the proposed school use.

#### **7.21 Expediency of enforcement action**

Not applicable to the consideration of this application.

#### **7.22 Other Issues**

##### DIGITAL CONNECTIVITY

Policy SI 6 of the London Plan (2021) states:

- A) To ensure London's global competitiveness now and in the future, development proposals should:
- 1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end

users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users

- 2) meet expected demand for mobile connectivity generated by the development
- 3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation
- 4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.

If recommended for approval, a planning condition would ensure that sufficient ducting space for full fibre connectivity infrastructure is provided within the development. Subject to such a condition, the proposed development would accord with Policy SI 6 of the London Plan (2021).

## CONTAMINATED LAND

Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (2020) states that:

A) Proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.

B) Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

C) Where initial studies reveal potentially harmful levels of contamination, either to human health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.

D) In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected land, a S106 planning obligation will be sought.

The Council's Contamination Officer considers that the proposal is acceptable subject to a planning condition requiring that imported materials are free from contamination. Subject to such a condition, the proposal is not considered contrary to Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

## FIRE SAFETY

Policy D12 of the London Plan (2021) states that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The statement should detail how the development proposal will function in terms of:

- 1) the building's construction: methods, products and materials used, including manufacturers' details
- 2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- 3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- 4) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- 5) how provision will be made within the curtilage of the site to enable fire appliances to gain access

to the building

6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

The London Fire Brigade have been consulted and have provided advice on the internal layout which includes dead-end corridors which are not supported. If recommended for approval, a final Fire Statement would be secured by condition. The discharge of condition application should be accompanied by a Building Control application. Subject to such a condition, the proposal would accord with Policy D12 of the London Plan (2021).

## **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**

In conclusion, the proposed school is supported in principle. Following an assessment of the development, the proposal is also considered to be appropriate development within the Green Belt, without detriment to the street scene and sensitive to neighbour amenity. The development is also considered acceptable with regard to its impact on the local highway network and air quality. Planning obligations are also proposed to be secured by a Section 106 legal agreement, including obligations for net-zero carbon, a travel plan and Section 278 agreement for the new vehicular access.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The proposal is considered to be acceptable and is recommended for approval, subject to a Section 106 legal agreement and planning conditions.

#### **11. Reference Documents**

National Planning Policy Framework (September 2023)

The London Plan (March 2021)

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

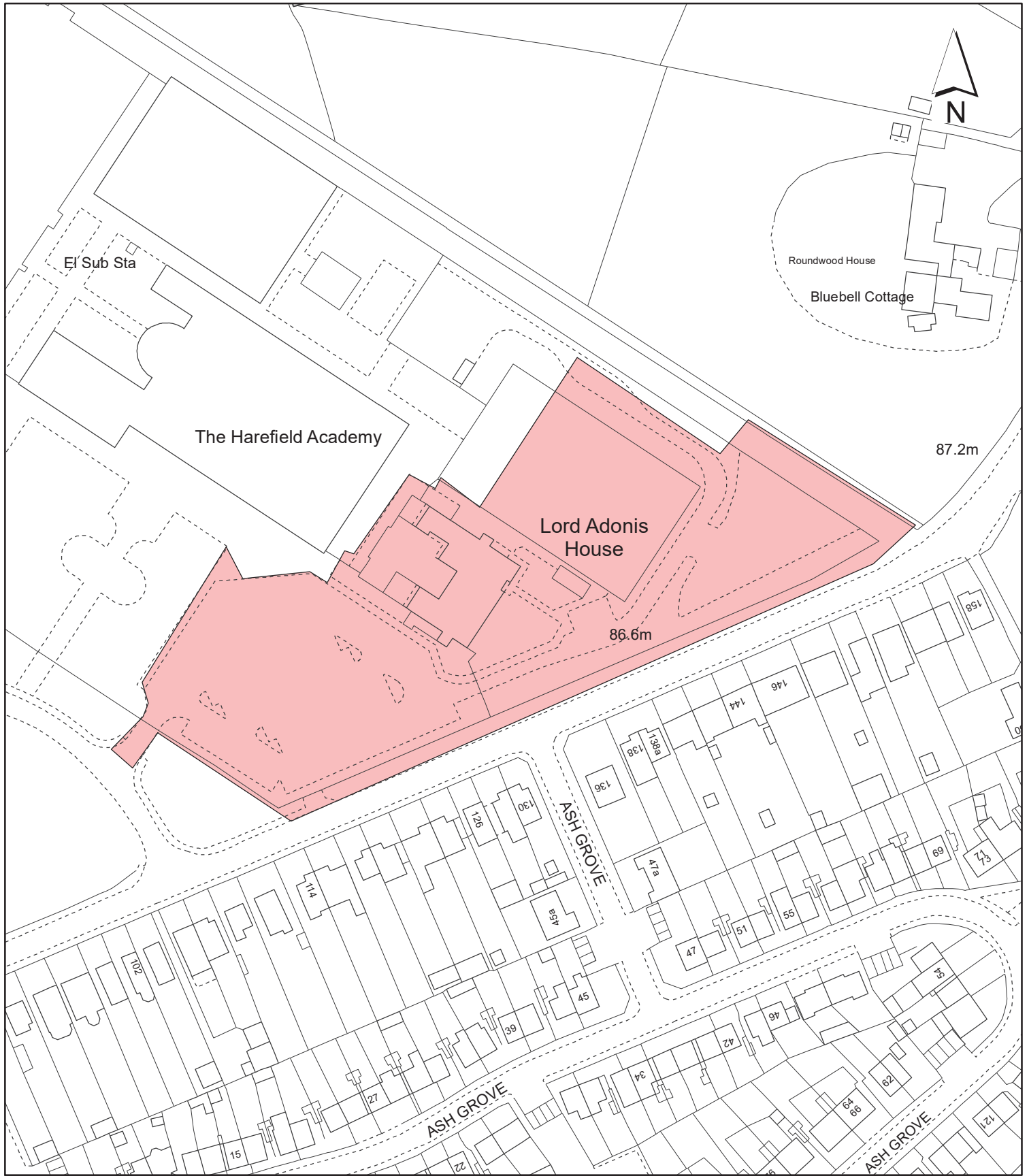
Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)

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

Accessible Hillingdon Supplementary Planning Document (September 2017)

Planning Obligations Supplementary Planning Document (July 2014)

**Contact Officer:** Michael Briginshaw      **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:

**Lord Adonis House  
 Harefield Academy  
 Northwood Way**

**LONDON BOROUGH  
 OF HILLINGDON**  
 Residents Services  
 Planning Section

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

Planning Application Ref:

**17709/APP/2023/2673**

Scale:

**1:1,500**

Planning Committee:

**Major**

Date:

**December 2023**



**HILLINGDON**  
 LONDON