

**London Borough of Hillingdon**

**Application for Full Planning Permission: 'Internal Alterations and Change of Use of Former Residential Building Block (Use Class C2) to a Teaching Building (Use Class F1), Two-Storey Extension to Provide Additional Teaching Space (Use Class F1), Construction of a Multi-Use Games Area, Revised Vehicular Access, Landscaping, Car and Cycle Parking, and Associated Works'**

**Land at The Harefield Academy, Hillingdon, OB9 6ET**

**Planning Statement – May 2022**

**Turnberry**

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# 1 INTRODUCTION

## 1.1 Background

1.1.1 This Planning Statement has been prepared by Turnberry Planning Limited on behalf of London Borough of Hillingdon ('LBH') ('the Applicant') and supports a Full Planning application relating to LBH ('the Local Planning Authority' [LPA]) as follows:

'Internal Alterations to and Change of Use of Former Residential Boarding Block (Use Class C2) to a Teaching Building (Use Class F1), Two-Storey Extension to the Building to Provide Additional Teaching Space (Use Class F1), Construction of a Multi-Use Games Area, Revised Vehicular Access, Landscaping, Car and Cycle Parking, and Associated Works'.

1.1.2 As shown in **Figure 1.1** the application site (with a site area of 1.34ha) is bounded by Northwood Road to the south, the Harefield Academy car park to the west and the remaining school site to the east north.



Figure 1.1 – Aerial Photograph of Site

1.1.3 The applicant is proposing to repurpose the existing unused boarding block at The Harefield Academy to create a new special needs school (extension of Meadow High School in Uxbridge) – Change of Use from C2 to F1. As part of the architectural brief, the school requires additional specialist teaching space which cannot be accommodated within the footprint of the existing building. Therefore, a two-storey extension is proposed

on the south-eastern side of the boarding block (Use Class F1). A new Multi-Use Games Area ('MUGA') and new vehicular access directly from Northwood Road will be provided.

1.1.4 The Design and Access Statement submitted with this application provides further information on the design rationale.

1.1.5 The planning application comprises of this Planning Statement and the following documents:

- Completed planning application form
- The following planning drawings:

Document	Drawing Reference
Existing Location Plan	(EX) 001 Rev D
Proposed Location Plan	(GA) 001 Rev E
Existing Site Plan	(EX) 005 Rev D
Proposed Site Plan	(GA) 005 Rev C
Demolition Site Plan	(DM) 005 Rev B
Ground Floor Plan	(DM) 100 Rev D
First Floor Plan	(DM) 110 Rev D
Second Floor Plan	(DM) 120 Rev D
Roof Plan	(DM) 130 Rev B
Existing Ground Floor Plan	(EX) 100 Rev D
Existing First Floor Plan	(EX) 110 Rev D
Existing Second Floor Plan	(EX) 120 Rev D
Existing Roof Plan	(EX) 130 Rev D
Existing Sections	(EX) 300 Rev C
Existing Northeast and Southeast Elevations	(EX) 400 Rev C
Existing Southwest and northwest Elevations	(EX) 410 Rev C
Construction Access	(GA) 002
Proposed Ground Floor Plan	(GA) 100 Rev E
Proposed First Floor Plan	(GA) 110 Rev E
Proposed Second Floor Plan	(GA) 120 Rev E
Proposed Roof Plan	(GA) 130 Rev E
Proposed Long Section	(GA) 300 Rev B
Proposed Northeast and Southwest Elevations	(GA) 400 Rev B
Proposed Southwest and northwest Elevations	(GA) 410
Landscape Strategy	220506 1468-HFD-HED-XX-XX-RP-L-0001

Landscape Plan	1468-HFD-HED-ZZ-XX-DR-L-1000 Rev A01
Hard Landscape Pallette	1468-HFD-HED-ZZ-XX-DR-L-1001 Rev A01
Soft Landscape Pallette	1468-HFD-HED-ZZ-XX-DR-L-1002 Rev A01
Tree Survey - Retention and Removal Plan	1468-HFD-HED-ZZ-XX-DR-L-1003 Rev A01
Green Space Comparison	1468-HFD-HED-ZZ-XX-DR-L-1004 Rev A01
Planting Scheme	1468-HFD-HED-ZZ-XX-DR-3000 Rev A01
Drainage Strategy	500 Rev P02
Proposed Catchment Plan	501 Rev P02

- Covering Letter
- Design and Access Statement – Will also include following elements:
  - Initial External Lighting Plan
  - Daylight Assessment
  - Accessibility Statement
  - Materials Details
  - Details of plant and ventilation
- Noise Assessment (Sharps Redmore)
- Transport Statement (Robert West) – Will also include following elements:
  - Existing and proposed car parking survey
  - Swept Path Analysis
  - Refuse Management Plan
  - Delivery and Servicing Strategy
- Travel Plan
- Outline Construction Logistics Plan
- Preliminary Ecological Appraisal (Maydencroft)
- Fire Statement (Hoare Lee)
- Building Sustainability and Energy Report (Edward Pearce)
  - Community Heating Borchure
  - ASHP Databook
- Flood Risk Assessment and Drainage Strategy (MHA Structural Design)
- Arboriculture Assessment (Trevor Heaps)

1.1.6 This planning application is accompanied by the relevant planning fee in the application form for the payment of the sum of **£4,652.20** (inclusive of portal service charge).

1.1.7 This Planning Statement provides further information on the proposed development and is structured as follows:

- Section 2 sets out the project background to include information on the applicant, description of the application site as well as relevant planning history.
- Section 3 outlines the proposed development relating to the site at Harefield Academy.
- Section 4 covers relevant national planning policies and guidance.
- Section 5 sets out the relevant development plan policies.
- Section 6 provides an assessment of the key planning issues relating to the application proposals.
- Section 7 summarises the conclusions that can be drawn from this Statement.
- Appended to this Statement is pre-application feedback received by Hillingdon Council (Appendix 1), and a copy of an Appeal Decision relating to Green Belt policy (Appendix 2).

## **1.2 Pre-application advice**

### *Hillingdon Council*

1.2.1 Pre-application feedback has been received from Hillingdon Council (03 February 2022). A copy of the Meeting Minutes is provided at **Appendix 1**. The pre-application advice is considered helpful to the consultant team and has helped to shape the design of the development.

## 2 Project Background

### 2.1 The Applicant

2.2.1 The applicant for the proposed development is the London Borough of Hillingdon ('LBH'). LBH are the landowners of the site and are responsible for overseeing the expansion of Meadow High School at The Harefield Academy.

### 2.2 The Harefield Academy

2.2.2 The Harefield Academy is a secondary school and sixth form in Uxbridge and is located on the site of the former John Penrose School ('JPS'). The Academy opened in 2005 following the closure of the JPS earlier that year.

2.2.3 To the east of the main Academy school building is a former boarding block (Figure 2.1) with capacity for fifty bedspaces and integrated staff accommodation on three-storeys around a central internal atrium. The boarding block opened in 2011, however in 2019 Harefield Academy stated its wish to cease provision of the state boarding facility, effective from 31<sup>st</sup> July 2020. As such, since this time the boarding block has been unused. The school is significantly under capacity as of May 2022.

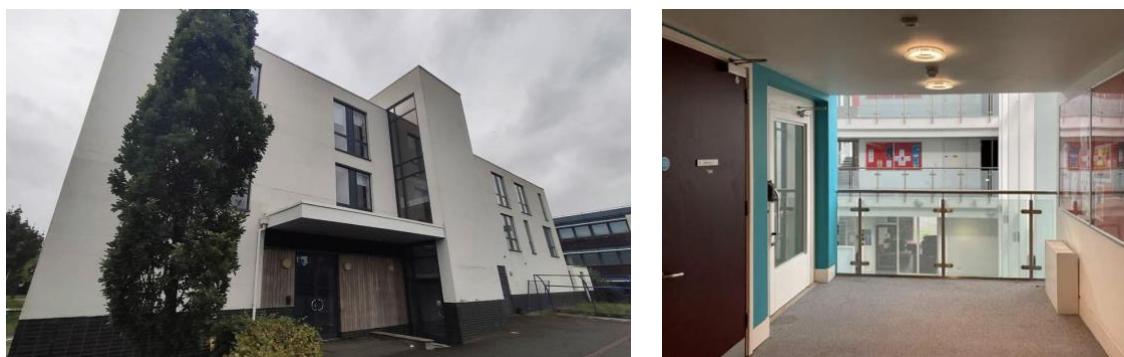


Figure 2.1 – Photos of external and internal of boarding block

### 2.3 Meadow High school

2.3.1 Meadow High School ('MHS') is a local authority-maintained community special school in Uxbridge. The school has a designation of Complex and Moderate Learning Difficulties (including Autistic Spectrum Conditions).

2.3.2 The school currently serves 257 pupils in school years 7-14 (pupil ages 11-19). Since opening, the pupil roll has continued to grow and has reached full capacity. It is in this context that this application has been prepared as Meadow High School are seeking in the long term to provide enhanced facilities to accommodate a growing demand in pupil places, which cannot be met by the existing school.

### *Learning Pathways*

2.3.3 Meadow High School has three Pathways for pupils in years 7-11 that have been designed to support children with Special Educational Needs in making successful onwards transitions. Pathway 1 pupils have complex learning difficulties and autism conditions and require the greatest level of support of the intake at MHS.

2.3.4 The new school at the site of Harefield Academy will accommodate Pathway 1 pupils currently taught at Meadow High School as well as providing capacity for additional school places.

2.3.5 **Table 2.1** below provides background to the pathways to success for pupils at Meadow High School in pathway 1.

**Table 2.1 – Learning Pathways at Meadow High School**

Year Group	Description
Year 7-11	Pathway 1 pupil Year Groups 7-11 are taught in tutor group based themed learning in key stage vertical groups. There are a maximum eight pupils per class, supported by one teaching and two teaching assistants.
Year 12-13	Pathway 1 pupils Year Groups 12-13 has key focus on developing life skills. Class sizes for this age group are up to a maximum of 16 pupils with one teacher and two higher teaching assistants and four teaching assistants.
Year 14	Year 14 has a similar focus on developing life skills but with an additional focus on transition. Class sizes are the same as above for Years 12-13.

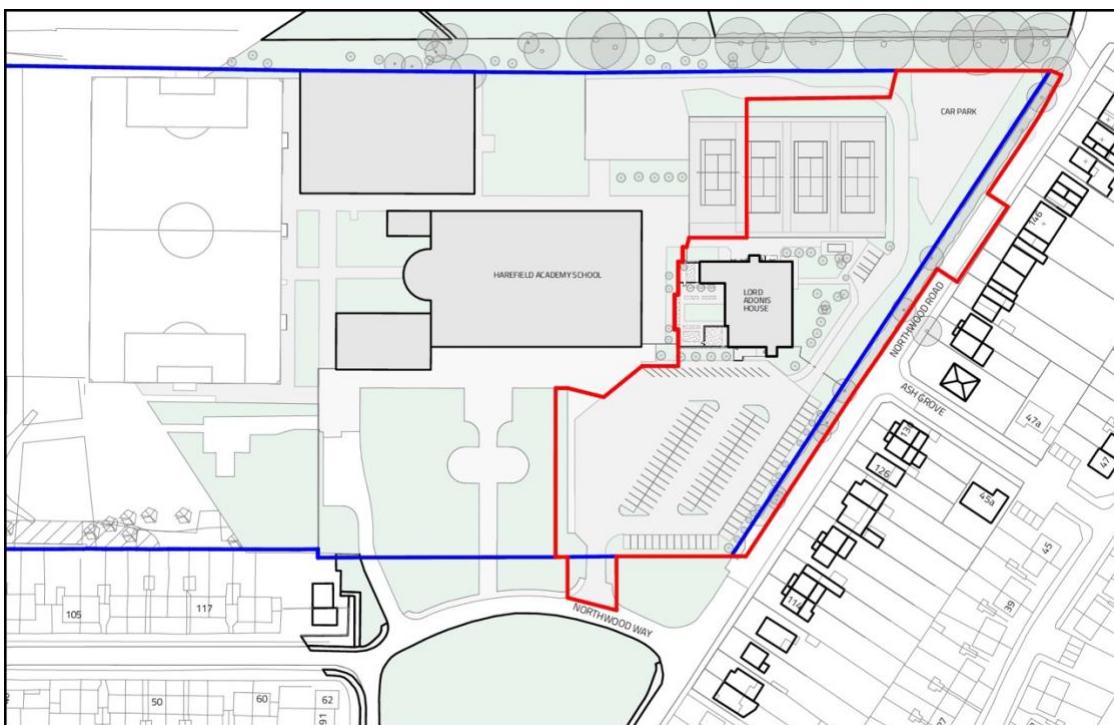
2.3.6 Pupils are supported as individuals to achieve their aspirations and potential to ensure a successful transition from their time at Meadow High School. The following are some of the typical expected outcomes after Pathway 1:

- Supported living with limited independence skills.
- Able to form and continue relationships as well as access the community safely with support.
- Full supported is expected with regards to money and literacy.

2.3.7 Following Pathway 1, the expected destination for Pathway 1 pupils is specialist 19-25 provision.

## 2.4 The Application Site

2.4.1 The site location of the application site with a site area of approximately 1.34ha is shown in **Figure 2.2** and comprises the south side of the Harefield Academy site. This lies on the edge of the developed area of Harefield, a village within the London Borough of Hillingdon and is located in the Green Belt. The Harefield Academy consists of the main school building, an unused boarding block, car park, service road, sports courts and gymnasiums, an indoor football pitch and outdoor sports provision extending out to the north-west of The Academy.



**Figure 2.2 – Location of Application Site**

2.4.2 Immediately south-east of the site are residential properties along the frontage of Northward Road and to the south-west beyond the school site are residential properties along Newdigate Road and Northwood Way. There are small areas of built development to the north of the site within the Green Belt, including a residential property immediately north-east of The Harefield Academy site.

2.4.3 The site is centred upon an unused building previously used as a boarding site for students of The Academy. The building comprises residential accommodation (principally a series of bedrooms and kitchens) arranged over three-storeys around a central atrium. The boarding block occupies a built footprint of 1762m<sup>2</sup> with an internal area of 1,613m<sup>2</sup> and backs onto the main school building of Harefield Academy. In addition, there is a walled court yard in the area between the boarding block and main school building with some landscaped features.



**Figure 2.3 – Photo of Southern Elevation of Existing Boarding Block**

- 2.4.4 The second area of the site is a series of four tennis courts/MUGA pitches north of the boarding building which are contained by fencing.
- 2.4.5 To the east of these courts is an area of hardstanding. This is a redundant space which currently comprises a series of storage containers. The scheme proposes to restore this area of the site to beneficial use. A temporary access road that was put in place during the construction of Harefield Academy separates these areas of the site. Please see **Figure 2.4** below.
- 2.4.6 Outside the boarding building entrance are accessible parking bays and south of the former boarding building is the main car park which serves the Academy school. An existing biomass boiler enclosure is located between the tennis courts and boarding block but has never been used by The Academy.
- 2.4.7 The site's perimeter is well landscaped, with mature oak trees and vegetation screening the site to the north in addition to a line of vegetation cover along the Northwood Road frontage to the east.



View of the area of hardstanding with storage containers



View from the existing access road looking towards the residential boarding building



View of the existing site entrance accessed via the main Academy car park



View from the northern boundary of the site looking towards the boarding building

**Figure 2.4 Existing Site Photographs**

2.4.8 The site's relationship with the existing Meadow High School site is also relevant to consider. Existing Pathway 1 pupils will relocate from Meadow High School to the new proposed expansion site at Northwood Way/The Harefield Academy. The remaining pupils will be new. Pathway 1 staff who currently work at the existing Meadow High School will relocate to The Harefield Academy site. Both schools will operate independently from the same site and as they are approximately eight miles apart.

2.4.9 Meadow High School will back fill pupil and staff numbers and will be subject to a small increase in overall pupil numbers. These proposals will be subject to a separate planning application.

## 2.5 Relevant Planning History

2.5.1 Relevant planning history of the application site is shown in **Table 2.2**.

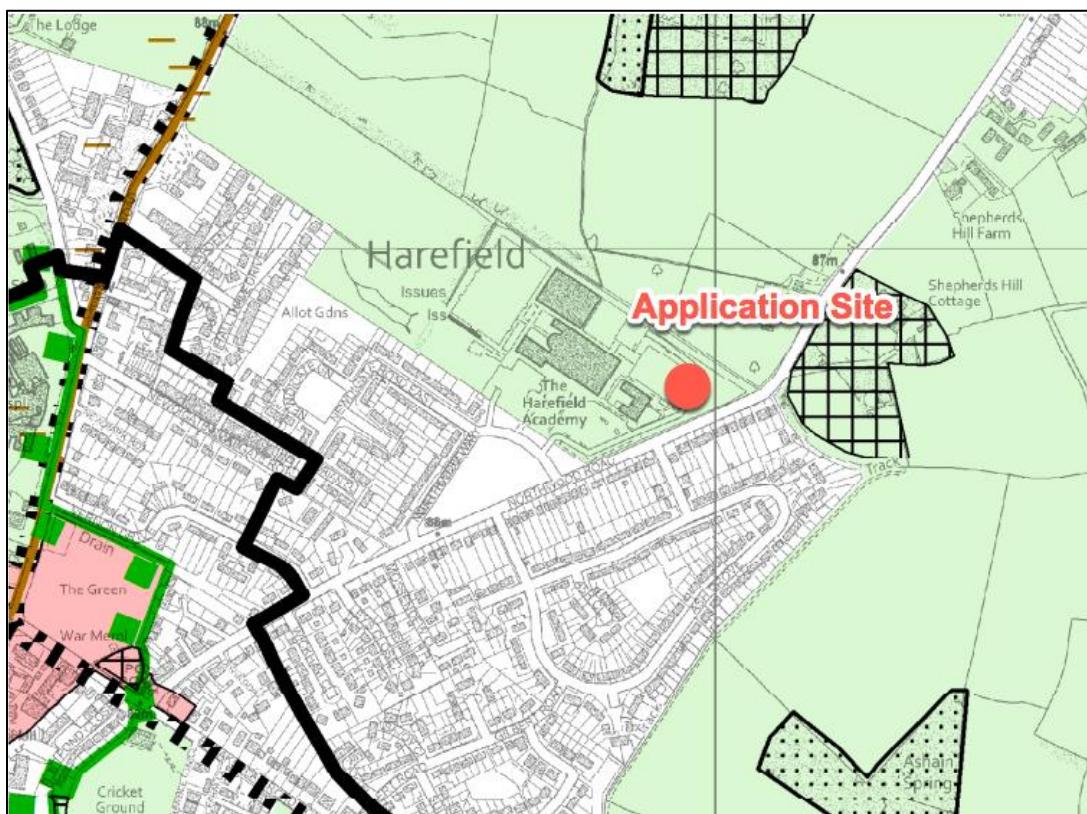
**Table 2.2 – Planning History**

LPA Ref.	Description of Development	Decision	Date of Decision
17709/APP/2004/19 14	Redevelopment of school, involving erection of new buildings and demolition of existing buildings to provide a new academy school for 1000 students. Provision of associated sports facilities, hard and soft play areas, ancillary creche, new access, replacement parking and landscaping	Approved	05 July 2005
17709/APP/2006/82 5	Redevelopment of school, involving erection of new buildings and demolition of existing buildings to provide a new academy school for 1000 students. Provision of associated sports facilities, hard and soft play areas, ancillary creche, new access, replacement parking and landscaping	Approved	16 June 2006
17709/APP/2006/26 97	Variation of conditions 6, 7, 9, 11, 13, 14, 15, 16, 19, 20 & 31 of planning permission ref:17709/APP/2006/825	Split Decision  Notice 1: Approved (variation of conditions 6, 7, 9, 11, 14, 15, 16, 19, 20 and 31)  Notice 2: Refuse (variation of conditions 28, 29 and 30)	13 November 2006
17709/APP/2009/62 4	Erection of a three-storey building to provide accommodation for 50 boarders and 4 staff with ancillary amenity space, landscaping, car parking and biomass boiler enclosure	Approved	18 September 2009

## 2.6 Planning Designations

2.6.1 In terms of relevant planning designations of The Harefield Academy site, it is recognised that the adopted Local Plan Part 2 Policies Map displays the entire site is designated as Green Belt land. There are no other designations known to affect the application site. **Figure 2.5** displays the location of the application site overlaid on the Council's Policies Map.

2.6.2 Whilst within the Green Belt the site is immediately adjacent to the village of Harefield. The proposal will fill an existing gap between the Academy and boarding building and the village dwellings along Northwood Road. An assessment of the development in the context of the Green Belt is provided in section 6.3 of this Planning Statement.



**Figure 2.5 – Hillingdon Local Plan Policies Map (Green indicates Green Belt)**

### 3 Proposed Development

3.1.1 This section provides details of the proposed development and sets out the need for the new school in this location.

#### 3.2 Need

3.2.1 There is a burgeoning need for the proposed scheme at a variety of spatial scales. This stems from a London-wide need for additional SEND school places through to a borough-wide need in Hillingdon, and a site-specific need for a new school to accommodate pupil places from Meadow High School.

##### *Policy Context*

3.2.2 The London Borough of Hillingdon commissioned its Strategic Infrastructure Plan ('SIP') in 2017 as part of the evidence base in support of its new Local Plan. The strategy covers the period 2017-2022 and thus needs to be updated, however as part of the evidence base to the Local Plan it is relevant to review as part of an assessment of need.

3.2.3 The SIP acknowledges the need to provide an additional 130 Special School, Specialist Resource Provision and Pupil Referral Unit places by 2020/21. This need is proposed to be met by a combination of school expansions to existing schools as well as through the delivery of new free schools.

3.2.4 At a regional scale the London Plan is cognisant of the growing need for special school places across London. The Plan observes at its paragraph 5.3.6 that "*there is a need for an increase in Special Education Needs and Disability (SEND) provision in London and it is important that these places are planned for. Some of this provision will be within mainstream schools and some within specialist schools*".

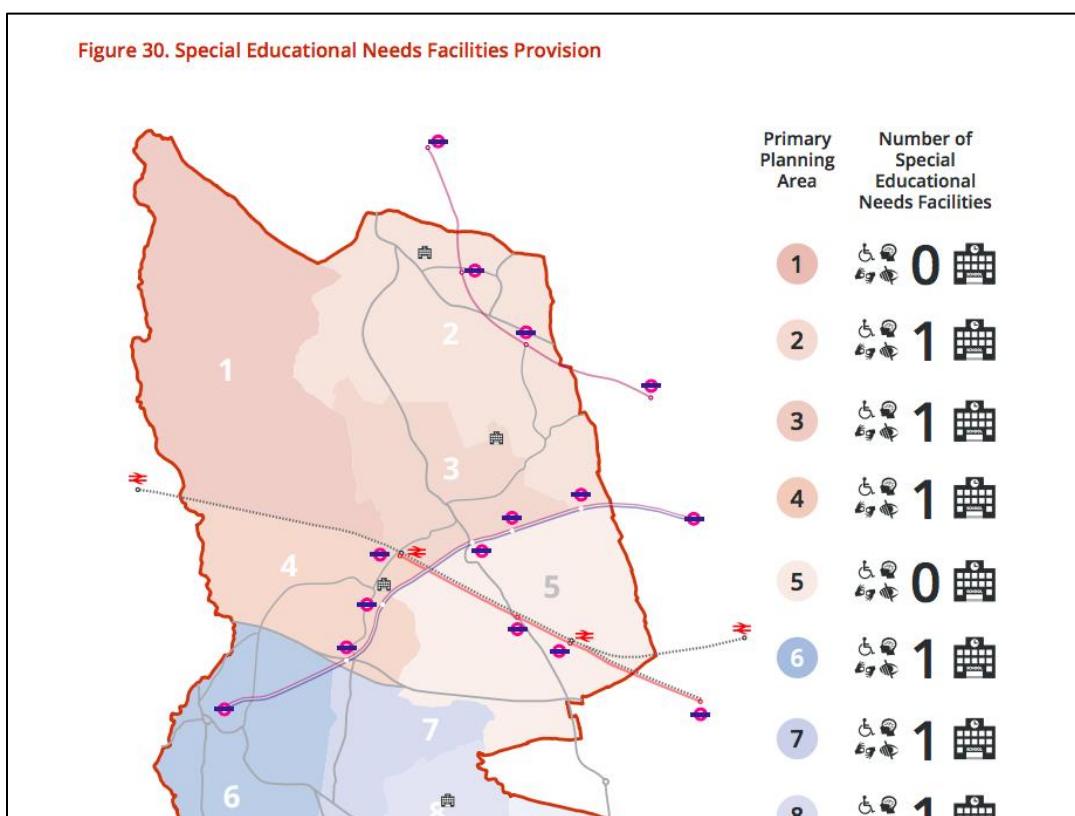
3.2.5 In addition, the latest London Assembly SEND Report: 'Transforming the lives of children and young people with special education needs and disabilities in London' (2018) notes that over 200,000 children and young people were assessed as having some level of special need in London (or around 14% of young Londoners) and that of this total 41,000 children had either a special education statement or an Education, Health and Care Plan (EHCP).

3.2.6 The report notes that based on the number of children assessed as needing an EHCP there will be a need for London to provide support for 2,340 more young people of secondary school age over the next five years. However, this figure assumes that the rate will remain the same whereas projections indicate an increase in children requiring an EHCP.

### *Hillingdon Special Schools*

3.2.7 There are nine special schools in the London Borough of Hillingdon. Of this total, six schools are local authority maintained and a further two special schools are independent or non-maintained. Each school provides support to children with special educational needs and disabilities in different ways.

3.2.8 There are 14 Primary Planning Areas ('PPA') in Hillingdon. The site of the proposed Special School in Harefield is located within PPA 1 where there are no Special Educational Needs facilities as shown in Figure 30 to the Council's Strategic Infrastructure Plan ('SIP') (**Figure 3.1** below).



**Figure 3.1 – Special Educational Needs Facilities Provision by Pupil Planning Area (2017)**

### *Pupil Place Planning*

3.2.9 LBH issue Quarterly School Place Planning Updates in order to provide regular updates on school places planning. The latest January 2022 quarterly report identified that special schools across the borough have reached full capacity, with higher rolls and a higher proportion of Hillingdon residents than before.

3.2.10 **Table 3.1** below displays the total roll of all special schools in 2020 which reached 955, an 8% rise of 72 from the previous year.

**Table 3.1 – Total Pupil Rolls Across Special Schools in LBH in 2020 by Year Group**

Year Group	N2	R	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Total
All schools	7	5	27	35	60	67	68	78	79	86	79	69	83	71	64	42	955

3.2.11 Due to the changes in the requirements for SEND provision for local authorities including the increase in the upper age limits for support, the demand for additional special school places has risen significantly. In Hillingdon, the result has been a 90% rise in the number of families requiring ECHPs over the period 2014/15 to 2020/21.

3.2.12 Pupil place data therefore provides a clear indication of the borough-wide need for additional provision to meet SEND demand. This need is projected to continue to increase with birth rates in Hillingdon above the national average and in the context of a significant number of new residential developments across the Borough.

*Site-Specific Need*

3.2.13 The need for the proposed development stems in large part from the need to accommodate pupil places from Meadow High School that would otherwise be lost following the demolition of the existing modular units on site (82 places).

3.2.14 The existing modular classroom units on the site of Meadow High School have reached the end of their useful life and due to their condition are unsuitable to support pupils with limited mobility. These units were only intended for temporary use in the background of a longer-term development of a new teaching building.

3.2.15 The temporary permission for the modular buildings (ref: 3348/APP/2020/899) requires their removal at a specified date. The proposed new school at The Harefield Academy site is a critical component of the wider objective to replace the modular units and provide additional school places for which there is an urgent need.

3.2.16 Meadow High School is the only secondary school in the Hillingdon Local Authority area that provides support to children with Moderate Learning Disability (MLD) and Autism Spectrum Disorder (ASD). The school, as with all other SEND schools across the Borough, is operating at full capacity with pupil rolls increasing year on year. The existing pupil roll at MHS is 255 as displayed in **Table 3.2** which is the highest of any special school in the Borough. The school is now at full capacity and can no longer accommodate an increase in pupil numbers despite growing demand for places.

**Table 3.2 – Meadow High School Pupil Roll Totals**

Year Group	7	8	9	10	11	12	13	14	Total
MHS Roll Totals	35	36	21	29	33	35	28	28	<b>255</b>

*Summary of Need*

3.2.17 This section has demonstrated the clear need for the proposed development which carries significant weight in favour of the proposals. Providing additional SEND school spaces will reduce the strain on current special needs provision in the Borough, whilst aiding the development of an existing facility to provide a high-quality refurbishment.

### **3.3 Logic in Developing The Harefield Academy Site**

3.3.1 There are a range of factors that point to the site at The Harefield Academy as the logical location to develop a satellite extension for Meadow High School. These are expanded upon below:

1) Evidence of Capacity at The Harefield Academy

3.3.2 The latest Quarterly Pupil Place Update notes that The Harefield Academy has a particularly low pupil roll with a low demand for places from Hillingdon residents. The pupil roll at The Harefield Academy (328) is the lowest of any secondary school in Hillingdon and is significantly below the average roll for all secondary schools (1,163). Demand for places at the school mainly emanates from the semi-rural Harefield village rather than from Hillingdon Borough as a whole.

3.3.3 The existing residential boarding block at the Harefield Academy site opened in 2012 and has capacity for 50 places. However, the block is not in-use as a boarding facility and is surplus to the Academy's requirements. The Harefield Academy site is therefore a logical location to meet the demand for additional SEND provision in the form of a new school.

2) Meeting the Needs of Hillingdon Residents and Reducing the use of Out of Borough Provision

3.3.4 The lack of capacity for in-borough SEND provision in Hillingdon has led to the increasing use of out of Borough and non-maintained special schools. Meadow High School is the only SEND school for secondary school pupils with MLD and ASD. The school is operating at full capacity thus it is imperative to provide space for additional provision in order to meet demand for pupil places.

3) The Suitability of the Site to accommodate a SEND School

3.3.5 The existing boarding building is unused by the Academy. The proposed development will make full use of the site to provide classroom and teaching spaces following internal alterations to the building to bring the internal spaces in line with DfE Area Guidelines for SEND and alternative provision (BB104). The new school will make use of a previously developed site within the Borough as opposed to a greenfield site.

3.3.6 In terms of external areas of the site the existing sports pitches can be readily subdivided to provide dedicated PE area for pupils at the new school. The reconfiguration of the sports pitches which are underused by the Academy will retain the necessary facilities for their use whilst providing learning and physical activity benefits for pupils at the new school.

## 3.4 Proposed Development

### *Overview*

3.4.1 The application proposal seeks to transfer pupils currently taught at Meadow High School to an unused residential boarding block at the site of the Harefield Academy to form a new school unit. The intention is for the building block and the immediate surrounding area to be leased by the London Borough of Hillingdon to Meadow High School.

3.4.2 This application is submitted to establish a new school facility on the proposed site. Once the development has been built out, the intention is that Pathway 1 pupils will be relocated from Meadow High School to the new school. This will provide the additional required capacity for the school to allow for the deteriorating modular units which have come to the end of their useful life to be demolished and the new replacement block constructed. It is estimated that the overall capacity of the Harefield Academy and Meadow High School sites combined will be 355 places, but this will be dependent on the exact needs of individual pupils and class sizes.

Proposed works to the building block include internal adaptations and a two-storey extension to the block to provide the required classrooms and facilities for the new school. Additional works include the formation of external play spaces, cycle and car parking spaces, the creation of a new access into the site from Northwood Road, as well as revised landscaping.

3.4.3 The proposed development is seeking full planning permission for:

'Internal Alterations and Change of Use of Former Residential Building Block (Use Class C2) to a Teaching Building (Use Class F1), Two-Storey Extension to Provide a Teaching Building (Use Class F1), Construction of a Multi-Use Games Area, Revised Vehicular Access, Landscaping, Car and Cycle Parking, and Associated

Works'

3.4.4 The quantum of floorspace of the proposed development is summarised in **Table 3.3**.

**Table 3.3 – Existing and Proposed Floorspace Comparison**

	<b>Gross External Area ('GEA') (m<sup>2</sup>)</b>		<b>Gross Internal Area ('GIA') (m<sup>2</sup>)</b>	
	Existing	Proposed	Existing	Proposed
Former Boarding Building	1,762	1762	1,613	1,627 (including disabled access lift)
Extension	0	688	0	622
<b>Total</b>	<b>1,762</b>	<b>2,450</b>	<b>1,613</b>	<b>2,249</b>

*Change of Use and Internal Alterations to the Boarding Block*

3.4.5 The lawful use of the residential boarding block is C2, therefore this application partly seeks a Change of Use of the existing premises from C2 to a building for education use (F1(a) within the wider Use Class F1 (Leisure and non-residential institutions)).

3.4.6 Internal adaptations to the building block will be required to ensure that the building is suitable for use as a Special School in line with national guidance on space requirements for SEND. Larger spaces will need to be formed to create classrooms and common rooms. New openings will be formed from the internal areas to allow pupils to access the proposed play areas.

3.4.7 The existing lift servicing the upper floors does not meet the standards required for the proposed school due to the needs of Pathway 1 pupils. A new lift will therefore be installed to improve vertical circulation and act as an evacuation lift in the event of an emergency.

Two-storey Extension

3.4.8 A two-storey extension to the front east of the building is proposed which will house dedicated classroom and breakout spaces. The arrangement of these learning spaces has been an important consideration in the design evolution and further details of the teaching areas can be observed in the Design and Access Statement (page 14).

3.4.9 The extension forms an entrance courtyard with the new building to demarcate the pupil entrance and visitor entrance and create security lines. The extended building opens up to the adjacent MUGA space, designed to enhance the overall learning environment for SEND pupils.

3.4.10 The two-storey height proposed is one-storey lower than the adjacent 6<sup>th</sup> form block of the Academy and its form will be stepped. The primary mass of the extension, however, is at the junction with Ash Grove, between dwellings.

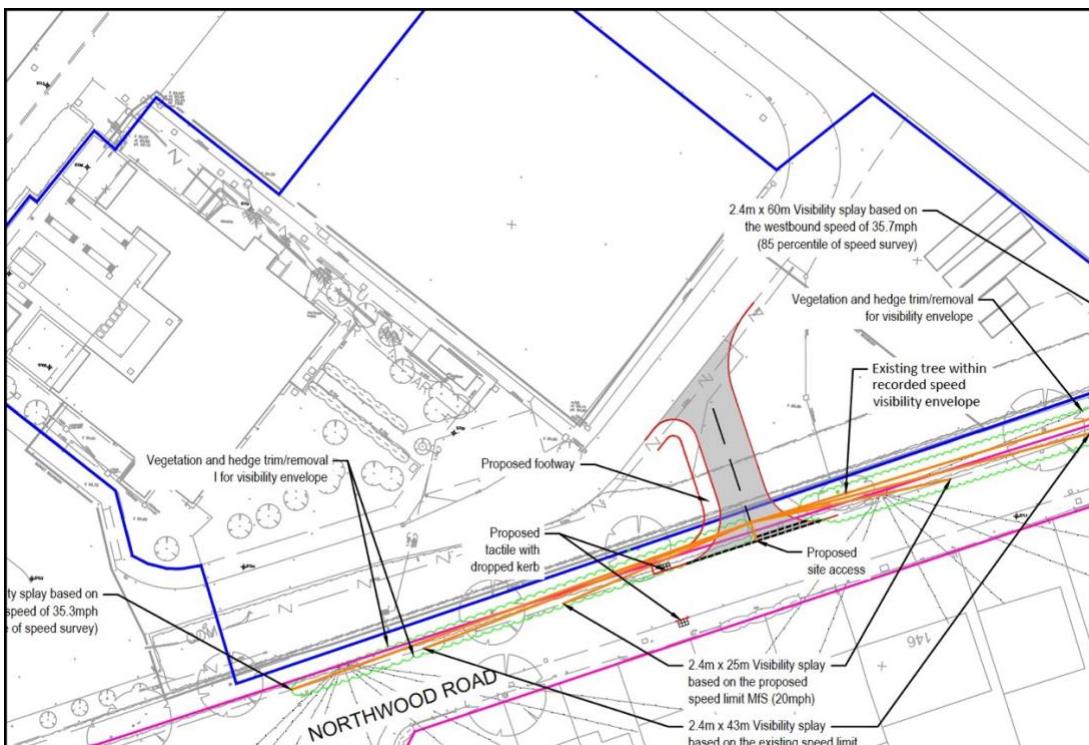
3.4.11 The extension will be framed in cross-laminated timber, and a green sedum/wildflower roof is proposed to provide low carbon and biodiversity benefits.

#### External Areas

3.4.12 A key component of the proposed development is the development of a Multi-Use Games Area ('MUGA'). This provides for a large flexible space, with multi ability play equipment providing inclusive play opportunities. In addition, an area of informal car parking in the north-eastern corner of the site is proposed to be retained and enhanced. The part of the site will also contain areas of dedicated landscaping.

#### New Road Access

3.4.13 A new pedestrian, cyclist and vehicular access is proposed from Northwood Road (**Figure 3.2**) at the location of the junction previously used for the construction of The Harefield Academy.



**Figure 3.2 – Proposed Access**

3.4.14 This is proposed to be the main site access point to the new school and will differentiate it from the existing Academy. The site access proposed is to form a priority junction accommodating two-way vehicle movements. A 2m wide footway will be provided at the eastern side of the access providing a connection to a secure pedestrian gate within the site. A dropped kerb crossing point is proposed providing access from the southern footway on Northwood Road to the northern footway at the site access. The proposed site access will also provide direct access to the staff and visitor car park.



Figure 3.3 – Proposed Car Parking Arrangement

3.4.15 Most students at the new school will arrive via a special minibus service operated by the Council, which requires a direct drop-off and pick-up service immediately outside of the entrance doors of the school. Therefore, the new access will allow the vehicles to drive into the site through the Academy car park and exit straight onto Northwood Road. This will enable the provision of a secure, enclosed entrance feature for the school to meet SEND school standards.

#### Redrawing Security Lines

3.1.1 The existing vehicular access from Northwood Way via The Harefield Academy car park will form a secondary vehicular access to the school. This access will be formed during school drop-off and collection. Within the site for the new school, there will be a dedicated drop-off zone with two vehicular and pedestrian gates that create a secure environment. The vehicular gates will be manually controlled by staff and the pedestrian gates will be automatically controlled via an intercom system.

3.1.2 Currently, service vehicles for the existing academy enter via the car park and run along the southern boundary of the boarding block, around to the eastern boundary of the site and up to the main refuse and delivery locations. Under the new plans, these vehicles would share the new Northwood Road access to prevent the existing gate/fence line at the boundary of the car park and service road from needing to be used during school hours, maintaining the secure line at the entrance of the new school.

## 4. National Planning Policy and Guidance

### 4.1 Introduction

4.1.1 This section provides an overview of national planning policy that is considered relevant to the proposed development. These are:

- National Planning Policy Framework (NPPF) (Updated July 2021)
- Planning Practice Guidance (PPG)

### 4.2 Presumption in favour of sustainable development

4.2.1 Paragraph 11 of the NPPF refers to the 'presumption in favour of sustainable development, whereby for decision taking this 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: the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or 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.

4.2.2 The proposed development is considered to accord with the development plan, and this is demonstrated in **Section 5** of this document.

### 4.3 Design and Visual Impact

4.3.1 Paragraph 130 of the NPPF stipulates that planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) 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 increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) 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

- f) 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.

4.3.2 Paragraph 134 of the NPPF states permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. It further recognises that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

#### **4.4 Achieving Well-Designed places**

4.4.1 Paragraph 130 of the NPPF requires planning policies and decisions to ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) 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 increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) 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
- f) 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.

#### **4.5 Social and Education**

4.5.1 Paragraph 92 looks to ensure that planning decisions achieve healthy, inclusive and safe places that promote social interaction, are safe and accessible, and enable and support healthy lifestyles.

4.5.2 Paragraph 95 states that local authorities should give “great weight” to the need to create, expand or alter schools through the preparation of plans and decisions on applications. This paragraph further states the need to promote access to educational facilities that meet modern demands.

## **4.6 Sports Provision**

4.6.1 Paragraph 99 provides that existing sports land should not be built on unless:

- a) An assessment has been undertaken which has clearly shown the land to be surplus to requirements; or
- b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location; or
- c) The development is for an alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

## **4.7 Transport**

4.7.1 Paragraph 110 states that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and
- c) 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.

4.7.2 Paragraph 111 stipulates 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.

4.7.3 Paragraph 113 states that all developments that will generate significant amounts of movement 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.

## **4.8 Flooding**

4.8.1 Paragraph 159 of the NPPF stipulates that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. It is notable that given the proposed development is not on Flood Zones 2 or 3, the need to demonstrate the Sequential Test and/or Exception Test do not apply.

4.8.2 Paragraph 167 states that when determining planning applications, LPAs should ensure flood risk is not increased elsewhere and that within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location. In addition, the NPPF as well as paragraph 001 (Ref. ID:7-001-20140306) of the PPG states that development should be appropriately flood resilient and resistant, including safe access and escape routes where required and that any residual risk can be safely managed, including by emergency planning and it

gives priority to the use of sustainable drainage systems.

#### **4.9 Pollution (Noise, Air Quality, Artificial Lighting)**

4.9.1 Paragraph 185 of the NPPF states that planning policies and decisions should ensure that new development is appropriate for its location taking into account the likely effects (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.

4.9.2 Furthermore, paragraph 188 states that the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.

#### **4.10 Climate Change**

4.10.1 Paragraph 152 of the NPPF states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. 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.

4.10.2 Paragraph 157 states that in determining planning applications, local planning authorities should expect new development to: a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

#### **4.11 Green Belts**

4.11.1 Chapter 13 of the NPPF sets out national planning policies which seek to protect Green Belt land. Paragraph 138 sets out the five purposes served by the Green Belt:

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

- 4.11.2 For proposals affecting the Green Belt paragraph 147 establishes that inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. These will not exist unless potential harm to the Green Belt by reason of inappropriateness and, and any other harm from the proposal, is clearly outweighed by other considerations.
- 4.11.3 Paragraph 149 sets out a series of exceptions in which the construction of new buildings in the Green Belt will not be seen as inappropriate, and thus very special circumstances are not required to be demonstrated.

## **5 Development Plan Policy**

### **5.1 Introduction**

5.1.1 This Section provides a review of the development plan policies considered to be relevant to the proposed development. It also considers other relevant related documents and Supplementary Planning Guidance ('SPGs') as follows:

***London Level:***

- Optimising Site Capacity: A Design Led Approach
- Play and Informal Recreation SPG
- Fire Safety LPG
- Social Infrastructure SPG
- Urban Greening Factor LPG
- Be Seen Energy Monitoring LPG
- Energy Planning Guidance

***Local Level:***

- Accessible Hillingdon SPD
- Planning Obligations SPD

### **5.2 The Development Plan Framework**

5.2.1 Although the Government's NPPF and PPG are an important material consideration to be taken into account in determining planning applications, the planning Acts confirm that the 'Statutory Development Plan' should be the starting point for such decisions. In this respect, Section 38(6) of the 'Planning and Compulsory Purchase Act 2004' (the Act) states:

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

5.2.2 Therefore, the statutory development plan for the application site currently comprises:

- Local Plan Part 1: Strategic Policies (adopted November 2012)
- Local Plan Part 2: Development Management Policies, Site Allocations and Designations, Policies Map (adopted January 2020)

- London Plan 2021 (adopted March 2021)

### 5.3 Local Plan Part 1: Strategic Policies

5.3.1 The Local Plan Part 1 is supported by a series of **Strategic Objectives** to deliver the vision for the Local Plan and support the plan's core policies. The following Strategic Objectives are considered particularly relevant to the proposals:

5.3.2 S06 looks to promote social inclusion through a number of means including access to education and recreational space particularly for residents living in identified areas of need.

5.3.3 S08 seeks to protect and enhance biodiversity to support changes to adapt to climate change and related to this S011 which looks to address the impacts of climate change.

5.3.4 S09 encourages healthier lifestyles through access to sports and recreation facilities.

5.3.5 S018 looks to improve access to local services and facilities including educational.

5.3.6 In addition, the following **Core Policies** are relevant to consider:

5.3.7 Policy NPPF1 establishes a presumption in favour of sustainable development that mirrors that set out in the National Planning Policy Framework.

5.3.8 Policy BE1 (Built environment) seeks to protect the quality of the built environment. New development should achieve a high quality design in all new buildings, alterations and extensions and public realm that enhances local distinctiveness and contributes to community cohesion and sense of place; be designed to be appropriate to the identity of Hillingdon's townscape, landscapes and views; improve areas of poorer environmental quality; incorporate a clear network of routes that are easy to understand; improve the quality of public realm; create safe and secure environments; and not result in inappropriate development of gardens and green spaces.

5.3.9 Policy EM1 (Climate change adaptation and mitigation) prioritises climate change mitigation through a variety of means including promoting a modal shift away from car use and ensuring development meets the highest possible design standards.

5.3.10 Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains) sets out that proposals for development in the green Belt will be assessed against the national policy tests, including very special circumstances.

5.3.11 Policy EM5 (Sport and leisure) seeks to safeguard, enhance and extend the network of sport and leisure spaces that meets local community needs and facilitates active lifestyles. The policy establishes a presumption against the net loss of active sport and leisure facilities in the Borough, but also acknowledges the need to adopt a flexible approach to sports facility provision recognising changing demographics in the

population and trends in sports participation.

- 5.3.12 Policy EM6 (Flood risk management) directs new development to the lowest flood risk zones first, consistent with paragraph 159 of the NPPF. All development should use Sustainable Urban Drainage Systems (SuDS) unless where it can be demonstrated that this is unviable.
- 5.3.13 Policy EM7 (Biodiversity and geological conservation) encourages the provision of biodiversity improvements from all developments where this is feasible. The application site is not part of a Site of Importance for Nature Conservation (SINC) which the policy seeks to protect.
- 5.3.14 Policy EM8 (Land, water, air and noise) stipulates that new development should not cause deterioration in local air quality levels and ensure the protection of existing and new sensitive receptors. Noise impacts should be adequately controlled and mitigated. Proposals on contaminated land will require mitigation. All new development should incorporate water efficiency measures.
- 5.3.15 Policy EM11 (Sustainable waste management) aims to reduce the amount of waste produced in the Borough. The policy requires all new development to address waste management. The re-use of materials and recycling is encouraged.
- 5.3.16 Policy T1 (Accessible local destinations) steers development to the most appropriate locations to reduce their impacts on the transport network. Sustainable transport modes are specifically encouraged.
- 5.3.17 Policy CI1 (Community infrastructure provision) strives to ensure that community and social infrastructure is provided that caters for the needs of existing community and future populations. This is to be achieved by a number of measures, which includes supporting extensions to existing schools.
- 5.3.18 Policy CI2 (Leisure and Recreation) states that the Council will, in partnership with other bodies, seek to secure good quality, well maintained leisure and recreation facilities to address identified deficiencies and meet the needs of local communities, particularly deprived groups.

## **5.4 Local Plan Part 2: Development Management Policies, Site Allocations and Designations, Policies Map**

- 5.4.1 The application site is located within designated Green Belt land on the adopted Local Plan Proposals Map. The site is not noted to be allocated for specific use within the Local Plan 'Site Allocations and Designations' ('SAD') document.
- 5.4.2 The following Development Management policies are considered relevant to the proposed development:

5.4.3 Policy DMHB 11 (Design of new development) provides design considerations further to those noted in Strategic Objective SO2 in the Local Plan Part 1.

- a) All development is required to be designed to the highest standards and incorporate principles of good design including harmonising with local context; ensuring the use of high-quality materials and finishes and maximises the sustainability of internal layout and design; protecting features of positive value within and adjacent the site; and landscape and tree planting.
- b) Development proposals should not adversely impact on amenity, daylight and sunlight of adjacent properties and open space.
- c) Design will be required to safeguard the redevelopment of adjoining sites with development potential, and for major proposals master plans and design codes are expected to be prepared and agreed with the Council
- d) Sufficient provision for well-designed internal and external storage space for waste with suitable access for collection

5.4.4 Policy DMHB 12 (Streets and public realm) requires developments to integrate with surrounding areas to produce a coordinated and legible public realm. The policy sets out specific factors that should be considered, including suitable landscape treatment and improving legibility and promoting wayfinding between the development and local amenities.

5.4.5 Policy DMHB 14 (Trees and landscaping) expects landscape, trees and other natural features of merit to be retained and for proposals to provide a landscape scheme appropriate to the character of the area. Where proposals would affect existing trees an accurate tree survey will be required to show how the trees will be protected. Where trees are removed, replanting on-site or contributions to offsite provision must be provided.

5.4.6 Policy DMHB 15 (Planning for safer places) requires all developments to ensure safe and attractive public and private spaces. Inclusive environments should be created whilst improving safety and security by providing entrances in visible locations; maximising natural surveillance, ensuring the adequate defensible space provision; creating clear distinctions between public and private spaces; appropriate lighting and CCTV.

5.4.7 Policy DMHB 19 (Play space) sets out that the council will resist the loss of existing play spaces unless a replacement space of equivalent size and functionality is provided or where not possible in exceptional circumstances where there are overriding planning merits; and the spaces can be demonstrated robustly to be no longer required with no shortfall in play provision in the local area.

5.4.8 Policy DMCI 1 (Removal of existing community facilities) stipulates that where proposals result in the loss of an existing community facility they will be permitted if the specific use is no longer required on site (with suitable evidence required to demonstrate this), that the activities carried out are inconsistent and cannot be made consistent with acceptable living conditions for nearby residents, and the redevelopment of the site would secure an overriding public benefit.

5.4.9 Policy DMCI A (Development of new education floorspace) establishes four criteria that proposals for new schools and school expansions will be assessed against, these being: the size of the site, its location and suitability considering compatibility with surrounding uses and policy designations; the impact on green space, games pitches, outdoor play and amenity space; the location and accessibility of the site; and the extent to which the building contributes to national zero carbon targets for new schools.

5.4.10 Policy DMEI 4 (Development in the Green Belt or on Metropolitan Open Land) is important to consider due to the site's Green Belt designation. This policy establishes that in line with NPPF and London Plan policy inappropriate development in the Green Belt will not be approved unless there are very special circumstances. Extensions and the redevelopment of sites in the Green Belt will only be permitted where the there is no greater impact on the openness of the Green Belt, having regard to:

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

5.4.11 Policy DMEI 7 (Biodiversity protection and enhancement) explains that new developments should be designed to retain and enhance existing biodiversity features on site. Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated or as a last resort compensated for should be refused.

5.4.12 Policy DMEI 9 (Management of Flood Risk) relates to development proposals in Flood Zone 2 and 3. The application site is in Flood Zone 1 however in the context of the proposed development and to ensure good practice a flood risk assessment has been provided with this application.

5.4.13 Policy DMCI 5 (Children's play areas) stipulates that for all major development, the Council will apply the Hillingdon Child yields and London Plan SPG 'providing for children and young people's play and informal recreation' which remains valid guidance for the 2021 adopted London plan. The loss of existing play spaces will be resisted other than in circumstances set out in policy DMHB 19.

5.4.14 Policy DMCI 7 (Planning obligations and community infrastructure levy) explains that planning obligations will be sought on a scheme-by-scheme basis to ensure amongst other things that proposals provide improvements to mitigate site-specific impacts.

5.4.15 Policy DMT 1 (Managing transport impacts) requires Transport Assessments/Statements to be submitted for new developments depending on appropriate thresholds so that transport impacts can be properly assessed. Local Level Travel Plans may also be required.

5.4.16 Policy DMT 2 (Highways impacts) requires development proposals to provide safe and

efficient vehicular access to the highways network; not to contribute to deteriorating air quality, noise or local amenity or safety of road users/residents; to provide safe, secure and convenience access and facilities for cyclists and pedestrians; to minimise impacts on local amenity and congestion; and suitable mitigation addresses traffic impacts.

- 5.4.17 Policy DMT 5 (Pedestrians and cyclists) requires safe, direct and inclusive access to be provided for pedestrians and cyclists on the site, connecting it to the wider network.
- 5.4.18 Policy DMT 6 (Vehicle parking) requires development proposals to comply with parking standards (Appendix C Table 1 to the Plan) or the Council may agree to vary the requirements where the variance where this would not give rise to a deleterious impact on street parking, congestion or local amenity; and/or a transport appraisal and travel plan has been approved and parking accords with its recommendations. All car parks should provide spaces for wheelchair users and those with restricted mobility.

## **5.5 London Plan 2021**

- 5.5.1 An overarching principle underpinning the policies of the London Plan is that of 'Good Growth'. The London Plan describes this concept as "growth that is socially and economically inclusive and environmentally sustainable" (paragraph 0.0.18). There are six cross-cutting policy objectives that are set out to deliver 'Good Growth', of which the following are relevant to the proposed development: Building strong and inclusive communities (policy GG1); Making the best use of land (policy GG2); Creating a healthy city (policy GG3); and Increasing efficiency and resilience (policy GG6).
- 5.5.2 In addition, the following policies are relevant to consider:
- 5.5.3 Policy D2 (Infrastructure requirements for sustainable densities) sets out that the density of proposals should consider and be linked to the provision of future planned levels of infrastructure and be proportionate to the site's connectivity and accessibility.
- 5.5.4 Policy D3 (Optimising site capacity through the design-led approach) establishes a design-led approach to optimising a site's capacity. This means ensuring that development is of the most appropriate form and land use for the site. Form and layout of buildings and spaces should enhance local context by positively responding to local distinctiveness.
- 5.5.5 Policy D4 (Delivering good design) explains that Masterplans and design codes can be used to bring forward development that delivers high quality design and place-making. Design and Access Statements should deliver compliance with London Plan design requirements. Design quality should be retained through to development completion.
- 5.5.6 Policy D5 (Inclusive design) expects development proposals to achieve the highest standards of accessible and inclusive design and for Design and Access Statements submitted with proposals to include an inclusive design statement.
- 5.5.7 Policy D8 (Public realm) states that development proposals should explore

opportunities where appropriate to create new public realm. The policy sets out specific considerations that public realm should strive to achieve.

- 5.5.8 Policy D11 (Safety, security and resilience to emergency) states that development proposals should maximise building resilience and minimise potential physical risks. Measures should be included to design out crime that are inclusive and aesthetically integrated into the development and the wider area.
- 5.5.9 Policy D12 (Fire Safety) requires all proposals to achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space; are designed to incorporate appropriate features to reduce risks to life and serious injury in the event of a fire; are constructed in an appropriate way to minimise risk of fire spread; provide suitable and convenient means of escape; and develop a robust strategy for evacuation. All major proposals should be submitted with a Fire Statement; a Fire Statement has been submitted with the application that meets the policy requirements.
- 5.5.10 Policy D13 (Agent of change) places the responsibility for managing the impact of noise on the new development. This requires that if a noise-generating use is located close to noise-sensitive uses, the building or activity should be designed to protect existing users from noise impacts; or if the proposal is close to a noise-generating use, they should be designed in a way to protect new occupiers.
- 5.5.11 Policy D14 (Noise) expects development proposals to manage noise in-line with the Agent of change principle; avoid significance adverse noise impacts on health and quality of life; mitigate and minimise existing impacts of noise without placing unreasonable restrictions on existing noise-generating uses; improve and enhance the quality of acoustic environment and promote appropriate soundscapes; separate new noise sensitive development from major noise sources, or where that is not possible to control potential adverse effects; and promote new technologies/improved practices to reduce noise.
- 5.5.12 Policy S1 (Developing London's social infrastructure) emphasises that proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported, as should proposals that make the best-use of land.
- 5.5.13 Policy S3 (Education and childcare facilities) seeks to ensure that there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice. The policy sets out specific considerations that development proposals for education and childcare facilities should achieve, including locate facilities in areas of identified need and in accessible locations. There should be no net loss of reduction of childcare facilities.
- 5.5.14 Policy S4 (Play and informal recreation) states that development proposals likely to be used by children should: increase opportunities for play and informal recreation; incorporate accessible routes for children and young people to existing play provision; and not result in the net loss of play provision unless it can be demonstrated there is

no ongoing or future demand.

- 5.5.15 Policy S5 (Sports and Recreation facilities) establishes that existing sports and recreational land and facilities for sports and recreation should be retained unless an assessment has been undertaken which clearly shows the land or facilities to be surplus to requirements; or the loss would be replaced by equivalent or better provision in terms of quantity or quality.
- 5.5.16 Policy G2 (London's Green Belt) sets out that the green belt should be protected from inappropriate development. The national policy tests apply in terms of demonstrating very special circumstances for proposals that would harm the green belt. Where met, the enhancement of the Green Belt to provide multi-functional beneficial uses for Londoners should be supported.
- 5.5.17 Policy G5 (Urban greening) expects major proposals to incorporate measures to contribute to the greening of London. Boroughs should develop an Urban Greening Factor (UGF). Table 8.2 establishes target scores for different types of developments.
- 5.5.18 Policy G6 (Biodiversity and access to nature) expects development proposals to manage biodiversity and achieve biodiversity net gain.
- 5.5.19 Policy G7 (Trees and woodlands) states that development proposals should ensure that, wherever possible, existing trees of value are retained. Where trees are required to be removed, adequate replacement should be provided. The planting of new trees should generally be included in new developments.
- 5.5.20 Policy SI1 (Improving air quality) expects new development proposals to be at least Air Quality Neutral. An Air Quality Assessment (AQA) is required for major proposals, and an assessment has been provided with the application that meets the policy requirements.
- 5.5.21 Policy SI2 (Minimising greenhouse gas emissions) sets out that major development should strive to be net-zero carbon through being 'lean', 'clean', 'green' and 'seen'. For major development proposals an energy strategy is required, and an on-site reduction of 35% or more beyond the Building Regulations must be demonstrated.
- 5.5.22 Policy SI5 (Water infrastructure) states that development proposals should achieve mains water consumption of 105 litres or less per head per day and incorporate measures to help achieve lower water consumption rates. Adequate wastewater infrastructure capacity should be provided, and action should be taken to minimise potential for misconnections between foul and surface water networks.
- 5.5.23 Policy SI6 (Digital connectivity infrastructure) is concerned with the provision of digital infrastructure within developments. The policy encourages proposals to exceed minimum required connectivity speeds set by regulations and to demonstrate the availability of mobile connectivity throughout the development.
- 5.5.24 Policy SI7 (Reducing waste and supporting the circular economy) seeks to promote a

circular economy by incorporating these principles into the design of new developments (see also policy D3).

- 5.5.25 Policy SI12 (Flood risk management) looks to ensure that developments minimise and mitigate flood risk and address any residual flood risk.
- 5.5.26 Policy SI13 (Sustainable drainage) sets out that proposals should aim to achieve greenfield run-off rates and sets a preference for green over grey features in line with the policies defined drainage hierarchy. Development proposals for impermeable surfacing are acceptable where it has been demonstrated that they can be shown to be unavoidable.
- 5.5.27 Policy T1 (Strategic approach to transport) supports development proposals that facilitate trips to be made on foot, cycle or by public transport. All developments should make effective use of land, reflecting its connectivity and accessibility.
- 5.5.28 Policy T4 (Assessing and mitigating transport impacts) requires the submission of transport statements or assessments in line with local or national guidance. Regard should be had to TfL Guidance.
- 5.5.29 Policy T5 (Cycling) looks to secure appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Table 10.2 sets out the minimum cycle parking standards for long-stay and short-stay parking for different use classes.
- 5.5.30 Policy T6 (Car parking) explains that developments that are not car-free, should be designed to provide the minimum necessary parking. Maximum standards for non-residential disabled persons parking are set out at policy T6.5 (Table 10.6). All operational parking should make provision for infrastructure for electric or other Ultra-Low Emission Vehicles and adequate provision should be made for deliveries and servicing and emergency access.

## 6. Planning Assessment

### 6.1 Introduction

6.1.1 This section provides an assessment of the proposed development in planning terms.

### 6.2 Principle of Development

6.2.1 This section reviews the key components of the proposals against policy requirements set by the relevant development plans and the National Planning Policy Framework.

#### *Presumption in Favour of Sustainable Development / Delivering on ‘Good Growth’ Principles*

6.1.1 In accordance with Local Plan policy NPPF1 which aligns with paragraph 11 of the NPPF, planning decisions should apply a presumption in favour of sustainable development. An assessment of the proposals against the social, environmental and economic objectives of sustainable development is set out below:

- **A social objective:** The proposed new school has been well-designed to create a safe and enjoyable learning environment for its pupils. The delivery of a new special school will help to meet the current and future needs for SEND pupil places, improving equality of access to education provision in Hillingdon.
- **An economic objective:** This objective supports the role of the planning system in identifying and coordinating the provision of infrastructure. The provision of a new school on a sustainably located site will provide the right land use in the right places in the right time to support growth.
- **An environmental objective:** The new school will make effective use of land through the re-use of a redundant boarding building which is surplus to the requirements of the Harefield Academy. Opportunities to improve biodiversity on the site have been actively explored and measures incorporated to adapt to climate change, as explained in further detail in this appraisal.

6.1.2 New development should also deliver of principles of ‘Good Growth’ as set out in the London Plan. In particular, the proposed development supports the delivery of policy GG1 by building inclusive growth where all Londoners regardless of their disability can share in its prosperity, culture and community. The proposals also make the best use of land in line with objectives of policy GG2 by developing on predominantly brownfield land and utilising a small site, and provide extensive spaces of play, recreation and sports as promoted by policy GG3.

### *Development of New Education Floorspace*

6.1.3 The proposals consist of a change of use of a residential boarding block to a teaching building for a new special school and the delivery of an extension to the building to provide additional classroom and breakout teaching spaces.

6.1.4 In this regard policy CI1 of the Local Plan establishes the principle of extending the boarding building to improve the capacity of school sites. It is important to note that the supporting text to CI1 specifically states that the development of new schools and school expansions on Green Belt land may be necessary due to the limited capacity of existing school sites (see paragraph 9.49). Finding new sites for schools and school expansions is considered challenging in London, and particularly so in outer London borough's such as Hillingdon where evidence indicates many schools are at or near full capacity.

6.1.5 The principle of delivering new education floorspace is also supported by Strategic Objective 6, which links to the delivery of policy CI1. This provides support to proposals that promote social inclusion through equality of access to educational facilities, with specific recognition to acknowledging residents living in areas of identified need. The need for a new SEND school in Hillingdon in this regard is clear, as demonstrated in **Section 3** of this Statement.

6.1.6 Policy DMCI 1A of the Local Plan Part 2 provides criteria against which proposals for new schools and school expansions should be assessed. An assessment of the proposals against the requirements of this policy is provided in **Table 6.1**.

**Table 6.1 – Planning Assessment of Policy DMCI 1A of the Local Plan Part 2**

Criterion	Description	Policy Assessment
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).	<p>The site of the proposed SEND school is adjacent to an existing school located entirely within designated Green Belt land and establishes the principle of education development in this location.</p> <p>Whilst the school will fill an existing gap between the boarding building and residential properties to the east, a suitable separation distance will be maintained and the site's landscaped perimeter (proposed to be enhanced through new planting) provides extensive screening from residential properties, ensuring compatibility with surrounding uses.</p> <p>The size of the site is appropriate to accommodate existing pupil places</p>

		from Meadow High School, whilst having capacity to support additional school places.
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.	<p>The new school will provide an outdoor Multi-Use Games Area which meets BB104 space guidelines for SEND pupils.</p> <p>The external areas of the site are currently comprised of neglected areas of hardstanding and sports pitches which will be reconfigured to accommodate specialist PE space for pupils at the new school.</p> <p>The site is not within an area of open space deficiency.</p>
C	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.	<p>The site of the new school will establish a suitable location in relation to the catchment area. It is envisaged that the school will retain school places within the borough by providing an additional facility for pupils with MLD and autism for which there is a pressing need.</p> <p>The site is well served by public transport with a number of bus stops located along Northwood Road.</p> <p>The submitted Transport Statement comments on the expected car and cycle parking demand for the new school and confirms that these numbers can be accommodated without adverse impact on highways safety.</p>
D	D) The extent to which the building design contributes towards the government target that schools and colleges should be zero carbon from 2016.	Low carbon energy saving measures including heat pumps and a green roof have been incorporated into the proposed design where feasible in line with the London Plan 'Be Clean' approach to minimising emissions (Further details are provided in the submitted Sustainability Report).

## 6.2 Reconfiguration of Land for Sports Provision

### 6.2.1 The reconfiguration of existing sports pitches serving Harefield Academy (with access

also open to the community) is required in order to provide a dedicated Physical Education space for pupils at the new school that meets BB104 requirements. Specifically, three existing tennis courts will be repurposed.

6.2.2 The proposed MUGA space for SEN pupils is an alternative type of sports provision to the existing tennis courts which would be partially replaced with one court retained.



Figure 6.1 – Existing Visual showing Location of existing Pitches

6.2.3 The Harefield Academy's agent has confirmed that the facilities are considerably underused by the local community, with just one booking in the current school year. With a highly reduced school roll the facilities are considerably underused by students for both PE and break time play. The new reconfigured space and dedicated PE area is a necessary requirement for a SEND school in line with BB104, and the benefits of providing this space for the health and well-being of pupils are multi-faceted.

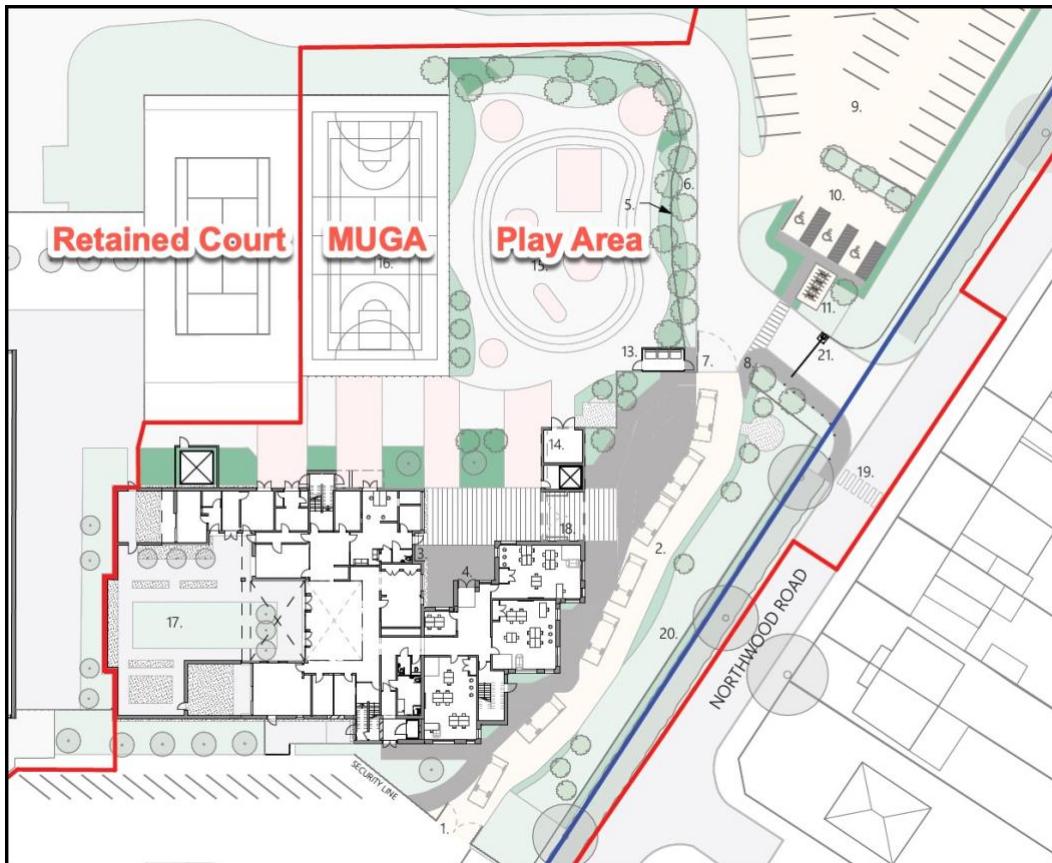


Figure 6.2 – Proposed Locations of Sports Facilities

6.2.4 We consider that exception C of NPPF paragraph 99 outweighs the loss of the current sports provision. The paragraph explains that existing sports pitches can be built on where the development is for an alternative type of sports and recreational provision and the benefits of that use clearly outweigh the loss of the current or former use. In that regard the following policies support the benefits of the reconfiguration of the sports pitches to provide a MUGA for SEND students:



**Figure 6.3 – Visual of Proposed Games Area and Corner of MUGA**

6.2.5 Paragraph 95 of the NPPF highlights the importance of sufficient school choices for existing communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement to widen educational choice.

6.2.6 The Harefield Academy is the only viable site within the Borough for the Council to place the Meadow School expansion for the following reasons:

- Clear evidence of capacity at The Harefield Academy
- Construction on a previously used site. Ruling out the need to develop on greenfield sites.
- The availability of land to accommodate a SEND School and its security needs and accessibility.

6.2.7 Policy D5 of the London Plan highlights that development proposals should provide high quality people-focussed spaces that are designed to facilitate social inclusion. It is clear that the siting of the Meadow High School expansion at the Harefield Academy is not

feasible without the provision of a specialised MUGA for Pathway 1 student use. This is required to enable them to take part in Physical Education which is integral element of the curriculum. The proposed MUGA is an essential space for SEND schools in line with National Guidance (DfE Area Guidelines for SEND and Alternative Provision Guidance (BB104)).

- 6.2.8 Local Plan Strategic Objective SO6 seeks to Promote social inclusion through equality of opportunity and equality of access to social, educational, health, employment, recreational, green space and cultural facilities for all in the borough. The need for the SEND school is significant and access to education and recreational space is a clear consideration for any planning application, especially when related to the provision of a new educational facility for Pathway 1 students.
- 6.2.9 Local Plan Strategic Objective SO9 seeks to promote healthier and more active lifestyles through the provision of access to a range of sport, recreation, health and leisure facilities. Exercise and its health benefits are an integral element of the curriculum at Meadow High School and the provision of the MUGA is essential to enable students take part in PE and to be involved in play activities.
- 6.2.10 Policy DMCI 1A provides the context for which this development should be assessed against. The impact on sports pitches should be directly weighed up against the need for new educational floorspace. The assessment on DMCI 1A is provided in **Table 6.1** above.
- 6.2.11 Furthermore, the courts are not used in their entirety for PE lessons at Harefield Academy and are used by ten students at most in any given breaktime. It is in this context that the proposal to reconfigure the existing MUGA space has been developed. No more than one third of this space for either internal or community use is required to be retained based on the existing and projected demand for community access.
- 6.2.12 The proposals therefore satisfy exception A to policy DMCI 1 and the applicant expects that the principle of proposed a MUGA space for pupils at the new school will be fully supported.

### **6.3 Design of Development**

- 6.3.1 The design of the proposed development is considered in detail in the accompanying Design and Access Statement prepared by Chadwick Dryer Clarke Architects.
- 6.3.2 The existing building comprises residential accommodation (principally a series of bedrooms and kitchens) arranged over three storeys around a central atrium. Primary circulation is via a 1.5m wide walkway around the atrium.
- 6.3.3 BB104 suggests a corridor width of around 2.2m to major circulation routes to enable a turning circle for wheelchair users in special schools. Therefore, the walkways will need to be widened to upper floors. An 8P lift services the upper floors, but it is unlikely that this size of lift will suit the needs of the school given the needs of some of its pupils. It is

therefore proposed that a new 13P lift will be installed to improve vertical circulation and act as an evacuation lift in the event of an emergency.

- 6.3.4 The existing building has a cellular layout, formed using a CLT structure, which has been based upon the need to form bedroom spaces as the original use of the building. The structure is fire-protected and acoustically treated with applied plasterboard linings.
- 6.3.5 A change of use to a school building requires much larger spaces to be formed to create classrooms, common rooms etc. This will require the removal of non load-bearing walls as well as some load-bearing/ shear walls.
- 6.3.6 The floor-to-floor storey heights are approximately 3m, which suits the residential nature of the boarding block. However, this is low for a school building, and so services distribution and the ventilation strategy will need to avoid the need for deep ceiling voids by avoiding large air ducts or cross-overs. With low ceilings and deeper rooms to be formed for classroom spaces, some windows require amendment/ replacement to provide better levels of ventilation to these spaces. Additionally, new window openings are required in the external envelope to suit new room positions.
- 6.3.7 The accommodation for the site has been guided by the principles of **BB104 - Area Guidelines for SEND and Alternative Provision** and informed by the input of the specialist teaching team at Meadow High School as well as the education team at London Borough of Hillingdon. The design rationale has been assessed against development policy and it is considered that the development achieves compliance with London Plan policy D3 and D4, Local Plan policy DMHB 11 and national area guidelines for SEND provision.
- 6.3.8 The material palette of the building has been selected to pick up characteristics of the existing building without using render finishes. For fire and robustness purposes, brick is the preferred cladding material. A pale/ white brick is used for upper areas, with a dark/ black brick used in key areas and particularly at low level to suggest a solid plinth to the new extension (similar to the existing building). Soldier coursing is proposed a key areas around openings and at the entrance gate.
- 6.3.9 Windows are intended to be aluminium/ timber composite to match the existing building but will be triple glazed to the extension to ensure a better thermal performance. High-level louvres are integrated into the window assembly to suit the hybrid ventilation strategy. The windows are intended to be picked out in a durable Accoya timber to add visual warmth and close the wall cavities. The roof will be edged with gravel towards a PPC aluminium coping.
- 6.3.10 Re-purposing the redundant residential building to a new active community use is a highly sustainable approach by the school. The existing building is only 11 years old and as such has reasonably good levels of thermal performance and energy use.
- 6.3.11 The proposals establish a design-led approach to optimising The Harefield Academy site. The development is of the most appropriate form and land use for the site and is therefore

considered to comply with Policies D3 and D4 of the London Plan. In addition, the design has included the use of high-quality materials and finishes and maximises the sustainability of internal layout and design to comply with Local Plan Policy DMHB 11.

## **6.4 Green Belt Considerations and Assessment**

6.4.1 This section reviews the proposals against relevant policy tests for development in the Green Belt. An assessment is first provided as to why the development is 'appropriate' development in the Green Belt. To ensure a robust approach, whilst the development is seen to benefit from two policy exceptions, very special circumstances are set out below on the basis that the proposals are deemed to be 'inappropriate' development in the Green Belt.

### **Appropriate Development in the Green Belt**

6.4.2 National Green Belt policy provides certain exceptions to inappropriate development for the construction of new buildings in the Green Belt. The London Plan directs decision makers to national policy tests for Green Belt, however the Hillingdon Local Plan Part 2 provides further specific policies which are considered in this appraisal.

6.4.3 The proposed development is seen to benefit from the following exceptions in national Green Belt policy detailed at paragraph 149:

- c) "the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building"; and
- g) "limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings) which would not have a greater impact on the openness of the Green Belt than the existing development"

### *Proportionate Additions*

6.4.4 Exception c) of paragraph 149 of the NPPF provides that the construction of new buildings should not be regarded as inappropriate where a building extension is not disproportionate to the original building; the NPPF defines an 'original building' as "A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally".

6.4.5 What constitutes a 'disproportionate addition' is a matter of planning judgement in decision making rather than a matter of law. Similarly, there is no strict definition of how proportionality should be measured in the NPPF despite the reference to 'size' in paragraph 149.

6.4.6 There are very few precedents in terms of appeal decisions relating to extensions to school buildings in the Green Belt, however for other non-educational development in the Green Belt volume increases upwards of 50% have been deemed not to be

disproportionate. In an appeal relating to a proposed rear two storey infill extension with detached garage in Seale<sup>1</sup>, a volume increase of 72% in the size of the original dwelling was deemed to satisfy the 149 c) exception.

6.4.7 In providing an assessment against exception c) for the proposed development, regard has been had to the form, height, massing, and design of the proposed extension to the former residential building block. The proposal seeks to extend the original building by 39% (GEA percentage change). The change in building volume is approximately 34% of the existing building. This is seen as a modest increase in the external floor area and is not considered 'disproportionate' to the residential boarding block which occupies a considerably greater floor area.

6.4.8 A comparison of the volume of the proposed extension compared to the existing boarding building is provided in **Table 6.2**.

**Table 6.2: Comparison of Existing and Proposed Building Volumes**

	Original Building	Extension	Percentage Change (%)
Floor Area (GEA) (m <sup>2</sup> )	1,762	688	39%
Volume (m <sup>3</sup> )	6430	2185	34%

6.4.9 The submitted Design and Access Statement also confirms that the massing of the extension is appropriate to the original building and its setting. The extension would not be greater than the existing building by virtue of its height, land coverage or overall size.

6.4.10 In sum, the development would not result in a disproportionate addition to the original building and therefore falls under paragraph 149 exception c).

<sup>1</sup> See APP/Y3615/W/18/3202309



**Figure 6.4 – Visual of The Proposed Development – Extension is the area with green roof**

*Limited Infilling or Partial or Complete Redevelopment of Previously Developed Land*

6.4.11 The proposed development is also considered to benefit from exception g) of paragraph 149 which provides that development for limited infilling or partial or complete redevelopment of previously developed land where there would be no greater impact on Green Belt openness when compared to the existing development will be considered 'appropriate'.

6.4.12 The existing site adjacent to Harefield Academy comprises of predominantly previously developed land, thus it is necessary to review whether the proposed development would lead to a greater impact on Green Belt openness when compared to existing development.

6.4.13 Openness is an essential characteristic of the Green Belt and can be taken as the absence of buildings and development. Openness has been described by the Courts as an 'open textured' concept where a number of factors are capable of being relevant (see *Turner v Secretary of State for Communities and Local Government [2016]*). In considering the effects of a proposal on Green Belt openness, visual and spatial effects may be relevant to consider.

6.4.14 The term 'greater impact on openness' was reviewed in the judgement of *Euro Garages Ltd v The Secretary of State for Communities and Local Government & Anor [2018]* under then paragraph 89 of the 2012 Framework. In this case, the courts found that it was an

error of law to treat any change as having a greater impact on the openness of the Green Belt rather than considering the harm, if any, wrought by the change (see in particular paragraph 34).

6.4.15 In spatial terms, it is not considered that the spatial extent of the Green Belt would be to any significant extent diminished by the proposed development; the proposal is a modest-sized extension with a small footprint. It is however accepted that there would be an inevitable loss in the spatial extent of the Green Belt as a result of the additional land take.

6.4.16 However, in line with the *Euro Garages* case, it is necessary to assess the extent to which there is a 'greater impact' on the basis of a consideration of harm, rather than merely a degree of change. Owing to the site's spatial containment, the extension to Harefield Academy would be viewed in the context of the existing school site which comprises a taller three-storey building with less discrete massing. The perceived spatial impact on Green Belt openness created by the extension would therefore be no greater than the existing development.

6.4.17 Visual impacts on the openness of the Green Belt are mitigated due to the site's strong visual containment, with the site benefiting from a high level of screening at its boundaries. Dense vegetation along the site's eastern boundary along Northwood Road (which is proposed to be enhanced with the additional planting proposed as part of this application) provides good visual containment from the countryside to the north and screens the site from public vantage points. Views across the site to the open countryside are thus already very restricted and would not be any further diminished by the modest extension.

6.4.18 An appeal decision relating to a proposal in the Green Belt on a similarly well-contained site in a London Borough is provided at **Appendix 2**. This was a scheme in LB Hillingdon for the demolition of an existing car wash and the development of a drive-thru<sup>2</sup> coffee shop where the Inspector considered that despite the increased building footprint created by the proposed drive-thru, there would be limited harm to the wider Green Belt in respect of diminishing its spatial extent beyond the existing site. This was largely due to the containment afforded by the site's landscaped bunds (refer to paragraphs 13 and 14 in particular).

6.4.19 As described above, the application site benefits from many of these factors in terms of its containment and the relationship of the extension to the existing structures on site and should therefore be assessed in similar terms.

6.4.20 Overall, there will not be a greater impact on openness than the existing development due to the character, location, and visibility of the site. Exception G is therefore met.

<sup>2</sup> APP/R5510/W/19/3229922

## Summary

6.4.21 As a result of the above appraisal against the relevant Green Belt exceptions, the proposed development is appropriate development in the Green Belt. The development falls under the terms of the exceptions at paragraph 145(c) and 145(g) of the Framework and is therefore appropriate development in the Green Belt.

### *Local Plan Policy DMEI 4*

6.4.22 Policy DMEI 4 of the Hillingdon Local Plan Part 2 provides additional considerations for the development of extensions to existing buildings and the redevelopment of sites in the Green Belt. A planning assessment of the proposals against the criteria of policy DMEI 4 is provided in **Table 6.3** below.

**Table 6.3 – Planning Assessment of Policy DMEI 4**

Policy Consideration	Policy Assessment
The height and bulk of the existing building on the site	The height of the proposed extension is a lower than the existing building and its massing more discrete. Further commentary in this regard is provided within the submitted DAS.
The proportion of the site that is already developed	The entirety of the application site is previously developed land.
The footprint, distribution and character of the existing buildings on the site	The existing buildings on site occupy a larger footprint than the proposed extension. The extension is not a disproportionate addition to the existing building as demonstrated by the comparison of building volumes/areas.
The relationship of the proposal with any development on the site that is to be retained	Minimal existing development on the site is proposed to be retained, and external areas of hard standing and MUGA sports pitches are to be replaced by uses which will not have a greater impact on the openness of the Green Belt. The extension to the former boarding building will be viewed in the context of the existing school site, ensuring existing relationship will be maintained.
The visual amenity and character of the Green Belt and Metropolitan Open Land	The application site does not contribute greatly to the visual qualities of the Green Belt which are already comprised in this location by built form including main Academy school buildings and would not be diminished any further by the proposed extension.

### *Assessment Against Green Belt purposes*

6.4.23 The Green Belt serves five purposes which are identified at paragraph 138 of the NPPF. An assessment of the proposed development and the contribution of the site against Green Belt purposes is set out below.

#### **a) to check the unrestricted sprawl of large built-up areas**

6.4.24 Harefield is not considered to be a large-built up area. In any event, the site is located within a wedge of green belt land which is previously developed land and is bordered by residential development to the south-east and south-west. Hedgerows and trees to the north and east of the site provide strong boundary points preventing any sprawl. There will therefore be no impact against this Green Belt purpose.

**b) to prevent neighbouring towns merging into one another**

6.4.25 The Green Belt's purpose will be unaffected by the proposed development. As above, the site occupies a wedge of land which already contains established built development. The proposed extension to the existing academy boarding block will not lead to the coalescence of neighbouring towns as this fills an existing gap between the boarding block and residential properties to the east.

**c) to assist in safeguarding the countryside from encroachment**

6.4.26 The site has strong boundary points which provide strong containment, therefore preventing encroachment into the countryside. There will be no impact against this Green Belt purpose.

**d) to preserve the setting and special character of historic towns**

6.4.27 Harefield is not a recognised historic town, and therefore this Green Belt purpose is not a relevant consideration.

**e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

6.4.28 As above, the site is predominantly previously developed land. The proposals involve the change of use of an unused residential boarding block which will restore the building into beneficial use. This will assist in regenerating the site and recycling urban land. The proposals clearly have a positive effect on this Green Belt purpose.

## **Very Special Circumstances**

6.4.29 We would reiterate that the application proposal is of a type that is an 'exception' to Green Belt policy and is therefore considered 'appropriate development' which, by definition, is not harmful to the purposes of the Green Belt.

6.4.30 It has also been demonstrated by the above analysis that the proposals will not give rise to any negative impacts to Green Belt purposes as identified in paragraph 138 of the NPPF.

6.4.31 Notwithstanding the absence of a requirement to justify Very Special Circumstances (VSC's) due to the appropriate nature of the development in the Green Belt, for robustness a case for VSC's is presented. This assumes that the proposals are

'inappropriate development', which is (by definition) harmful to the Green Belt and should not be approved except in very special circumstances.

6.4.32 Very Special Circumstances ('VSC's') are not defined within the Framework or development plan. As such the case for VSC is to be judged on a case-by-case basis taking the form of a qualitative judgement. In making this judgement, a number of factors, ordinary in themselves, can combine to create something very special<sup>3</sup>.

6.4.33 For the proposed development, the following factors are considered to combine to create Very Special Circumstances:

1) **The extension to the Harefield Academy is critical to enable the existing Meadow special school to continue to meet SEND demand.**

6.4.34 A review of pupil place numbers has been undertaken in **Section 3** of this Statement in support of the case for the need for the proposed development.

6.4.35 This identifies that without the scheme, 82 places will be lost as some old modular units at Meadow High School have come to the end of their lifespan and are required to be removed in line with the planning conditions associated with the modular buildings' temporary permission.

6.4.36 The existing school is at full capacity therefore classroom spaces that would otherwise be lost as a consequence of the demolition of the modular units cannot be accommodated within the existing Meadow main school building. Meadow High School is the only SEND secondary school within the Borough that supports children with Moderate learning Difficulties (MLD) and Autism Spectrum Disorder (ASD). It is thus critically important that the school continues to meet the needs of its existing cohort. The proposed development will address this as well as providing capacity for additional places.

6.4.37 The need to enable Meadow High School to continue to meet existing pupil places that would otherwise be lost carries significant weight in favour of the proposals and constitutes a Very Special Circumstance.

2) **The proposals will meet the pressing future need for additional SEND provision in the Borough**

6.4.38 Notwithstanding the pressing need to avoid losing pupil places currently provided at Meadow High School, there is a critical borough-wide need for additional provision across the borough, including a recognised shortfall in provision for pupils with Moderate Learning Difficulties with Autism (MLD and ASD).

6.4.39 The proposed development will secure an additional 90 pupil places of which 82 will be

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<sup>3</sup> see *R (Basildon DC) v First Secretary of state and Temple* [2004] EWHC 2759 (admin).

the reprovision of existing places at Meadow High School. The provision of 8 places to meet the demand for additional places is a significant benefit of the scheme and will contribute towards meeting this identified need.

**3) The suitability of the site to accommodate dedicated PE and Classroom spaces for pupils at the new school**

6.4.40 The proposed development will provide dedicated classroom and breakout teaching spaces for pathway 1 SEN pupils. These are essential spaces for SEND schools in line with National Guidance (DfE Area Guidelines for SEND and Alternative Provision Guidance (BB104)). This guidance provides that all special schools should accommodate in one or more spaces:

- Assemblies (for the whole school in small special schools but key stages in larger schools), examinations (where relevant), public performances, parents' evenings and community events
- Dining
- PE/ movement

6.4.41 Paragraph 95 of the NPPF gives 'great weight' to the need to expand and alter schools and pupils are currently disadvantaged by the quality of existing facilities. In this regard, there is a compelling need to create a new school in order to accommodate existing pathway 1 pupils at Meadow and to meet the need for additional places.

6.4.42 The site at Harefield Academy is centred upon an unused residential boarding block which is surplus to the requirements of the Academy. The boarding building will undergo a series of internal alterations in order to provide the necessary classroom and breakout teaching spaces to support the needs of Pathway 1 pupils.

6.4.43 The site is appropriate for the identified cohort due to the site being able to be made stand alone and secure, with a local community for integration and educational purposes. The proposed dedicated PE area on the site creates an all year round accessible and safe space for SEN pupils. This is a necessary requirement for all special schools in line with DfE guidance. There are underused external areas on the site including sports pitches at Harefield Academy which can provide the required provisions for the particular cohort.

6.4.44 The installation of the MUGA will mean that the new SEN school can offer a wider repertoire of physical activities and, through this, encourage more children to take part. Children can also use MUGAs to play on during break and lunchtimes. This provides all students with the opportunity to participate in enjoyable, physical activity every day of the week and, in doing so, increases the time they can be active far beyond that which is allocated in the timetable. This therefore complements the education and care facilities to be provided within the new school.

### *Summary of Very Special Circumstances*

6.4.45 The above VSCs should be afforded substantial weight. The need for the proposal has been robustly and comprehensively demonstrated and these other considerations when combined clearly outweigh any Green Belt harm.

## 6.5 Transport, Access and Servicing

6.5.1 The development is proposed in an accessible location with the eastern boundary of the site along Northwood Road providing access to public transport and bus stops. A full assessment of the transport impacts is provided in the Transport Statement prepared by Robert West Transport Planners.

6.5.2 Trip generation for pupils at the new school is outlined in **Table 6.4**.

Mode of travel	% of pupils	No. pupils	No. pupils per vehicle	No. vehicle trips
Minibus	67%	60	6 – 7	9
Private car (parent drop-off/collection)	30%	27	1	27
Taxi	2%	2	2	1
Walk	2%	2	N/A	N/A
<b>Total</b>	<b>100%*</b>	<b>90</b>	<b>84</b>	<b>37</b>

**Table 6.4 – Proposed Pupil Trips at The Harefield Academy Site**

### *Access, Pick-up and Drop-off*

6.5.3 As part of the plans to make the development acceptable for Pathway 1 students, a new vehicular access to the school is proposed on Northwood Road in the same location as the temporary access that existed during construction of The Harefield Academy.

6.5.4 Most students at the new school will arrive via a special minibus service operated by the Council, which requires a direct drop-off and pick-up service immediately outside of the entrance doors of the school (Please see **Figure 6.5** below). Therefore, the new access will allow the vehicles to drive into the site through the Academy car park and exit straight onto Northwood Road. This enables us to create a secure, enclosed entrance feature for the school to meet SEND school standards. As such the proposals comply with NPPF Paragraph 110 to provide safe and suitable transport access. In addition, the proposed access, pick-up and drop-off proposals comply with London Plan policies T5 and T6 as well as DMT 1 of the Local Plan to provide equal access for all people, including inclusive

access for disabled people.



**Figure 6.5 – Visual of new entrance feature**

#### *Delivery and Servicing*

- 6.5.5 Currently, service vehicles for the existing academy enter via the car park and run along the southern boundary of the boarding block, around to the eastern boundary of the site and up to the main refuse and delivery locations. Under the new plans, these vehicles would share the new Northwood Road access to prevent the existing gate/fence line at the boundary of the car park and service road from needing to be used during school hours, maintaining the secure line at the entrance of the new school.
- 6.5.6 It is anticipated that there will be two-three deliveries per day reflecting the existing numbers of delivery vehicles at Meadow High School. The proposed development will not generate significant delivery vehicle movements.

#### *Car Parking*

- 6.5.7 Surveys undertaken in support of the proposed development have identified parking demand for 36 staff. It is proposed that the majority of these spaces will be provided for to the east of the proposed new access off Northwood Road on an area of existing hard standing. However, not all of this identified parking demand can be met within the application site, therefore it will be necessary be prior agreement for 10 staff to use the Harefield Academy car park. Details of this procedure are discussed in section 6 of the Transport Statement.

6.5.8 Reflecting the requirements of the development plan, the proposed development will provide 25 spaces. Furthermore, 5% of parking spaces will be for disabled parking provision and a further 5% will be 'enlarged bays', as sought by London Plan policy T6. As highlighted in the Transport Statement the vehicle parking standards will be met by this proposal and as such the proposed development complies with Policy DMT 6 (Vehicle Parking) of the Local Plan including wheelchair accessibility.

#### *Cycle Parking*

6.5.9 Due to the specific transport requirements of pupils cycle parking can only be provided for staff. This approach has been agreed with Hillingdon Council in pre-application discussions with the transport officer. 45 members of staff will be employed at the school which in line with London Plan standards leads to a requirement for a minimum of 6 long-stay spaces (standard of 1 space per 8 FTE staff). 2 short-stay spaces are proposed which meets the standards set by London Plan policy T5 on the basis that the new school will provide capacity for 90 pupil places.

6.5.10 Short and long stay cycle parking is proposed to be located adjacent to the proposed area of car parking in the north-eastern corner the application site. This is a practical location for the cycle spaces and reflects the London Plan (see supporting text to policy T5) policy approach which seeks to provide short-stay spaces within 15-metres of a site's main entrance wherever possible. Locating short and long stay spaces near the entrance will provide convenience for all users.

6.5.11 Please see full details of car and cycle parking standards and proposed spaces to be provided within the Transport Statement.

#### *Highway Impact*

6.5.12 The access and movements strategy has been designed to reduce impact of the development on the local highway network. The Transport Assessment has concluded that impacts arising from the development require implementation of mitigation measures as follows:

ATC surveys undertaken on Northwood Road identified that 85th percentile vehicle speeds were in excess of the 30mph speed limit causing a road safety concern. To address this, a 20mph zone is proposed on Northwood Road within the vicinity of the site to reduce vehicle speeds and improve road safety to all users.

6.5.13 Due to the constrained nature of the site only 26 staff car parking spaces can be provided. To avoid staff car parking overspill onto the local highway network causing possible congestion and parking stress, 10 car parking spaces are expected to be secured by a prior agreement with Harefield Academy.

6.5.14 Due to the pupil requirements of the school, the need for pupils to be dropped-off and collected, by vehicles within a secure environment within the school site is recognised. Due to the limited space on site and pupil drop-off/ collection requirements, not all

vehicles will be able to be accommodated on-site and could result in vehicle overspill, queuing onto the local highway network and parking stress on surrounding residential streets. To resolve this issue drop-off and collection by private car and taxi will be accommodated within the existing Harefield Academy car park via a prior agreement with Harefield Academy.

6.5.15 Traffic volumes are proposed to increase at the Harefield Academy car park access as a result of the development proposals. Site observations and survey results highlighted that pedestrians use the vehicular access to the site.

6.5.16 With the mitigation strategy in place, it is considered that the transport impacts of the development have been addressed and the development should be considered acceptable in transport and highways terms. The development is considered to comply with NPPF Paragraphs 110 and 111, London Plan policies T4, T5 and T6 as well as Local Plan policies DMT 1, DMT 2, DMT 5, and DMT 6.

## 6.6 Arboriculture

6.6.1 Provided with the application is an Arboricultural Impact Assessment (AIA) and Method Statement (AMS) along with a supporting Tree Protection Plan (appendix 9). Additional information in relation to the landscape proposals are provided in landscape pack (drawing ref: 1468-HFD-HED-ZZ-XX-DR-L-1003 Rev A01).

6.6.2 As summarised in **Table 6.5** below, the proposed development will require the removal of 19 trees on site, however, to compensate 20-30 trees (c. 2-3 metres high) will be planted in the construction phase and regularly maintained for 5 years until well established.

**Table 6.5 - Summary of Existing Trees at the Application Site**

Tree Category	No. of trees	%
A	7	25
B	13	46
C	8	29
Total	28	

6.6.3 This meets the requirements of policy DMBH14 which identifies that where existing trees are proposed to be removed replanting on-site is recommended. London Plan policy G7 which requires adequate replacement is also complied with. Details of the location of trees to be retained and removed can be identified in the submitted Tree Protection Plan. The extent of the proposed planting in the landscaping scheme ensures that principles of good design set out in policy DHMB 11 are adhered to.

**Table 6.6 – Treatment of the Trees on the Application Site**

Tree Category	Retained	%	Removed	%
A	7	78	0	0
B	0	0	13	68
C	2	22	6	32
Total	9		19	

**Table 6.7 – Tree Summary of the Application Site**

Action	No. of Trees
Existing Trees	29
Trees Removed	19
Trees Proposed	20-30

## 6.7 Ecology

6.7.1 The submitted Preliminary Ecological Appraisal ('PEA') confirms that a number of habitats on the site are of low-negligible ecological importance. Due to the likely absence of roosting bats no impacts are predicted on this European Protected Species.

6.7.2 Despite the loss of some existing habitats, the proposed landscaping scheme and planting strategy will create new areas for wildlife in addition to the biodiversity benefits associated with the proposed sedum green roof. It is considered that the proposals align with policy EM7 of the Local Plan Part 1 in this regard. Policy DME1 7 of the Local Plan Part 2 is also satisfied as it is considered unlikely that the proposals will give rise to significant harm to biodiversity - additional surveys are required to determine impacts on some species.

## 6.8 Fire Safety

6.8.1 The submitted Fire Safety Statement ('FRS') (Hoare Lea) addresses the requirements of London Plan policies D5 and D12 which seek to ensure that all development proposals achieve high standards of fire safety. Regard has also been had to BB100 non-statutory guidance on fire safety for schools.

6.8.2 The FRS provides details of the approach relating to fire safety for the proposed school expansion. The FRS describes how the building will function in terms of the building construction and regard has been had to other relevant considerations of London Plan policy D12. The existing building is a cross laminated timber (CLT) structure, which is proposed to be retained for the school building and a suitable fire vehicle access to the site is displayed within the report (figure 2). It is proposed that the fire strategy will be further developed following submission of the application in conjunction with the LPA.

## **6.9 Energy, Sustainability and Climate Change**

- 6.9.1 As described in the submitted Sustainability Report the energy source of the existing building is gas boilers. In line with London Plan hierarchy detailed in policy SI2, low carbon technologies have been introduced on the site where feasible to enhance the sustainability credentials of the development.
- 6.9.2 This includes the use of Photovoltaic panels ('PV') and new Green Roof which will achieve energy saving benefits such including the reduction of urban heat island effect. The use of Air Source Heat Pumps (ASHP) is also proposed which provides an additional carbon saving measure and is supported by Policy SI3. The heat retention of the building will be enhanced by the building design, securing a reduction in "U" values.
- 6.9.3 It should be noted that Local Plan Part 1 policy EM1 gives preference to previously developed land to avoid the loss of green areas. The application site is wholly previously developed, and the enhanced areas of landscaping and the proposed wildflower/sedum green roof will create additional green areas on site.
- 6.9.4 In terms of water usage, the proposals will seek to limit water consumption to less than 125 litres per person per day in line with the requirements of London Plan policy SI 5.

## **6.10 Flooding**

- 6.10.1 The Flood Risk and associated Drainage Strategy ('FRDS') submitted with this application confirms that the entire site is located within Flood Zone 1 and the probability of groundwater risk to the site is low (>25%). This meets the requirements of strategic policy EM6 which directs development away from areas of flood risk.
- 6.10.2 The Drainage Strategy for site is shown on submitted drawing 500 Rev P02. It is considered that with appropriate mitigation the site will not be subject to significant flood risk. Proposed levels will ensure that in the unlikely event of a system failure the site will remain protected.
- 6.10.3 In terms of surface water run-off, a positive surface water drainage system will ensure that the maximum discharge up to a 100-year storm event with allowance for climate change (40%) is restricted to 5l/s. This is a betterment of 85% compared to the existing flow rate, satisfying the requirements of policy DMEI 10 which stipulates that all major new build developments are to be designed to reduce surface water run-off rates to no higher than the pre-development run-off rate.
- 6.10.4 An assessment of Sustainable Drainage Systems considered for the proposed development are set out in Table 3 of the submitted FRDS. This indicates some of the measures including a Green Roof which have been incorporated on the site where appropriate in line with Policy DMEI 10. Moreover, the use of porous paving for the proposed car parking area is supported by part C of London Plan policy SI 13.

## **6.11 Noise**

6.11.1 An Acoustic Design Report (Sharps Redmore) has been submitted with this application which provides the results of environmental noise surveys conducted on the site based on specific measurement locations.

6.11.2 It should be noted that unlike the former residential boarding use of the existing building, the proposed Special School will only be access during daytime hours which will mitigate noise impacts on properties along Northwood Road in the evening hours.

6.11.3 Noise incident upon the school is mainly from local road traffic. The survey and assessment indicate that a mix of a naturally ventilated and a hybrid ventilated façade would be most suitable for the proposed development to meet the internal noise criteria. An assessment has been made of the proposed external play/teaching areas and car park/drop off zone, and concludes that this will not cause a significant impact due to the existing noise levels and distances to receivers. The acoustic assessment indicates that the proposed scheme is not likely to give rise to significant impacts on the noise sensitive receivers, and the site can accommodate the proposals without significant noise control measures being required. Therefore, it is considered that the proposed development complies with London Plan policies D13 and 14 and Local Plan Policy EM8.

## 7. Conclusions

7.1 This Planning Statement has provided a detailed assessment of the proposed development against the relevant national and development plan policies. As a result of this assessment, the following conclusions can be drawn:

- The application site is a suitable site for a new school and will provide a beneficial use on a site which is presently underused by Harefield Academy, a secondary school which is operating well below its capacity in terms of pupil places and therefore a logical site to meet the identified need for a new maintained special school in the borough.
- Whilst the site is covered by a Green Belt designation the proposals are appropriate development. The provision of a new school will largely re-use an existing building and the modest extension to it is not a disproportionate addition and will not give rise to a greater impact on the openness of the Green Belt.
- There are nonetheless several Very Special Circumstances which would justify the development were it deemed to be 'inappropriate' in Green Belt terms. These include the suitability of the site to accommodate dedicated PE areas and classroom spaces for SEND pupils, the compelling need for the development in light of the Borough and London-wide deficit in pupil places and the urgent requirement to provide school places that need to be re-provided for following the loss of modular units at Meadow High School.
- The proposal is compliant with the development requirements of the Hillingdon Local Plan (Parts 1 and 2), the London Plan and the relevant provisions of the NPPF. The principle of educational development can be supported in the context of the site being compatible with surrounding uses and the reconfiguration of sports pitches to provide a dedicated PE area for pupils at the special school supports Sport England's overarching objective to improve equality of access to sporting facilities for all regardless of age, background or ability.
- The development is to have a modified vehicular access and pick up and drop off point in place of an existing redundant access road built at the time of construction of the former boarding block. Describe dropped curbs/new egress to the east of the site. A dropped kerb crossing point is proposed providing access from the southern footway on Northwood Road to the northern footway at the site access. The proposed site access will also provide direct access to the staff and visitor car park.
- The development is proposed in an accessible location with the eastern boundary of the site along Northwood Road providing access to public transport and bus stops. A full assessment of the transport impacts is provided in the Transport Statement prepared by Robert West Transport Planners.

- The proposed development will require the removal of 19 trees on site, however, to compensate 20-30 trees (c. 2-3 metres high) will be planted in the construction phase and regularly maintained for 5 years until well established. This meets the requirements of policy DMBH14 which identifies that where existing trees are proposed to be removed replanting on-site is recommended. London Plan policy G7 which requires adequate replacement is also therefore complied with. Details of the location of trees to be retained and removed can be identified in the submitted Tree Protection Plan. The extent of the proposed planting in the landscaping scheme ensures that principles of good design set out in policy DHMB 11 are adhered to.
- The proposed landscaping scheme and planting strategy will create new areas for wildlife in addition to the biodiversity benefits associated with the proposed sedum green roof. It is considered that the proposals align with policy EM7 of the Local Plan Part 1 in this regard. Policy DMEI 7 of the Local Plan Part 2 is also satisfied as it is considered unlikely that the proposals will give rise to significant harm to biodiversity.
- An assessment of Sustainable Drainage Systems considered for the proposed development are set out in Table 3 of the submitted FRDS. This indicates some of the measures including a Green Roof which have been incorporated on the site where appropriate in line with Policy DMEI 10. Moreover, the use of porous paving for the proposed car parking area is supported by part C of London Plan policy SI 13.
- The Flood Risk and associated Drainage Strategy ('FRDS') submitted with this application confirms that the entire site is located within Flood Zone 1 and the probability of groundwater risk to the site is low (>25%).
- The acoustic assessment indicates that the proposed scheme is not likely to give rise to significant impacts on the noise sensitive receivers, and the site can accommodate the proposals without significant noise control measures being required. Therefore, it is considered that the proposed development complies with London Plan policies D13 and 14 and Local Plan Policy EM8.

7.2 The proposed development is considered acceptable in planning terms, and we would request that the LPA grant planning permission.

## LIST OF ACRONYMS

Acronym	Description
SEND	Special Educational Needs and Disability
SEN	Special Educational Needs
DSG	Dedicated Schools Grant
VSC	Very Special Circumstances
LPA	Local Planning Authority
NPPF	National Planning Policy Framework
DfE	Department for Education
ASD	Autism Spectrum Disorder
MLD	Moderate Learning Disability
MUGA	Multi-Use Games Area
SE	Sport England
LPA	Local Planning Authority
MHS	Meadow High School

## **Appendix 1 – Pre-Application Advice**

## MEETING MINUTES

**Client:** London Borough of Hillingdon  
**Project:** Harefield Academy Block/ Meadow High School Developments  
**Project number:** 4266  
**Meeting Title:** Pre-Application Planning Meeting  
**Meeting location:** Teams  
**Meeting date:** 03 Feb 2022 @ 2.30pm  
  
**Duration:** 1 hour 30 mins

**Attendees:**

James Rodger	LBH – Planning Team
Mandip Malhotra	LBH – Planning Team
Tom Campbell	LBH – Planning Team
Michael Briginshaw	LBH – Planning Team
Tim Martin	London Borough of Hillingdon
Bobby Finch	London Borough of Hillingdon
Sarah Phillips	London Borough of Hillingdon
Nav Minhas	London Borough of Hillingdon
Billy Palmer	Turnberry
Mark Clarke	Chadwick Dryer Clarke

**Apologies:**

Robin Dryer Chadwick Dryer Clarke

	ITEM	ACTION
0.00	<b>Introductions and Apologies</b>	
0.01	All parties were introduced by LBH.	
1.00	<b>Project Background</b>	
1.01	CDC outlined the agenda and meeting purpose to consider the planning issues surrounding two sites at Harefield Academy, Harefield and Meadow High School, Uxbridge. This is for the provision of new facilities and spaces for special schools in the borough.	
1.02	CDC presented a document intended to explain the background of the projects and also some of the key design ideas within the site contexts.	

## MEETING MINUTES

02.00	HAREFIELD ACADEMY SITE	
2.01	It was noted that since construction, the residential boarding block on the Harefield Academy site has been broadly unused.	
2.02	The relationship of the conversion of the residential block and the main Harefield Academy school building was discussed. In relation to the potential use of some Harefield Academy facilities by the new school, it was noted that the 'red line' for planning application purposes should be carefully considered.	All
2.03	LBH noted that Harefield Academy is currently under-utilized and there are reviews of the PAN of the school underway. PTLBH noted that any planning application should carefully reference school numbers.	LBH
2.04	It was noted that Harefield Academy was within the green belt, and therefore any proposals should align within the principles of the NPPF.	All
2.05	The reasons for the proposed two-storey extension to the residential boarding block to facilitate the special school were explained and reviewed in relation to the BIM model and site photos. It was noted by PTLBH that the proposed two-storey extension did not look 'egregious' next to the existing building and its discreet massing was broadly accepted.	
2.06	PTLBH noted consideration should be given to increased density of planting to the soft landscape 'buffer' to Northwood Road.	CDC
2.07	PTLBH noted that dimensions, volume and GIA calculations will be required as part of the application to indicate the limited size of the extension.	CDC/ TU
2.08	The external areas of the new school were discussed, and it was noted that an area of netball/ tennis courts adjacent to the residential boarding block are intended to become sub-divided to provide PE and play areas for the new school. A single netball/ tennis court is proposed to be retained by Harefield Academy.	
2.09	PTLBH noted that Sport England should be consulted early regarding the loss of these courts to Harefield Academy in relation to an understanding of Academy over-provision and after-hours community use. It was noted that this area would still be used for physical activity by the pupils of the new school.	CDC/ TU/ LBH

## MEETING MINUTES

2.10	TU queried the designated use of the residential boarding block, noted that it did not appear to have an explicit C2 use, and was it considered to have a use relating to the main school? PTLBH noted that the C2 use was referred to in the committee report but seemingly not within the consent. TU to clarify with PTLBH.	TU/PTLBH
2.11	CDC noted the potential use of the main school car park by school visitors and staff given its under-use. PTLBH stated that a draft travel plan should be submitted with the planning application, based upon parking surveys and projected journeys. The travel plan will need to consider both Harefield Academy and the new school.	LBH
2.12	CDC introduced the possibility of re-opening a redundant vehicular access directly from Northwood Road to the new school, which was used when the residential boarding block was under construction. All parties agreed that this could offer some benefits for the new school as it liberated external areas for the beneficial use of the pupils. The design team to explore and raise with LBH highways team.	CDC/ LBH
2.13	It was noted that the statutory definition of a major application will apply to the project if the development is in excess of 1000m2. It was noted that the extension is approx. 550-600sqm but if a change of use applies then this may trigger a major application.	TU
2.14	It was noted that the council may take a 25 year lease on the land, but there are options to bring the site back under the control of the council – LBH to confirm, as this may affect the S106 agreement.	LBH
2.15	TU outlined a series of surveys and reports that may be required to support the planning application. PTLBH noted that an ecology survey unlikely to be required given the low impact of the proposals. However, a tree survey and noise survey will be needed. TU to forward proposed list of application content for PTLBH agreement.	TU
2.16	PTLBH noted that invasive archaeological investigations also unlikely given the prior development of the site – the planning conditions to the original residential boarding block and Harefield Academy should be investigated and a desktop report put in place if this is not conclusive.	TU
2.17	CDC queried whether the installation of PVs on the existing building/ extension would be a problem in terms of planning policy. PTLBH noted that improvements to energy problems are welcomed across the borough.	CDC

## MEETING MINUTES

3.00	MEADOW HIGH SCHOOL	
3.01	CDC outlined the need for a new building to provide good quality facilities to replace redundant 'huts' on the site which are beyond their working life and require replacement. This will also increase the pupil capacity of the school by 8-10 pupils only.	
3.02	It was noted that the proposed new-build classroom block will be two-storeys high (similar to other buildings on the site) and split at ground floor to maintain circulation around the school site and the useable external playing surface.	
3.03	PTLBH noted that given the building was not higher than the adjacent 6 <sup>th</sup> form block, and did not project further to Benson Close than the existing block, this did not seem to greatly impact on neighbour amenity. It was noted by PTLBH that the area adjacent to Benson Close should be well-screened with soft landscaping/ trees, and that it was a benefit to split the ground floor plan to prevent pupils having to circulate around the building near Benson Close.	
3.04	The provision of an 'undercroft' was queried, but LBH/ CDC noted that from their experience covered external areas are well-liked and used by pupils within school sites.	
3.05	It was noted that this application is very likely to trigger a major application given the floor area of the new building is projected to be 1600-1700 sqm.	CDC/ LBH
3.06	PTLBH suggested reference to the London Plan regarding sustainability requirements for the project.	
3.07	It was noted that construction-phase access could realistically only come from Peel Way given the recent redevelopment of the site by DfE. PTLBH strongly suggested early planning of construction methodology and engagement with neighbours, and noted that hours of operation conditions could be applied depending on outcomes.	CDC/ LBH
	NEXT MEETING	
4.00	Next Meetings	
4.01	It was agreed that a further pre-app meeting should take place in early March to review the developing proposals.	LBH

## **Appendix 2 – Appeal Decision on Green Belt Openness**



## Appeal Decision

Hearing Held on 12 November 2019

Site visit made on 12 November 2019

**by Jonathan Price BA(Hons) DMS DipTP MRTPI**

**an Inspector appointed by the Secretary of State**

**Decision date: 15 November 2019**

**Appeal Ref: APP/R5510/W/19/3229922**

**Heathrow Service Station, Shepiston Lane, Hayes UB3 1RW**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Mr Tom Jeremiah (Euro Garages Limited) against the decision of the Council of the London Borough of Hillingdon.
- The application Ref 17981/APP/2018/504, dated 9 February 2018, was refused by notice dated 21 December 2018.
- The development proposed is demolition of existing car wash, development of drive-thru coffee shop (Use Class A1), alterations to existing petrol filling station forecourt, plus car parking, landscaping and other associated works.

### Decision

1. The appeal is allowed and planning permission is granted for demolition of existing car wash, development of drive-thru coffee shop (Use Class A1), alterations to existing petrol filling station forecourt, plus car parking, landscaping and other associated works at Heathrow Service Station, Shepiston Lane, Hayes UB3 1RW in accordance with the terms of the application, Ref 17981/APP/2018/504, made on 9 February 2018, subject to the conditions set out in the Schedule attached to this decision.

### Procedural Matters

2. The description of the development proposed is taken from the appeal form. This is because the application was amended prior to the Council's decision, with the deletion of an originally proposed drive-thru restaurant (Class A3).
3. Sufficient information has now been provided in relation to the highways impact of the drive thru coffee shop, demonstrating that the proposal would not result in increased traffic movements and queuing to the detriment of public and road safety. As a consequence, the Council's second reason of refusal has fallen away, leaving only that found in respect of Green Belt policy.

### Main Issue

4. Whether the proposal would be inappropriate development in the Green Belt having regard to the National Planning Policy Framework (the Framework) and any relevant development plan policies.

## Reasons

5. The existing service station is located within the Metropolitan Green Belt. The site is alongside the M4, with access onto Shepiston Lane which links to junction 4 of the motorway. Heathrow airport is nearby. The southern part of the site comprises a bund separating the service station from the motorway. On the other side of Shepiston Lane there is a cemetery, with a haulage depot next to that. A modern hotel is adjacent the service station. Other than these developments and the surrounding road infrastructure, the appeal site is surrounded mainly by open fields, which separate it from the developed urban areas beyond.
6. The main issue relates principally to the replacement of the car wash with the larger drive thru coffee shop, along with the extended hardstanding areas of associated car parking and access, rather than the more minor alterations to the filling station forecourt.
7. The drive-thru coffee shop would result in a moderately larger building and its associated access and car parking would extend the area of existing hardstanding into part of the mown grassed area around the car wash installation. Beyond this grassed area, a line of trees and bushes occupy raised land marking the extent to the operational part of the service station site. There would be a slight incursion within this clearly-defined landscaped area to the east, mainly as a result of an extended service road. However, the development proposed would be mainly confined to the level area accommodating the existing operations and enclosed within the raised landscaped areas to the south and east.
8. The Framework establishes the Government's fundamental aim in respect of the Green Belt. This is to prevent urban sprawl by keeping Green Belt land permanently open; the essential characteristics being its openness and permanence. To this end, inappropriate development is deemed by definition harmful to the Green Belt and not to be approved except in very special circumstances.
9. Paragraph 145 of the Framework establishes the construction of new buildings as inappropriate in the Green Belt, apart for a number of exceptions, of which part g) is most relevant in this case. This considers as not inappropriate a proposal which might comprise limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development.
10. Infilling is not defined in the Framework but is commonly understood to be the development of a small gap in an otherwise built-up context. The proposal would arguably be infill within, and certainly comprise the partial redevelopment of, the service station site. I consider the appeal site to meet the Framework definition of previously developed land. This is land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. Although this definition is qualified not to assume the whole of this curtilage should be developed, I nonetheless judge this scheme to comprise the partial or complete redevelopment of previously developed land, in continuing use by virtue of being part of an operational service station. To be considered as not

inappropriate in the Green Belt under the Framework, this proposal therefore needs to be found not to have a greater impact on its openness than the existing development.

11. Whilst the Framework is a material consideration to which I must attach significant weight, my starting point is the development plan. Paragraph 213 of the Framework makes it clear that existing development plan policies should not be considered out-of-date simply because they were adopted prior to its publication. However, saved policies OL1 and OL4 of the Borough's Unitary Development Plan<sup>1</sup> predate the Framework by a number of years and reflect the much earlier national Green Belt policy of Planning Policy Guidance 2. I therefore give these policies limited weight, giving a greater amount to Policy EM2 of the Part 1 Hillingdon Local Plan<sup>2</sup> and Policy 7.16 of the London Plan<sup>3</sup>. These apply national policy and thus are entirely in line with the Framework.
12. The appellant has submitted the quite recent *Euro Garages* High Court judgement<sup>4</sup> which provided interpretation of the sixth bullet point of paragraph 89 of the 2012 Framework, now superseded by paragraph 145 g) in the current 2019 version. This sixth bullet of paragraph 89 had included reference to the purpose of including land within the Green Belt. Although this is no longer in replacement paragraph 145 g), I find this proposal not in conflict to any material degree with any of the five purposes ascribed to the Green Belt in paragraph 134 of the Framework. These are to check the unrestricted sprawl of large built-up areas, prevent neighbouring towns merging into one another, safeguard the countryside from encroachment, preserve the setting and special character of historic towns and assist in urban regeneration.
13. In respect of the question of impact on openness, the *Euro Garages* judgement found that the context for this should relate to the Green Belt generally rather than be confined to the development site itself. The decision ruled that a greater impact on openness than the existing development must be assessed on the basis of a consideration of harm, rather than simply of change. In this case there is no dispute that the drive-thru coffee shop would create a larger building, with a greater extent of hardstanding and an increase in vehicular and other activity. In this regard, there would be a loss of openness to the Green Belt in a spatial sense, through the increase in built footprint, and also in a visual sense with the somewhat larger building and resulting change to the street scene.
14. However, the development would be contained within the landscaped bunds and be viewed in the context of the existing service station, that includes the larger filling station shop and prominent extent of canopy over the fuel pumps. As a consequence, there would be limited harm to the wider Green Belt in respect of diminishing its spatial extent beyond the existing service station site. The buildings proposed would be of a design appropriate to the service station context and the slightly larger size of development would lead to very little harmful loss of Green Belt openness in any visual sense.

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<sup>1</sup> London Borough of Hillingdon Unitary Development Plan (adopted 1998) Saved Policies 27 September 2007

<sup>2</sup> Hillingdon Local Plan: Part 1 – Strategic Policies (Adopted November 2012).

<sup>3</sup> The London Plan March 2016

<sup>4</sup> (*Euro Garages Ltd v SSCLG & Anor* [2018] EWHC 1753 (Admin)

15. The restrictive policies over development within the Green Belt may have an incidental role in preserving the quality of an undeveloped landscape. However, the inclusion of land within Green Belt is not necessarily indicative of scenic merit or visual high-quality. Neither does the surrounding Landscape Character Type, in this area defined as Harlington Open Gravel Terrace, necessarily indicate a particular quality of landscape. In this area the undeveloped land is of a level and open nature which, as protected through inclusion in the Green Belt, provides valuable relief to the adjacent built up urban areas. However, set within the confines of an existing service station and adjacent to a motorway, this proposal would have a quite negligible effect on the overall character of the surrounding landscape. The development would cause little harm to the Green Belt in respect of having a materially greater impact on its openness than the existing development.
16. I have had regard to the decisions submitted by the Council in regard to developments dismissed on appeal<sup>5</sup> recently at Cherry Yard, West Drayton. However, it remains appropriate I determine this appeal on its individual merits and also in the light of the interpretation of Framework policy provided in the more recent *Euro Garages* High Court judgement. I conclude that the proposal would, for the reasons given, be not inappropriate development within the Green Belt and as such would comply with Policy EM2 of the Local Plan, Policy 7.16 of the London Plan and part 13 of the Framework.

### **Conditions**

17. Paragraph 55 of the Framework states that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. I have considered the conditions agreed in the Statement of Common Ground in the context of this.
18. In addition to the standard condition imposing a time limit for commencement, another is necessary for certainty which specifies the approved plans. Given the nature of development permitted, a condition is necessary requiring on-site litter management to be agreed. A suitable condition is necessary in the interests of addressing any site contamination issues. Hard and soft landscaping measures form part of the approved details but conditions addressing tree protection measures and planting implementation are nonetheless required. A final condition is needed to ensure the Council's requirements for accessible parking and car charging points are met. I am not persuaded over the necessity for conditions limiting the erection of further buildings beyond those allowed or over the burning of waste materials on site.

### **Conclusion**

19. For the reasons set out above, I conclude that the appeal should be allowed.

*Jonathan Price*

INSPECTOR

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<sup>5</sup> APP/R5510/W/17/3186946 and 3186942

## **APPEARANCES**

### **FOR THE APPELLANT:**

Tom Jeremiah	Euro Garages Limited
Sarah Butterfield	WYG

### **FOR THE LOCAL PLANNING AUTHORITY:**

Stephen Volley	Council of the London Borough of Hillingdon
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## **DOCUMENTS SUBMITTED TO THE HEARING**

- 1 Court of Appeal decision in Turner v SSCLG & East Dorset Council [2016] EWCA Civ 466.

## **SCHEDULE OF CONDITIONS**

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
2. The development hereby permitted shall be carried out in accordance with the following approved plans: Drawing Nos.: 0915-EG-3915: Shepiston Way, 1 of 2; 0915-EG-3915: Shepiston Way, 2 of 2; 1377-9d: Planning Site Layout; 1377-10d: Planning Sheet 1; 1377-11c: Planning Sheet 2; 1377-12: Drive-Thru Coffee Shop Plans and Elevations ; 1377-14a: Existing PFS Plans and Elevations; 1377-15b: Site Elevations Sheet 1; 1377-16b: Site Elevations Sheet 2; 1377-17: Location Plan; 3595.01B: Landscape Layout and 3595.02B: Landscape Layout.
3. The drive-thru coffee shop (Use Class A1) shall not operate until a scheme detailing the method of disposal, storage and collection of litter and waste materials, generated by the business and/or discarded by patrons, has been submitted to and approved in writing by the local planning authority. The details shall include a description of the facilities to be provided and the methods for collection of litter within the premises. The approved scheme shall be implemented in full thereafter.
4. No development shall commence until a preliminary risk assessment report is submitted to and approved in writing by the local planning authority. This report shall comprise: a desktop study which identifies all current and previous uses at the site and surrounding area as well as the potential contaminants associated with those uses; a site reconnaissance; and a conceptual model indicating potential pollutant linkages between sources, pathways and receptors, including those in the surrounding area and those planned at the site; and a qualitative risk assessment of any potentially unacceptable risks arising from the identified pollutant linkages to human health, controlled waters and the wider environment including ecological receptors and building materials. All works must be carried out in compliance with and by a competent person who conforms

to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

5. No site clearance, preparatory work or development shall take place until a scheme for the protection of the retained trees (the tree protection plan) and the appropriate working methods (the arboricultural method statement) in accordance with paragraphs 5.5 and 6.1 of British Standard BS 5837: Trees in relation to design, demolition and construction - Recommendations (or in an equivalent British Standard if replaced) shall have been submitted to and approved in writing by the local planning authority. The scheme for the protection of the retained trees shall be carried out as approved.
6. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the buildings or the completion of the development, whichever is the sooner; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.
7. Notwithstanding the plans approved, the drive-thru coffee shop (Use Class A1) shall not operate until vehicle electrical charging points and accessible parking spaces have been provided in accordance with details that shall have first been submitted to and agreed in writing by the local planning authority.

**ENDS**