



GL Hearn

Part of Capita Real Estate

Planning Statement

QED Academy Trust Limited

Queensmead School
Queens Walk
Ruislip
HA4 0LS

March 2020
v1

Prepared by

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Contents

Section	Page
1 INTRODUCTION	4
2 BACKGROUND	6
3 SITE AND SURROUNDING AREA	8
4 RELEVANT PLANNING HISTORY	11
5 THE PROPOSAL	12
6 STATEMENT OF COMMUNITY INVOLVEMENT	16
7 PLANNING POLICY CONTEXT	17
8 CONCLUSION	43

Quality Standards Control

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This document must only be treated as a draft unless it has been signed by the Originators and approved by a Business or Associate Director.

March 2020

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Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

1 INTRODUCTION

- 1.1 This Planning Statement has been prepared by GL Hearn in support of a full planning application on behalf of QED Academy Trust Limited (hereafter referred to as the 'the Applicant') in respect of the redevelopment of Block B at Queensmead School, Queens Walk, Ruislip, HA4 0LS (hereafter referred to as 'the site').
- 1.2 The proposed development seeks the demolition of the existing Block B (including water tower) at Queensmead School and the erection of a new two storey school building on the site of the existing Block B.
- 1.3 The application forms Phase 2 of the wider Queensmead School redevelopment. The planning applications for Phase 1 of the proposed development, which comprises the enabling works which includes the erection of on-site temporary classrooms and a new stand-alone plant room is currently being determined by the London Borough of Hillingdon.
- 1.4 The proposed description of development is:

'Full planning application for the demolition of the existing Block B (including basement plant room, adjacent canopies and water tower) and the erection of a new 1974sqm two storey school building including associated external ramps and two free standing canopies'

- 1.5 The purpose of this Statement is to describe the key characteristics of the application site, surrounding area and the proposed development. It will assess the principle issues arising from the proposal in light of the relevant planning policy context and material considerations. This Statement is structured as follows:
- Section 2 – sets out the background to the development;
 - Section 3 – describes the site characteristics and the surrounding area;
 - Section 4 – identifies the planning history relevant to the site and its proposed redevelopment;
 - Section 5 – describes the details of the proposals;
 - Section 6 – describes the pre application consultation which has been undertaken in relation to the proposal;
 - Section 7 – considers the application proposals in the context of relevant adopted planning policy and material considerations; and
 - Section 8 — summarises the impact and benefits resulting from the application proposal.
- 1.6 The submission meets the requirements agreed with officers at London Borough of Hillingdon Council ('the Council') and comprises the following suite of documents:

1.7 A full document and drawing list has also been submitted in support of this application.

Information Required for a Valid Application	By:
Application Form, Fee, Certificates, Notices, CIL Form	GLH
Location Plan	Lungfish
Proposed Location Plan	Lungfish
Existing and Proposed Site Plan	Lungfish
Existing and Proposed Floorplans	Lungfish
Existing and Proposed Elevations	Lungfish
Existing and Proposed Roof Plans	Lungfish
Existing and Proposed Sections	Lungfish
Proposed Canopies	Lungfish
Design and Access Statement	Lungfish
Tree Survey/ Arboricultural Impact Assessment	Arbtech
Heritage Statement	MOLA
Contaminated Land Survey	Ridge
Drainage Assessment and Plans (including SUDs details)	DWS
Energy Statement	BEC
External Lighting Details	BEC
Flood Risk Assessment	MTC
Landscaping Strategy	Lungfish
Levels Survey Information	Morgan Sindall
Materials Details	Lungfish
Noise and Vibration Impact Assessment	Stroma
Refuse and Servicing Management Plan	Morgan Sindall
Technical Detail (including brochure) of proposed plant and ventilation equipment	Remha/ Breathing Buildings/ Nuaire
Construction Environmental Management Plan	Morgan Sindall
Ecology Survey	Arbtech
Planning Statement	GLH

2 BACKGROUND

Queensmead School

- 2.1 Located within Ruislip, Queensmead School is a non-selective existing 8 form entry (8FE) mixed sex secondary school for 11-18-year olds, encompassing both secondary school and sixth form. It is part of the QED Academy Trust.
- 2.2 The school has 1435 pupils; which includes secondary school pupils (11-16-year olds) and sixth form pupils (16-18-year olds) and 147.65 FTE members of staff. There is no pupil or staff expansion planned as part of the proposals.
- 2.3 Queensmead School is a forward-looking dynamic academy which has a tradition of combining high expectations for all their students and a curriculum that is appropriate to the needs of the 21st Century. The School is committed to providing equal access to a wide range of educational and cultural experiences and creating an environment in which all students are able to discover and develop their full potential. Fundamentally they are an ambitious school that is committed to seeking the best for all students
- 2.4 Queensmead School has four key values which represent both their commitment to academic excellence as well as their determination to maintain a car community for everyone. These are as follows: kindness, respect, resilience and independence.

Queensmead School Redevelopment

- 2.5 The school site at Queensmead is to undergo redevelopment. Construction is phased in order to allow minimal disturbance to the school. Phase 1 relates to the enabling works which comprises the erection of on-site temporary classrooms (ref: 12933/APP/2020/414) and a permanent stand-a-lone plant room positioned to the west of the existing Block B (ref: 12933/APP/2020/363). These planning applications for these works have been submitted and are currently undergoing determination by the London Borough of Hillingdon. These enabling works will be completed in advance of the proposed Phase 2 main works planning application to ensure there no loss of teaching or plant provision.
- 2.6 This planning application details Phase 2 of the proposed development which comprises the main works and includes the erection of a new two storey school building positioned on the site of the existing Block B. As part of the works, the existing Block B and water tower will be demolished.

3 SITE AND SURROUNDING AREA

- 3.1 The following section describes the key characteristics of the application site and surrounding area. For further details please refer to the accompanying Design and Access Statement prepared by Lungfish Architects.

The Site

- 3.2 The site is located within Ruislip, under the jurisdiction of London Borough of Hillingdon. The application site currently comprises the existing Block B (Design and Technology Block), boiler flue chimney and adjacent concrete water tower at Queensmead School.
- 3.3 The existing Block B comprises a single storey linear shaped building, with a basement plant room, located within the centre of the existing school site. The building is characterised by five linked post war prefabricated buildings of uniform design. Each building is rectangular in shape linked by a narrow single-storey corridor and characterised by barrel vaulted roof forms, Crittalltype windows and blue panelled sections below the fenestration adding colour to the building. Each building can be accessed via concrete steps from the courtyard or internally via other classrooms.
- 3.4 The existing Block B is in very poor condition and considered to be life expired and beyond refurbishment. The existing building comprises the following accommodation: product design, resistant materials, engineering room, CAD/CAM suite, metal workshop, SEN Room, SEN Office, inclusion rooms, staff office, WC's and stores at first floor level and a boiler room, electrical intake and stores at basement level
- 3.5 Located off Queens Walk in Ruislip, the application site itself covers an area of approximately 0.53 hectares.



Figure 1: Site Location

- 3.6 The wider 9.2ha Queensmead School site currently comprises numerous existing school buildings, which comprise predominantly single storey and two-storey blocks located towards the east of the site. The site also includes a number of sporting facilities including Queensmead Sports Centre, Goals Soccer Centre and tennis courts located towards the south of the site and playing fields located towards the north of the site.
- 3.7 Vehicular and pedestrian access to the school site is gained via Queens Walk. There are a number of car parking spaces located within the application site. The wider school site currently has 173 no. car parking spaces at the rear of the school, with a further 23 no. car parking spaces at the front of the school site. In terms of cycle parking, there are currently 46 no. stanchions on site providing space for 92 no. cycles.
- 3.8 The application site is bounded to the north by existing school buildings including Block E and Block F; to the east by an existing courtyard and Block M; south by an existing staff car park; and west by Block D and Goals Sport Complex. The wider surrounding area is characterised by educational uses (D1), within the Queensmead School campus.
- 3.9 The application site is not allocated within the adopted London Borough of Hillingdon Local Plan Part 2 Policies Map (2019). A Nature Conservation Site of Borough Grade II or Local Importance lies 170m to the south of the school site. A Strategic Industrial Location lies 90m south east of the school site. The application site is located within Flood Zone 2; therefore, land and property have a low probability of flooding. The entire school site also falls within a Critical Drainage Area.
- 3.10 No part of the site lies within the Green Belt or within a Conservation Area and there are no statutory listed buildings on the development site. However, Block B is Locally Listed and forms part of a group of buildings designed by Yorke, Rosenberg and Mardall Architects in 1953. There are no trees located on the application site, however there are a number of trees located on the wider school site which are covered by a Tree Preservation Order (ref: TPO 193).

The Surrounding Area

- 3.11 The wider school site is bounded to the north by residential properties off Long Drive and Deansfield Primary School; east by residential properties off Queens Walk; and south and east by commercial properties off Victoria Road.
- 3.12 Surrounding schools and nurseries in the area include Deansfield Primary School which adjoins the north of the site, Northolt High School which is 930m south east of the site; Willow Tree Primary School which is 930m south east of the site; Bourne Primary School which is 685m south west of the site; and Saint Swithun Wells Primary School which is 686m north of the site.

- 3.13 The site is located approximately 550m east of South Ruislip, which operates on the Chiltern Railways Line. The school is served by a number of bus routes, with services to Ruislip and Mill Hill. The nearest bus stop adjoins the site located on Victoria Road. There are also a number of bus stops within the surrounding area. The site is well connected by Road; being approximately 1km from the A40.
- 3.14 The wider school site is located within an area considered to have Public Transport Accessibility Level (PTAL) of part 1b, 2, and 3; which is considered very poor, poor and moderate (respectively) in PTAL grading.

4 RELEVANT PLANNING HISTORY

- 4.1 The planning applications listed are based on an online planning search conducted via the Council's online planning tool.

Queensmead School Site History

- 4.2 **12933/APP/2020/414-** Full planning application for the demolition of the existing temporary school classrooms and the erection of a new 339sqm two storey temporary school classroom building- Under Consideration.
- 4.3 **12933/APP/2020/363-** Erection of a new 49sqm standalone plant room at Queensmead School- Under Consideration.
- 4.4 **12933/APP/2009/1195-** Erection of single-storey detached building for use as Class D2 (Assembly and Leisure)- Approved 31/12/2009.
- 4.5 **12933/APP/2008/176-** Erection of a modular building to provide replacement science facilities and administration accommodation (involving demolition of existing science building and garage block)- Approved 11/03/2008.
- 4.6 **12933/APP/2007/2481-** Erection of a modular building to provide replacement science facilities and administration accommodation (involving demolition of existing science building and garage block)- Refused 20/12/2007
- 4.7 **12933/APP/2007/2496-** Erection of a single storey pre-fabricated storage unit (involving demolition of an existing detached garage at the northeast corner of the school compound)- Approved 04/10/2007.

5 THE PROPOSAL

5.1 The following section sets out the details of the proposed development at Queensmead School, Ruislip. For further information, please refer to the Design and Access Statement prepared by Lungfish Architects.

5.2 The proposed description of development is:

‘Full planning application for the demolition of the existing Block B (including basement plant room, adjacent canopies and water tower) and the erection of a new 1974sqm two storey school building including associated external ramps and two free standing canopies’

5.3 Queensmead School is a previously established secondary school funded by QED Academy Trust Limited. All existing buildings on site are considered to be of D1 use. Since the proposal seeks to construct a new classroom building on the footprint of the current block, a change of use if not required and the principal of development is considered acceptable.

5.4 The proposed works will not lead to an increase in student in take or staff employment. The school currently has a total of 1435 pupils aged between 11 and 18 years old and 147.65 FTE members of staff.

5.5 This application seeks permission for the demolition of the existing Block B (including basement plant room, adjacent canopies and water tower) and the construction of a new two-storey school building positioned on the footprint of the existing Block B.

5.6 To facilitate the main works, two applications for the enabling works (Phase 1) have been submitted and are currently being determined by the Local Planning Authority. Phase 1 seeks to facilitate the demolition of the existing temporary school building and the erection of a new temporary classroom and new permanent standalone plant room. On completion of the main works, the temporary classrooms (subject to a separate planning application) will be removed and the land will be reinstated to hard standing.

Amount

5.7 The existing one storey building (Block B) will be demolished (a total of 962sqm GIFA). The new two storey school building will cover an increased footprint of 1974sqm GIFA split over two floors. Please see figure 2 below for a full breakdown of the existing and proposed floorspace figures.

	Breakdown	Total (sqm)
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Existing GIFA	Block B	962
GIFA to be demolished	Block B	962
Proposed new build GIFA	Proposed School Building	1974
Proposed new build GEFA	Proposed School Building	2051

Figure 2: **Existing and Proposed Floor Areas (SQM)**

- 5.8 The new school building has been designed in a linear shape and suitably located at the centre of the school to be suitably located for the existing service routes and close proximity to the existing buildings and access around the site. The new building will not significantly impact neighbouring buildings and so there will be minimal impact on the wider school site.
- 5.9 The new school building will accommodate a total of 18 no. teaching classrooms including a new design and technology block at ground floor level and new general teaching classrooms at first floor level. The existing SEND accommodation is proposed to be re-located elsewhere on site.
- 5.10 The reconfiguration of the school building will allow for a more efficient use of the existing site, intensifying the use of the site, to an appropriate density. The main pedestrian and vehicle access via Queens Walk will be retained, however new ramps and footpath will be provided surrounding the new school building.
- 5.11 The existing Block B is in very poor condition and considered to be life expired and beyond refurbishment. Working with the DfE and the School, the new school block utilises Building Bulletin (BB103): Area Guidelines for Mainstream Schools which sets out simple area guidelines for school buildings and sites for age ranges from 3 to 19. The newly proposed floorspace is in line with the recommended government floor areas for secondary school students. Internally the building layout has been thoroughly considered to create a simple and legible layout.
- 5.12 Opening hours will remain the same as existing following the proposed redevelopment. The timings of the school day are as follows

Event	Time
Gates Open	07:45

Before School Club	07:45- 08:25
School Day	08:25-14:45
After School Club	15:00-16:00
Gates Close	16:30

Figure 3: **School Opening Hours**

Phasing

- 5.13 Construction has been considered using a phased approach to allow minimal disturbance to the school. Phase 1 (the enabling works applications which are currently being determined) details the temporary school site and permanent standalone plant room. These enabling works are subject to a separate planning application.
- 5.14 Once the construction of the new temporary school building is complete the existing school building (Block B) will decant into the new temporary building.
- 5.15 Phase 2 of the development relates to the main works planning application (i.e. new permanent school building) which forms the proposal detailed within this planning application. This phase involves the demolition of the existing Block B (including basement plant room, adjacent canopies and water tower) and the construction of a new school building.
- 5.16 Construction access during phase 2 will be gained via Victoria Road. This will ensure complete segregation from the main school pupil entrance on Queens Walk. Once construction of the new school block is complete, the new school block can be occupied. The temporary school building will then be demolished and reinstated as hard standing.

Design

- 5.17 The design of the new school block has been developed in partnership with the School, alongside their needs and ethos. The design is also based on the DfE specification, guidance and input.
- 5.18 The new school block will be two storeys in height, which is in keeping with the height, mass and scale of neighbouring buildings on the wider school site, which are mostly two storeys. The linear shaped two storey school building allows for a compact layout and ensures minimal impact on the

wider school site. Due to the existing site constraints, the proposed school building allows the most efficient use of the land available.

- 5.19 The new school block will be constructed using contextual materials: brickwork and timber cladding. The material pallet has been inspired by the surrounding school buildings on the wider school site, bringing a new modern element to the design. The roof will comprise Built up reinforced bitumen membrane warm roof covering, such as IKO Gold Seal or Mach 2. The windows and doors will be PPC aluminium. The proposed canopies will consist of a clear polycarbonate canopy design to compliment the existing school canopies.
- 5.20 The façade, with a mix of textures and colours, will add visual interest in the wider school campus but maintain the surrounding areas local character.
- 5.21 Internally, the design accords with requirements set by the DFE and the needs of the School. Spaces have been designed to ensure flexibility and legibility; with all rooms accessed via a central corridor. For further details on the design of the proposals, please see the Design and Access Statement prepared by Lungfish Architects.

Parking and Access

- 5.22 No additional car parking or cycle parking is proposed as part of this development. However as discussed, during the main works phase, the site compound will be increased on part of the existing staff car parking, which involve the temporary loss of 63 no. car parking spaces. Staff will be able to temporarily use the parking at Goals to ensure there is no loss of parking space whilst construction works are underway. The proposal does not involve the permanent loss of any car parking spaces as when the construction period is finished the area will be re-provided as car parking.

Recycling and Waste Strategy

- 5.23 No additional pupils or staff are proposed as part of the development therefore no additional waste provision is required. The proposed development will connect to the existing recycling and waste facilities enabling the flow of waste to and from the central support spaces of the wider school site.

6 STATEMENT OF COMMUNITY INVOLVEMENT

- 6.1 The Applicant has carried out pre application consultation with the determining Local Planning Authority and key stakeholders to provide stakeholders with the opportunity to contribute to and shape the planning application process.

Local Planning Authority

- 6.2 London Borough of Hillingdon is the determining Local Planning Authority in relation to the proposed construction of the new replacement new two-storey teaching block.
- 6.3 Previously pre-application discussions have been held with the Council. These include:

Initial Planning Pre-Application Meeting with the London Borough of Hillingdon (05/08/2014)

- 6.4 An initial meeting with the Council was held on 5th August 2014 to discuss the emerging proposals. A number of proposed options were presented to the London Borough of Hillingdon including: (1) a window and cladding replacement to the main and G block; (2) the construction of a new teaching block close to the main entrance of Queens Walk; and (3) the replacement of existing technology block with new teaching block. In summary:
- The principle of development is unlikely to raise objections as long as issues pertaining to flood risk, drainage, design and visual amenity are thoroughly addressed through a submission;
 - A high-quality modern design will be expected to help justify the loss of a locally listed building;
 - The scheme is unlikely to have any significant impact upon residential amenity;
 - Clarity regarding an increase in pupil numbers is required and a subsequent Transport Assessment should be submitted in support of an application;
 - In terms of accessibility, all buildings must be constructed according to policies and design details outlined within the Council's SPD on Accessible Hillingdon (May 2013);
 - Due to the site lying within Flood Zone 2 and within a Critical Drainage Area, it is vital that flooding and drainage issues are addressed. Any application should be accompanied by an up to date Flood Risk Assessment and detailed Drainage Strategy;
 - An energy and sustainability statement in support of an application was advised;
 - A tree Survey and Arboricultural Implications Assessment should be provided to demonstrate the proposal will not have an unacceptable impact on trees or vegetation; and
 - Design and Layout should have regard to secured by design principles.

Follow-up Planning Pre-Application Meeting with the London Borough of Hillingdon (19/06/2017)

6.5 A follow-up pre-application meeting with the London Borough of Hillingdon to discuss the amended proposals took place on 19th June 2017. A revised scheme was considered for the demolition of the existing Design and Technology block and the construction of a new two storey teaching block to occupy a slightly larger footprint than the existing building. A written response was received on 14th November 2017. In summary:

- The entire loss of the original building would be considered regrettable unless detailed justification for the loss of the heritage asset was demonstrated;
- In terms of design, the proposed replacement building would have no objections in principle to the use of cladding at the first floor. No objections were raised to the scale mass and height of the proposal. A number of design changes were recommended including a change of materials to reflect the existing blocks and curved windows;
- Residential amenity would not be impacted by the proposal;
- It was understood that there would be no increase in pupil or staff number as a result of the proposals. Construction vehicles may have a significant impact on the surrounding roads if not managed effectively. Therefore, it was stated that any permission granted was likely to be subject to a condition relating to a Construction Management Plan prior to the commencement of development on the site;
- In terms of landscaping, it was encouraged that the courtyard should be landscaped as part of the proposals to ensure the space is integrated with the new building;
- Due to the site lying within Flood Zone 2 it was advised that a flood risk assessment, including a detailed surface water plan for the site should be submitted;
- It was advised that the proposal must be constructed according to the policies and design details outlined in the SPG Hillingdon Design and Accessibility Statement to address accessibility;
- To take into account the requirements of energy conservation, it was advised that an Energy and Sustainability Statement in support of the application should be submitted to demonstrate sustainable building measures;
- It was agreed that methods for waste management would ultimately be down to the school's discretion;
- Due to records showing the site could be contaminated, a Site Investigation Report confirming known or potential contamination issues should support an application on the site;
- It was recommended that due to the site's location on the edge of a residential area, a noise report should be submitted to demonstrate that the proposed development will not have an adverse impact on residential amenity; and
- The council have acknowledged the Ecological Appraisal that had been submitted and advise the provision of ecological enhancements to be incorporated into any scheme going forward.

Follow-up Planning Pre-Application Enquiry Meeting with the London Borough of Hillingdon (24/01/2020)

- 6.6 Once Morgan Sindall Construction and Infrastructure Ltd were appointed as Main Contractor on the scheme, a pre-application enquiry was submitted to London Borough of Hillingdon Council on 2nd January 2020 (ref: 12933/PRC/2020/1). This included details of the wider planning application strategy and proposed enabling works and main planning application proposals.
- 6.7 A formal pre application enquiry meeting took place on 24th January 2020. The Council's Planning Officer, Highways Officer and Urban Design/ Heritage Officer provided verbal and informal written comments on the Queensmead redevelopment proposals. In general, the revised proposals were positively received, with the following recommendations made:
- The principle of three planning applications (1) full planning application for the permanent plant room, (2) full planning application for the temporary classrooms and (3) full planning application for the redeveloped of Block B to gain consent for the proposed works was deemed acceptable by the Council.
 - It was advised that the demolition of the locally listed building would need to be clearly justified;
 - It was requested that details of the existing condition of Block B should be included within the full planning submission;
 - It was advised that there may be a recording requirement of the building dependent on its significance;
 - It was recommended that additional fenestration should be considered on the south elevation;
 - Specifications of the timber cladding were requested;
 - It was questioned whether the plant could be combined into the proposed new building;
 - It was advised that a Tree Survey/ Arboricultural Impact Assessment should be submitted with the main works planning application;
 - It was confirmed that a Transport Assessment/ Transport Statement would not be required for planning submission. However, a Construction Logistics Plan should be submitted with the full planning application; and
 - It was advised that the site suffers from significant flooding issues and this should be considered in any development on site.
- 6.8 The scheme was further developed as a result of the above and full details of these changes are included in the accompanying Design and Access Statement prepared by Lungfish Architects. In summary:

- It is not possible to incorporate the proposed plant room into the main school building as the existing basement plantroom powers the school site, therefore the development has had to be phased to ensure that the plant room is in place before the basement plant room is decommissioned. In addition, incorporating the plant room into the new building would reduce the number of windows proposed and cause potential noise issues;
- The existing Block B is in a poor state of repair and in need of modernisation. The provision of a new teaching block is the only viable alternative to ensure the educational needs of existing and future pupils are met. The proposal will allow the school to operate from a modern, efficient and fit for purpose accommodation. The proposed new building is designed to complement and link in with the existing buildings on site. A Heritage Statement has been prepared as part of this main works planning application which assesses the significance of the building and the impact of the proposed development upon the existing site;
- A basic level 2 building recording will be undertaken prior to demolition and stored within the local/ school archives as recommended within the Heritage Statement which will further mitigate the minor heritage impact;
- A new window within the stair core has been introduced as part of the development of the proposal following the meeting and included as part of the final planning submission;
- A Tree Survey/ Arboricultural Impact Assessment and Construction Logistics Plan has been submitted as part of the main works planning application; and
- The finished floor levels (FFL) have been increased to address the Flood Officer's concerns.

Stakeholder

Public Engagement Event

- 6.9 The public engagement event focused on presenting the proposed redevelopment of the school to staff, parents, councillors and the surrounding community and sought to ensure that all interested parties were provided with an opportunity to be involved in the pre-application planning process and provide feedback.
- 6.10 The public engagement event took place on 24th February 2020 between 16:00 and 19:00, which staff, local councillors, parents and residents were invited to attend.
- 6.11 Information flyers were distributed in advance of this date to all properties within a 50m radius of the school building inviting residents to a drop-in session in relation to the school redevelopment. Flyers were also sent to parents of current school children and local councillors.
- 6.12 The event was relatively well attended by local residents and parents with 5 people attending the event on the night. A total of 2 feedback forms were completed on the day.

6.13 A summary of the responses is provided below:

- **The majority of the attendees were in favour of the development with overwhelmingly positive feedback received.**

6.14 *Comment:* Many comments welcomed the redevelopment proposals of Block BI with layout changes enabling greater optimisation of external space. The modern design was viewed positively by parents and residents alike.

6.15 *Response:* It was well known that a new school building was required in order to replace the existing facility, which is in poor condition and considered dilapidated.

- **Concerns over disruption during construction period**

6.1 *Comment:* Concerns were raised over the disruption to pupils during the construction period.

6.2 *Response:* Construction will take place during working hours, with no construction taking place during the evenings and weekends. Construction deliveries will be managed to ensure that they are not undertaken during peak periods and do not clash with school pick up/drop off times. There will be a separate construction access for the site to minimise disruption to pupils, and to ensure the construction site is kept separate to the operation of the school. The spread of dust and debris will be managed through protection measures as detailed in the accompanying Construction Management Plan prepared by Morgan Sindall Construction and Infrastructure. The construction period will last approximately 1 year and will be phased appropriately so that the school can operate safely and efficiently during this time. Once the construction plan was explained to parents and residents, they were more comfortable with the proposals.

6.3 A Construction Management Plan will be included with the full planning application which will detail the number of vehicle trips, types of construction vehicles and proposed working hours on site.

- **Concerns over car parking**

6.4 *Comment:* Concerns were raised over the effect the proposals would have on the loss of car parking spaces on site.

6.5 *Response:* These concerns were noted, and it was explained that there is no permanent loss of car parking as part of this development. However, during the main works phase, the site compound will be increased on part of the existing staff car parking, which involve the temporary loss of 63 no. car parking spaces. The proposal does not involve the permanent loss of any car parking spaces as when the construction period is finished the area will be re-provided as car parking. Staff will be able to

temporarily use the parking at Goals to ensure there is no loss of parking space whilst construction works are underway. Once this was explained, most attendees were comfortable with the proposals.

- **Concerns over the quality of Design Technology (DT) teaching facilities during the construction works**

6.6 *Comment:* One parent raised concern over the quality of the design technology teaching facilities during the construction works.

6.7 *Response:* It was explained that there would be no loss of quality of the design technology facilities as part of the redevelopment proposals. Phase 1 of the proposed works (subject to separate planning application) relates to the enabling works which comprises the erection of on-site temporary classrooms. These enabling works will be completed in advance of the proposed main works redevelopment of Block B to ensure there is no loss of teaching provision which the redevelopment is taking place.

- **Concerns over asbestos removal during demolition of existing building**

6.8 *Comment:* Concerns were raised over the asbestos removal and the safety issues surrounding this.

6.9 *Response:* The removal of asbestos will be conducted safely and securely in line with Regulatory requirements. The site will be hoarded off to ensure no pupils, staff or members of the public can access the building during demolition.

7 PLANNING POLICY CONTEXT

7.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with policies contained within the Statutory Development Plan unless material considerations indicate otherwise. The Development Plan for London Borough of Hillingdon comprises:

- The Hillingdon Local Plan: Part 1- Strategic Policies;
- The Hillingdon Local Plan: Part 2- Development Management Policies;
- The Hillingdon Local Plan: Part 2- Site Allocations and Designations;
- The London Plan (Revised 2017).

7.2 In addition, the Revised National Planning Policy Framework ('NPPF') (2019), National Planning Practice Guidance ('NPPG') (2014) and Government Policy Statement – Planning for Schools Development (2011) alongside the draft New London Plan (2018) are relevant material considerations, as are any supplementary planning documents (SPD).

Designations

7.3 The application site is not allocated within the adopted London Borough of Hillingdon Local Plan Part 2 Policies Map (2019). A Nature Conservation Sites of Borough Grade II or Local Importance lies 170m to the south of the school site. A Strategic Industrial Location lies 90m south east of the school site.

7.4 The site is not in a Conservation Area and there are no statutory Listed Buildings on site. However, Block B is Locally Listed and forms part of a group of buildings designed by Yorke, Rosenberg and Mardall Architects in 1953.

7.5 A search of the Environment Agency (EA) Flood Map shows that the application site lies within Flood Zone 1; therefore, land and property in this area have a low probability of flooding. The entire school site also falls within a Critical Drainage Area.

7.6 The site is not within any Area of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI) or Special Protection Areas (SPA).

7.7 The following section provides a summary of the planning policy context relevant to the consideration of this application. The purpose of this section is to draw out key policy themes at national, regional and local level relevant to the application site and its proposed redevelopment. The assessment has been provided under the following thematic policy issues;

- General Approach to Planning;

- Principle of Use;
- Loss of non-designated heritage asset;
- Design;
- Transport and Parking; and
- Environmental Considerations.

General Approach to Planning

Revised NPPF (2019)

7.8 The Revised NPPF (2019) sets out Government planning policies for England, and how they are to be applied. It totally supersedes previous the National Planning Policy Framework (2012), Planning Policy Guidance and Planning Policy Statements except for Waste Management, which is not relevant to this development. The Revised NPPF must be taken into account when local development plans are produced and is a material consideration in planning application decisions by Local Planning Authorities.

7.9 At the heart of the Revised NPPF and wider Government guidance is the presumption in favour of sustainable development (paragraph 10). This commitment to sustainable development should be achieved through three mutually supportive overarching objectives: an economic objective, a social objective, and an environmental objective. In this regard paragraph 8 of the Revised NPPF states:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective– to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective– to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective– to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity,

using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy

- 7.10 The presumption in favour of sustainable development for planning determinations means:
- Approving development proposals that accord with an up-to-date development plan without delay; or
 - Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

London Plan

- 7.11 The London Plan sets out the Mayor's overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.
- 7.12 Under the legislation setting up the GLA, the London Plan should only deal with developments of strategic importance to Greater London. The legislation also required that the London Plan should take account of three cross-cutting themes: economic development and wealth creation, social development and improvement of the environment.

Local Plan Part 1

- 7.13 Local Plan Policy NPPF1 reflects the NPPF's presumption in sustainable development. Supporting the aims set out in the NPPF, the policy states that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- 7.14 This policy further states that planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Principle of Use

- 7.15 This application proposes the demolition of the existing Block B (including basement plant room, adjacent canopies and water tower) and the construction of a new two-storey school building (D1). Given the D1 use of the existing buildings on site, the proposed use is considered acceptable and well established. No change of use is required in relation to the existing site change of use is not required, and the principal of development is considered acceptable.
- 7.16 The existing Block B is in a poor state of repair and in need of modernisation. The provision of a new teaching block is the only viable alternative to ensure the educational needs of existing and future pupils are met. Within pre-application discussions, the Council acknowledged that the existing building was in relatively poor condition and in need of modernisation, very inefficient in terms of energy use and provided far from ideal modern teaching environment. The proposal will allow the school to operate from a modern, efficient and fit for purpose accommodation.
- 7.17 This section assesses the compliance of the proposal against relevant national, regional and local planning policy.

Revised NPPF

- 7.18 National Guidance in the form of the Revised NPPF supports the need to ensure that an adequate number of school places and facilities are available to meet the needs of existing and future communities.
- 7.19 Paragraph 94 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. They should:

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

DCLG Policy Statement - Planning for Schools Development (August 2011)

- 7.20 In August 2011, the DCLG published a policy statement which sets out the Government’s commitment to support the development of state funded schools and their delivery through the planning system. It demonstrates that the Government is firmly committed to ensuring that there is sufficient provision

to meet growing demand for state-funded school places, increasing choice and opportunity in state-funded education and raising educational standards.

- 7.21 The statement reinforces the Government's commitment to enabling new schools to open, good schools to expand and all schools to adapt and improve their facilities. This will allow for more provision and greater diversity in the state-funded school sector to meet both demographic needs and the drive for increased choice and higher standards.
- 7.22 It is expected that all parties will work together proactively from an early stage to help plan for state-school development and to shape strong planning applications. This collaborative working should help to ensure that the answer to proposals for the development of state-funded schools should be, wherever possible, approved.
- 7.23 The document sets out that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools, and that the following principles should apply with immediate effect:
- There should be a presumption in favour of development of state-funded schools, as expressed in the NPPF.
 - Local Authorities should give full and thorough consideration to the importance of enabling the development of state funded schools in their planning decisions.
 - Local Authorities should make full use of their planning powers to support state-funded schools applications.
 - Local authorities should only impose conditions that clearly and demonstrably meet the tests set out in Circular 11/95.
 - Local authorities should ensure that the process for submitting and determining state-funded schools' applications is as streamlined as possible.
 - A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority.
 - Appeals against any refusals of planning permission for state-funded schools should be treated as a priority.
- 7.24 Where a local planning authority refuses planning permission for a state-funded school, the Secretary of State will consider carefully whether to recover for his own determination appeals against the refusal of planning permission.

London Plan

- 7.25 Policy 3.16 states that development proposal which provide high quality social infrastructure will be supported in light of local and strategic social infrastructure needs assessments. Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for reprovision should be resisted. The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.
- 7.26 Facilities should be accessible to all sections of the community (including disabled and older people) and be located within easy reach by walking, cycling and public transport. Wherever possible, the multiple use of premises should be encouraged.
- 7.27 Policy 3.18 states that the Mayor will support provision of childcare, primary and secondary school, and further and higher education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice, including in parts of London with poor educational performance.
- 7.28 Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes. Those which address the current and projected shortage of primary school places and the projected shortage of secondary school places will be particularly encouraged. Proposals which result in the net loss of education facilities should be resisted, unless it can be demonstrated that there is no ongoing or future demand.
- 7.29 Development proposals which maximise the extended or multiple use of educational facilities for community or recreational use should be encouraged.

Local Plan Part 1

- 7.30 Policy CI1 states that the council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations by:
1. Resisting of the loss of community facilities, and where the loss of these facilities is justified it will seek to ensure that resulting development compensates these uses to ensure no net loss;
 2. Supporting the retention and enhancement of existing community facilities;
 3. Supporting extensions to existing schools and the development of new schools and youth facilities;
 4. Encouraging the development of multi-purpose facilities that can provide a range of services and facilities to the community at one accessible location;

5. Promoting innovation in service provision and recognising that there are a range of modes appropriate for providing for all sections of the community;
6. Requiring development to contribute towards the provision of community facilities to meet the needs of new communities and mitigate impacts on existing communities;
7. Locating libraries, health facilities, police facilities, leisure facilities and community centres in town centres or other accessible locations to maximise community access, sustainable transport and build a sense of local community identity;
8. Ensuring new facilities demonstrate how they will tackle climate change, in line with Policy EM1;
9. Providing facilities and services that are accessible and inclusive to all potential users regardless of age, ability, gender or socio-economic status; and
10. Implementing a borough-wide Community Infrastructure Levy (CIL) to fund community infrastructure provision.

Local Plan Part 2

- 7.31 Policy DMCI 1 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.
- 7.32 Policy DMCI 1A 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.

7.33 Policy DMCI 2 states that proposals for the refurbishment and re-use of existing premises for community facilities will be supported.

7.34 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.

Compliance with Policy

7.35 It is evident that planning policy at all levels seeks to encourage the improvement of existing educational facilities through their redevelopment or expansion in order to enhance education and skills provision. Policy also seeks to resist the loss of existing of existing educational facilities or services.

7.36 The proposed development accords with policy at all levels in that it seeks to address the current poor condition of the school and its improvement to allow enhanced education and skills provision. Therefore, there will be no loss of existing educational facilities. No pupil places are lost as a result of this application. The proposal specifically aligns to policies DMCI 1 and 2 in that there is no loss of existing community facilities and the re-use of the existing footprint is supported. Therefore, the principle of development is considered acceptable.

Loss of Non-Designated Heritage Asset

Revised NPPF

7.37 Paragraph 189 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made

by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

- 7.38 Paragraph 197 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

London Plan

- 7.39 Policy 7.8 states that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Local Plan Part 1

- 7.40 Policy HE1 states that the Council will:
1. Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes Locally recognised historic features, such as Areas of Special Local Character and Locally Listed Buildings
 2. Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant.
 3. Promote increased public awareness, understanding of and access to the borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities.
 4. Encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset.

Local Plan Part 2

- 7.41 Policy DMHB1 states that the Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:
- I. sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;
 - II. it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;
 - III. it makes a positive contribution to the local character and distinctiveness of the area;
 - IV. any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset
 - V. the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;
 - VI. buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and
 - VII. opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.
- 7.42 Development proposals affecting designated heritage assets need to take account of the effects of climate change and renewable energy without impacting negatively on the heritage asset. The Council may require an alternative solution which will protect the asset yet meet the sustainability objectives of the Local Plan.
- 7.43 The Council will seek to secure the repair and reuse of Listed Buildings and monuments and improvements to Conservation Areas on the Heritage at Risk Register, through negotiations with owners, the provision of advice and guidance, the use of appropriate legal action, and through bids for external funding for improvement works.
- 7.44 Policy DMHB3 states that there is a general presumption in favour of the retention of buildings, structures and features included in the Local List. The Council will take into account the effect of a proposal on the building's significance and the scale of any harm of loss when considering planning applications, including those for major alterations and extensions. Proposals will be permitted where they retain the significance, appearance, character or setting of a Locally Listed Building.

- 7.45 Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the structure and the impact of the proposals on the significance of the Locally Listed Building.
- 7.46 Replacement will only be considered if it can be demonstrated that the community benefits of such a proposal significantly outweigh those of retaining the Locally Listed Building.

Compliance with Policy

- 7.47 The proposed development is not located within an Archaeological Priority Zone nor is it located within a Conservation Area; therefore, it has been confirmed that an archaeological assessment is not required. However, the existing Block B is Locally Listed therefore a Heritage Statement has been prepared by MOLA in support of this planning application.
- 7.48 The initial pre-application feedback (ref: 12933/PRC/2017/77) commented that although Block B is locally listed, the buildings are of limited architectural merit, are in relatively poor condition and in need of modernisation, very inefficient in terms of energy use and they provide a far from ideal modern teaching environment. It should also be noted the local list makes no specific mention of them. The Council's Conservation and Urban Design Officer has confirmed that, providing sufficient justification is provided for their loss within any submission made and that any replacement building is of a high-quality design, their loss might be justified and could be considered.
- 7.49 The existing Block B is in a poor state of repair and in need of modernisation. The provision of a new teaching block is the only viable alternative to ensure the educational needs of existing and future pupils are met. The proposal will allow the school to operate from a modern, efficient and fit for purpose accommodation. The proposed new building is designed to complement and link in with the existing buildings on site and function of the site and ensure flexibility of teaching, plus meeting needs of current and future curriculum, with the introduction of high- quality flexible teaching spaces on two levels.
- 7.50 The Heritage Statement concludes that while the loss of Block B to be replaced by a new build will result in a minor heritage impact, the new proposed build will incorporate many design aspects particular to the school and its architects. The design of the block is focused on delivering high quality teaching spaces and has therefore taken an education first approach. The new and increased facilities will also be of great public benefit to the students of the school, which will outweigh the minor heritage impact.
- 7.51 The development proposal is therefore considered to align with the NPPF, London Plan Policy 7.8 and Policy DMHB1 as the proposal will result in a minor heritage impact with the benefits of the proposal outweighing the loss.

Design

Revised NPPF

- 7.52 Paragraph 8 of the Revised NPPF seeks to pursue sustainable development by fostering a well-designed and safe built environment.
- 7.53 Paragraph 124 of the Revised NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 7.54 Paragraph 127 states that planning policies and decision should ensure that developments:
- Will function well and add to the overall quality of the area, not just for the short term but the lifetime of the development;
 - Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as densities);
 - Establish or maintain a strong sense of place, using the arrangements of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 7.55 Paragraph 126 states that the plans and supplementary planning documents provide a framework for creating distinctive places, with a consistent and high-quality standard of design. However, their level of detail and degree of prescription should be tailored to the circumstances in each place and should allow for a suitable degree of variety where this would be justified.
- 7.56 Paragraph 128 states that design quality should be considered throughout the evolution and assessment of individual proposals. Early discussions between applications, the local planning

authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the view of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

London Plan

7.57 Policy 7.4 (Local character) refers proposals to incorporate new buildings into its local context and providing a high-quality design response that:

- has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass;
- contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area;
- is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings;
- allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area; and
- is informed by the surrounding historic environment.

7.58 Policy 7.6 (Architecture) dictates that new buildings should:

- be of the highest architectural quality;
- be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;
- comprise details and materials that complement, not necessarily replicate, the local architectural character;
- not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings;
- incorporate best practice in resource management and climate change mitigation and adaptation;
- provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;
- be adaptable to different activities and land uses, particularly at ground level;
- meet the principles of inclusive design; and

- optimise the potential of sites.

Local Plan Part 1

7.59 Local Plan Policy BE1 states that the Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new development should:

- Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;
- Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties
- Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;
- Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;
- Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals

Local Plan Part 2

7.60 Policy DMHB 11 states that 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.
- 7.61 Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- 7.62 Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential.
- 7.63 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.
- 7.64 Policy DMHB 12 states that development should be well integrated with the surrounding area and accessible. It should:
- i) improve legibility and promote routes and wayfinding between the development and local amenities;
 - ii) ensure public realm design takes account of the established townscape character and quality of the surrounding area;

- iii) include landscaping treatment that is suitable for the location, serves a purpose, contributes to local green infrastructure, the appearance of the area and ease of movement through the space;
 - iv) provide safe and direct pedestrian and cycle movement through the space;
 - v) incorporate appropriate and robust hard landscaping, using good quality materials, undertaken to a high standard;
 - vi) where appropriate, include the installation of public art; and vii) deliver proposals which incorporate the principles of inclusive design. Proposals for gated developments will be resisted.
- 7.65 Policy DMHB 15 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.
- 7.66 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.

Compliance with Policy

- 7.67 The proposal seeks to achieve a high-quality design that adds to the overall quality of the area and responds to the local character. The applicant has worked closely, the local community and the Local Planning Authority to evolve a design which takes account of the views of all parties
- 7.68 In accordance with policies set out in Hillingdon's Local Plan Part 1 and 2, the proposed design has taken the appearance, scale, mass, height, pattern and spaces of surrounding buildings into consideration. As such the two-storey school building will be in keeping with the scale of the area, with surrounding buildings mostly two storeys.
- 7.69 The new school building has been designed in a linear shape and suitably located at the centre of the school to be suitably located for the existing service routes and close proximity to the existing buildings and access around the site. The new building will not significantly impact neighbouring buildings and so there will be minimal impact on the wider school site. Due to the existing site constraints, the proposed school building allows the most efficient use of the land available.

- 7.70 The building has been designed using durable materials and is therefore aesthetically pleasing. The school building will be constructed using brick and timber cladding. The material palette has been inspired by the surrounding school buildings. The façade, with a mix of textures and colours, will add visual interest to the surrounding area but maintain the surrounding areas local character.
- 7.71 The proposed development has been designed in accordance with the principles of secured by design as such the building and reinstated fence create a clearly deigned boundary to the school grounds and car park. All doors and windows are sited behind these security measure and limit the chance of tree pass. The glazing to the southern façade, due to the nature of the existing site also sits approximately 1.5m above the external ground line. In addition, External lighting is included as part of the proposal to ensure suitable lux levels are achieved, to increase the opportunity to detect intruders, this has been developed in accordance with the reinstated CCTV provision on the new teaching block
- 7.72 It is therefore considered that the proposed development accords with policy at all levels as the design reflects the local scale and form and is highly accessible.

Trees and Landscaping

London Plan

- 7.73 Policy 7.21 states that existing trees of value should be retained and any loss as the result of development should be replacement following the principle of 'right place, right tree'. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species

Local Plan Part 2- Development Management Policies

- 7.74 Policy DMHB 14 states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
- 7.75 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.
- 7.76 Where space for ground level planting is limited, such as high-rise buildings, the inclusion of living walls and roofs will be expected where feasible.
- 7.77 Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be

required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.

Compliance with policy

- 7.78 The application site has no trees within its boundary; however, the wider school site has a number of trees which are covered by a Tree Preservation Order. The Tree Survey, conducted by Arbtech, identified a total of 4 no. individual trees, 1 no. hedge and 1 no. group of trees within close proximity to the application site. The survey concluded that the proposed development does not require the removal of any trees. In addition, the proposed development does not impact upon any retained trees. An Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan is included in support of this planning application. It is therefore considered that the proposal satisfies the requirements of Local Plan Policy DMHB 14 and London Plan Policy 7.21.

Refuse and Recycling

Local Plan Part 2

- 7.79 Policy DMHB 11 states that 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.

Compliance with Policy

- 7.80 The schools existing waste arrangements will continue existing. The proposed development will simply connect to the existing recycling and waste facilities enabling the flow of waste to and from the central support spaces of the wider school site. It is therefore considered that the proposal satisfies the requirements of Local Plan Policy DMHB 11.

Transport and Parking

Revised NPPF

- 7.81 Paragraph 102 of the Revised NPPF states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
- the potential impacts of development on transport networks can be addressed;
 - opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;

- opportunities to promote walking, cycling and public transport use are identified and pursued;
 - the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
 - patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.
- 7.82 Paragraph 103 of the Revised NPPF states that significant development should be focused on locations which are or can be made sustainable, though limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.
- 7.83 Paragraph 105 states if setting parking standards for residential and non-residential development, policies should take into account:
- The accessibility of the development;
 - The type, mix and use of the development;
 - The availability of and opportunities for public transport;
 - Local car ownership levels; and
 - The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.
- 7.84 Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in the city and other locations that are well served by public transport.
- 7.85 Paragraph 108 states that when assessing sites for development it should be ensured that:
- Appropriate opportunities to promote sustainable transport modes can be- or have been- taken up, given the type of development and its location;
 - Safe and suitable access to the site can be achieved for all users; and
 - Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 7.86 Paragraph 109 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

7.87 Paragraph 110 states that applications for development should:

- Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- Allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

7.88 Paragraph 111 states that all developments that will generate significant amounts of movements should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

London Plan

7.89 Policy 6.3 states that Development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.

7.90 Where existing transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans exist for an increase in capacity to cater for this, boroughs should ensure that development proposals are phased until it is known these requirements can be met, otherwise they may be refused. The cumulative impacts of development on transport requirements must be taken into account.

7.91 Transport assessments will be required in accordance with TfL's Transport Assessment Best Practice Guidance for major planning applications. Workplace and/or residential travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance. Construction logistics plans and delivery and servicing plans should be secured in line with the London Freight Plan and should be co-ordinated with travel plans.

7.92 Policy 6.9 states that developments should:

- a. provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3 and the guidance set out in the London Cycle Design Standards (or subsequent revisions)
- b. provide on-site changing facilities and showers for cyclists
- c. contribute positively to an integrated cycling network for London by providing infrastructure that is safe, comfortable, attractive, coherent, direct and adaptable and in line with the guidance set out in the London Cycle Design Standards (or subsequent revisions)
- d. provide links to existing and planned cycle infrastructure projects including Cycle Superhighways, Quietways, the Central London Grid and the 'mini-Hollands'
- e. facilitate the Mayor's cycle hire scheme through provision of land and/or planning obligations where relevant, to ensure the provision of sufficient capacity.

7.93 Policy 6.10 states that the Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasizing the quality of the pedestrian and street environment, including the use of shared space principles, – promoting simplified streetscape, decluttering and access for all.

7.94 Policy 6.13 states that The Mayor wishes to see an appropriate balance between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.

7.95 Car parking should not exceed maximum standards set out in Table 6.2. Table 6.2 states that there should be one blue badge parking space per each disabled motorist in a workplace, with 5% of spaces being for blue badge holders.

Local Plan Part 1

7.96 Policy T1 states that the Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision. The Council will ensure access to local destinations which provide services and amenities. The Council will promote active travel through improvements to Hillingdon's public rights of way.

Local Plan Part 2

- 7.97 Policy DMT 1 states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable they are required to: i) be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development; ii) maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users; iii) provide equal access for all people, including inclusive access for disabled people; iv) adequately address delivery, servicing and drop-off requirements; and v) have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.
- 7.98 Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds. All major developments that fall below these thresholds will be required to produce a satisfactory Transport Statement and Local Level Travel Plan. All these plans should demonstrate how any potential impacts will be mitigated and how such measures will be implemented.
- 7.99 Policy DMT 2 states that development proposals must ensure that: i) safe and efficient vehicular access to the highway network is provided to the Council's standards; ii) they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents; iii) safe, secure and convenient access and facilities for cyclists and pedestrian are satisfactorily accommodated in the design of highway and traffic management schemes; iv) impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads; and v) there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads, including along roads or through junctions which are at capacity.
- 7.100 Policy DMT 5 states that development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network, including: i) the retention and, where appropriate, enhancement of any existing pedestrian and cycle routes; ii) the provision of a high quality and safe public realm or interface with the public realm, which facilitates convenient and direct access to the site for pedestrian and cyclists; iii) the provision of well signposted, attractive pedestrian and cycle routes separated from vehicular traffic where possible; and iv) the provision of cycle parking and changing facilities in accordance with Appendix C, Table 1 or, in agreement with Council.
- 7.101 Policy DM 6 states that development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity. The Council may agree to vary these requirements when: i) the variance

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

Compliance with Policy

- 7.102 There is no pupil or staff expansion planned as part of redevelopment proposals. Furthermore, no alterations to the existing car park or access arrangements are proposed. Therefore, the proposal is not considered to have adverse impact on the surrounding highway network give there will be no increase in staff or pupil numbers. The Highways Officer has therefore confirmed that no Transport Assessment and/or Transport Statement would be required as part of this planning application.

Environmental Considerations

Flooding

Revised NPPF

- 7.103 Paragraph 155 states that inappropriate development in areas at risk of flooding should be avoided directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

London Plan

- 7.104 Policy 5.12 states that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk over the lifetime of the development and have regard to measures proposed in Thames Estuary 2100 and Catchment Flood Management Plans.
- 7.105 Policy 5.13 states that development should 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.
- 7.106 Policy 5.14 states that development proposals must ensure that adequate wastewater infrastructure capacity is available in tandem with development. Proposals that would benefit water quality, the delivery of the policies in this Plan and of the Thames River Basin Management Plan should be supported while those with adverse impacts should be refused.
- 7.107 Policy 5.15 states that development should minimise the use of mains water by incorporating water saving measures and equipment.

Local Plan Part 1

- 7.108 Policy EM6 states that the Council will require new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the National Planning Policy Framework (NPPF).
- 7.109 The subsequent Hillingdon Local Plan: Part 2 -Site Specific Allocations LDD will be subjected to the Sequential Test in accordance with the NPPF. Sites will only be allocated within Flood Zones 2 or 3 where there are overriding issues that outweigh flood risk. In these instances, policy criteria will be set requiring future applicants of these sites to demonstrate that flood risk can be suitably mitigated.
- 7.110 The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long-term maintenance and performance of SUDS is to an appropriate standard.

Local Plan Part 2

- 7.111 Policy DMEI 9 states that development proposals in Flood Zones 2 and 3a will be required to demonstrate that there are no suitable sites available in areas of lower flood risk. Where no appropriate sites are available, development should be located on the areas of lowest flood risk within the site. Flood defences should provide protection for the lifetime of the development. Finished floor levels should reflect the Environment Agency's latest guidance on climate change.
- 7.112 Development proposals in these areas will be required to submit an appropriate level Flood Risk Assessment (FRA) to demonstrate that the development is resilient to all sources of flooding.
- 7.113 Developments may be required to make contributions (through legal agreements) to previously identified flood improvement works that will benefit the development site. Proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.
- 7.114 Policy DMEI 10 states that applications for all new build developments (not conversions, change of use, or refurbishment) are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy (Policy 5.13: Sustainable drainage).
- 7.115 All major new build developments, as well as minor developments in Critical Drainage Areas or an area identified at risk from surface water flooding must be designed to reduce surface water run-off rates to no higher than the pre-development greenfield run-off rate in a 1:100 year storm scenario, plus an appropriate allowance for climate change for the worst storm duration. The assessment is required regardless of the changes in impermeable areas and the fact that a site has an existing high run-off rate will not constitute justification.

- 7.116 Rain Gardens and non-householder development should be designed to reduce surface water run-off rates to Greenfield run-off rates.
- 7.117 Schemes for the use of SuDS must be accompanied by adequate arrangements for the management and maintenance of the measures used, with appropriate contributions made to the Council where necessary.
- 7.118 Proposals that would fail to make adequate provision for the control and reduction of surface water run-off rates will be refused.
- 7.119 Developments should be drained by a SuDs system and must include appropriate methods to avoid pollution of the water environment. Preference should be given to utilising the drainage options in the SuDS hierarchy which remove the key pollutants that hinder improving water quality in Hillingdon.
- 7.120 All new development proposals (including refurbishments and conversions) will be required to include water efficiency measures, including the collection and reuse of rainwater and grey water.
- 7.121 It is expected that major development proposals will provide an integrated approach to surface water run-off attenuation, water collection, recycling and reuse
- 7.122 All new development proposals will be required to demonstrate that there is sufficient capacity in the water and wastewater infrastructure network to support the proposed development. Where there is a capacity constraint the local planning authority will require the developer to provide a detailed water and/or drainage strategy to inform what infrastructure is required, where, when and how it will be delivered.

Compliance with Policy

- 7.123 The application site is located within Flood Zone 2 and a Critical Drainage Area. The Revised NPPF defines Flood Zone 2 as land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year.
- 7.124 The Flood Risk Assessment, prepared by MTC Engineering, concludes that to ensure that the replacement building is adequately protected against flooding the finished floor level will be set at a minimum level of 35.49m AOD. This provides more than 1m freeboard above the 1 in 100 year plus 35% climate change water level, 840mm above the 1 in 100 year plus 70% climate change water level, and 150mm above the 150mm above the 1 in 1000 year fluvial flood level. It will also ensure that the building is adequately protected against potential surface water flooding. No further flood resistant or resilient construction is required in this instance.

- 7.125 A separate drainage strategy has been prepared in compliance with current national and local policies and guidance. This strategy will incorporate SuDS features assessed in accordance with current guidance and best practice.
- 7.126 The proposed new building is served by the existing wastewater infrastructure therefore it has not been considered necessary to provide a Waste Cycle Study. This has been confirmed with the London Borough of Hillingdon.
- 7.127 It is therefore considered that the proposal satisfies the requirements of the National Planning Policy Framework, London Plan Policies and Local Plan Policies. Please refer to the accompanying Flood Risk Assessment for full details.

Residential Amenity

Revised NPPF

- 7.128 Paragraph 180 states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effect (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:
- Mitigate and reduce to a minimum potential adverse impact resulting from noise from new development- and avoid noise giving rise to significant adverse impacts on health and the quality of life;
 - Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
 - Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservations.

London Plan

- 7.129 London Plan Policy 7.6 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.

Local Plan Part 1

- 7.130 Policy EM8 states that The Council will investigate Hillingdon's target areas identified in the Defra Noise Action Plans, promote the maximum possible reduction in noise levels and will minimise the number of people potentially affected. The Council will seek to identify and protect Quiet Areas in

accordance with Government Policy on sustainable development and other Local Plan policies. 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.

Compliance with Policy

- 7.131 The proposed new classroom block is situated on the footprint of the current building which lies centrally within the Queensmead School site and is therefore at a substantial distance from residential neighbours. The proposed two-storey building is in keeping with the height and scale of surrounding buildings therefore there will be no unacceptable overbearing and overshadowing impacts on surrounding properties. This will prevent any effect on residential amenity of surrounding properties.
- 7.132 A Noise Assessment has been produced by Stroma, which has been used to inform the design of the new school building. The report concludes that based on the measured noise levels, the indoor ambient noise level requirements of BB93 could be satisfied through a scheme of natural ventilation for ground floor practical spaces, in conjunction with a hybrid/mechanical ventilation strategy for first floor classrooms.
- 7.133 The site is not located within an Air Quality Management Area, nor does the proposals include biomass/ CHP therefore an Air Quality Assessment is not required for submission.
- 7.134 It is therefore considered that the proposal satisfies the requirements of the National Planning Policy Framework, London Plan Policies and Local Plan Policies. Please refer to the accompanying Noise Assessment for full details.

Sustainability

Revised NPPF

- 7.135 Paragraph 148 states that the planning system should support the transition to a low carbon future in a changing climate.
- 7.136 It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

London Plan

- 7.137 Policy 5.2 (Minimising Carbon Dioxide emissions) seeks accordance with the energy hierarchy of:

- Be lean: use less energy;
 - Be clean: supply energy efficiently; and
 - Be green: use renewable energy.
- 7.138 The policy goes on to strive for minimum improvements over the Target Emission Rate (TER) (as per Building Regulations 2010) to be met. For residential buildings, the target is Zero carbon. This target should be met on site, although where clearly demonstrated, any shortfall may be provided off-site or by a cash in lieu contribution.
- 7.139 Policy 5.3 (Sustainable design and construction) requires the demonstration of sustainable design standards, including for construction and operation, to be considered from the start of the design process. The policy refers to the Mayor's Sustainable Design and Construction SPG and emphasises the following design principles to be met:
- minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems);
 - avoiding internal overheating and contributing to the urban heat island effect;
 - efficient use of natural resources (including water), including making the most of natural systems both within and around buildings;
 - minimising pollution (including noise, air and urban runoff);
 - minimising the generation of waste and maximising reuse or recycling;
 - avoiding impacts from natural hazards (including flooding);
 - ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions;
 - securing sustainable procurement of materials, using local supplies where feasible, and
 - promoting and protecting biodiversity and green infrastructure.
- 7.140 Policy 5.6 (Decentralised energy in development proposals) seeks major development proposals to incorporate Combined Heat and Power (CHP) systems, selecting the system in accordance with the following hierarchy:
- Connection to existing heating or cooling networks;
 - Site wide CHP network;
 - Communal heating and cooling.
- 7.141 Policy 5.7 (Renewable energy) refers to the energy hierarchy (see Policy 5.2) and the reduction in carbon dioxide emissions through the use of on-site renewable energy generation. There is a

presumption that all major development proposals will seek to reduce carbon dioxide emissions by at least 20 per cent through on-site renewable energy generation, wherever feasible.

Local Plan Part 1

7.142 Policy EM1 (Climate Change Adaption and Mitigation) states that the council will aim to ensure that climate change mitigation is addressed at every stage of the development process in a number of ways including:

- Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport.
- Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency.
- Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market.
- Working with developers of major schemes to identify the opportunities to help provide efficiency initiatives that can benefit the existing building stock.
- Promoting the use of decentralised energy within large scale development whilst improving local air quality levels.
- Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions.
- Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation(39) as part of their proposals.
- Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.
- Promoting new development to contribute to the upgrading of existing housing stock where appropriate. The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:
 - Locating and designing development to minimise the probability and impacts of flooding.
 - Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.
 - Giving preference to development of previously developed land to avoid the loss of further green areas.

Local Plan Part 2

- 7.143 Policy DMEI 2 (Reducing Carbon Emissions) requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with the London Plan targets. Furthermore, major development must be accompanied by an energy assessment showing how these reductions can be achieved.
- 7.144 Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, where it is clearly demonstrated that the targets for carbon emissions cannot be met onsite, the Council may approve the application and seek an off-site contribution to make up for the shortfall.
- 7.145 Policy DEMI 3 (Decentralised Energy) states that the council will expect all major developments to be designed to be able to connect to a Decentralised Energy Network (DEN)

Compliance with Policy

- 7.146 The existing school building is inadequate in terms of energy use and needs to be improved as to comply with regulations. At the current stage of the project the design does not currently meet the GLA London plan requirements. However, it has been agreed with the Council's Sustainability Officer that the London Plan policy requirements will be developed/ considered during the determination period. Please refer to the accompanying Energy Statement for full details.

Ecology

Revised NPPF

- 7.147 Paragraph 170 of Revised NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by:
- Protecting and enhancing value landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services- including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - Maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

- Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

7.148 Paragraph 174 states that to protect and enhance biodiversity and geodiversity, plans should:

- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creations; and
- Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

London Plan

7.149 Policy 7.19 concerns biodiversity and states that proposals should, wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

Local Plan Part 1

7.150 Policy EM7 (Biodiversity and Geological Conservation) aims to preserve and enhance Hillingdon's biodiversity and geological conservation, with particular attention give to:

1. The conservation and enhancement of the natural state of: Harefield Gravel Pits Colne Valley Regional Park Fray's Farm Meadows Harefield Pit
2. The protection and enhancement of all Sites of Importance for Nature Conservation. Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss. Borough Grade 2 and Sites of Local Importance will be protected from loss with harmful impacts mitigated through appropriate compensation.
3. The protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plans.

4. Appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation in close proximity to development and to deliver/ assist in the delivery of actions within the Biodiversity Action Plan.
5. The provision of biodiversity improvements from all development, where feasible.
6. The provision of green roofs and living walls which contribute to biodiversity and help tackle climate change.
7. The use of sustainable drainage systems that promote ecological connectivity and natural habitats.

Local Plan Part 2

7.151 Policy DMEI 7 (Biodiversity Protection and Enhancement) states that:

- (a) The design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement.
- (b) If development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.
- (c) All development alongside, or that benefits from a frontage on to a main river or the Grand Union Canal will be expected to contribute to additional biodiversity improvements.
- (d) Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated for, will normally be refused.

Compliance with Policy

7.152 The scale of the proposed development would not meet the thresholds for the requirement of an Environmental Statement however to accord with paragraphs 170 and 174 in the revised NPPF, London Plan Policy 7.19, and Local Planning Policies EM7 and DMEI 7, a Preliminary Ecological Appraisal and Preliminary Roost Assessment Survey has been carried out. Within this supporting document, it states that the site itself is no subject to any statutory or non-statutory designation and there are none close by. The assessment concluded that there were no negligible habitat values,

making one recommendation suggesting if in the unlikely event hedgehogs are found, mitigation measures should be put in place to diminish potential harm.

8 CONCLUSION

- 8.1 Planning decisions on applications are made by assessing how proposals accord with the development plan and material considerations. This planning supporting statement has assessed the proposals for the demolition of the existing Block B (including basement plant room, adjacent canopies and water tower) and the construction of a new two-storey school building positioned on the footprint of the existing Block B.
- 8.2 The application forms Phase 2 of the wider Queensmead School redevelopment. The planning applications of Phase 1 of the proposed development, which comprises the enabling works which includes the erection of on-site temporary classrooms and a new permanent standalone plant room, is currently being determined by the London Borough of Hillingdon.
- 8.3 In its current configuration, the dilapidated school building is not sufficient to existing and long-term requirements of the school. The provision of a new teaching block is the only viable alternative to ensure the educational needs of existing and future pupils are met. Once complete, the proposed new school building will have a more efficient layout; improving current school facilities and enhancing the education and skills provision in the area.
- 8.4 The proposal involves the loss of a non-designated heritage asset. The loss of this Locally Listed Building is considered to result in a minor heritage impact, the new proposed build will incorporate many design aspects particular to the school and its architects. The design of the block is focused on delivering high quality teaching spaces and has therefore taken an education first approach. The new and increased facilities will also be of great public benefit to the students of the school, which will outweigh the minor heritage impact.
- 8.5 The proposed works seek to improve the operation of the school at its current capacity, and thus, the redevelopment will not lead to an increase in overall pupil or staff numbers.
- 8.6 Technical planning policy matters have been considered throughout this Statement and through this assessment, and specialist reports, they together demonstrate that the impact of the development on the surrounding area will be negligible and that improvements to the operation of the school site and in the quality of the school building itself will have an overwhelmingly positive impact on both the school and surrounding area
- 8.7 Overall, the proposed development accords with the development plan and is supported by planning policy at all levels. No material considerations or associated planning harm has been identified that should result in the proposal not being supported, as a result, it is considered that the proposal to install a new plant room should be supported by the Council.

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