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Date: 16/11/2023

Mr. Michael Briginshaw  
Planning, Regeneration and Environment  
Central Services  
Hillingdon Council  
UB8 1UW

Dear Michael,

**RESPONSE TO STAGE 1 GREATER LONDON AUTHORITY FEEDBACK  
DEMOLITION OF FORMER RESIDENTIAL SCHOOL AND ERECTION OF ACADEMIC BUILDING  
(USE CLASS F1), LORD ADONIS HOUSE, HAREFIELD ACADEMY UB9 6ET**

I write further to comments received from the Greater London Authority (GLA). We are instructed by London Borough of Hillingdon to submit additional information related to the above planning application pending determination under reference 17709APP/2023/2673.

We are grateful for feedback received from the GLA which is overall supportive of the proposed scheme, but additional information and clarifications have been requested in order to demonstrate compliance with relevant provisions of the London Plan. Therefore, this Cover Letter sets out responses to the queries raised, and where appropriate, where revised technical information has or will be submitted to satisfy GLA requirements.

The following Table sets out where supplementary information has been provided or where existing reports will be updated to address comments received from the GLA in their Stage 1 Report.

*Table 1 – Updates to Technical Reports*

| Document Name   | Author            | Action  |
|---|-------------------|---|
| Transport Technical Note - 15 <sup>th</sup> November 2023   | Robert West       | Supplementary Note                                    |
| Whole Life Carbon GLA Memo - 23 <sup>rd</sup> October 2023  | Hydrock           | Supplementary Note (Addendum WLC report to be issued) |
| Circular Economy GLA Memo - 20 <sup>th</sup> October 2023   | Hydrock           | Supplementary Note (Addendum CE report to be issued)  |
| Design Note GLA Response 1 – 15 <sup>th</sup> November 2023 | Noviun Architects | Supplementary Note                                    |

For ease, we summarise responses to matters raised in the Stage 1 Report under the following headings:

## Site Layout, Materials and Design

Comments have been raised by the GLA in respect of site layout, materials and design. Request to justify the approach to site layout, including legibility of the main entrance and material choice and the layout of ancillary structures. Please refer to the design response prepared by Noviun Architects (Report titled 'GLA Response 1') which justifies the approach to site layout and proposed materiality of the new SEND school building. It is considered that the detailed design of ancillary structures can be resolved at discharge of conditions stage.

In addition to Noviun Architect's response report, it should be noted that SEND schools have specific requirements regarding legibility, security and transport arrangements which have informed our proposals. Paragraph 39 of the GLA's report highlights that constructing the replacement building in the same location as the existing building misses the opportunity to deliver improved access and legibility. The existing site is constrained by both its Green Belt location and the existing Harefield Academy school site. The proposed arrangement is optimum based on the existing location of the service road, ancillary parking, and the need to provide a sufficient and secure amount of BB104 standard MUGA space. Noviun's response addresses the additional comments.

## Landscape

*45/ "Although located within Green Belt land, the proposal includes a significant extent of sealed outdoor surfaces, including a new car park, access roads and play areas. The applicant should seek limit the use of sealed surfacing as much as possible, by limiting the extent of hard surfaces. Where hard surfaces are required, permeable surfacing should be deployed."*

The design of external spaces needs to ensure that sufficient hard surfacing for functional/play areas in order to not affect BB104 areas. The approach taken has been to accommodate hard surfacing within the site area without encroaching further into Green Belt land. Wherever possible, soft landscaping has been incorporated to ensure an appropriate balance is reached with BB104 requirements. The design proposes permeable paving and asphalt throughout the site, around the building and play spaces. However, this does not include the access road and parking area, but the direction of runoff will be directed into soft planting where achievable.

*46/ "In addition to the above, substantial natural nature-based solutions should be explored to integrate the proposed car park within its natural surroundings, and provide a natural barrier where car park operations could potentially harm the biodiversity of the surrounding Green Belt land. The Council should ensure an Impact Assessment is carried out to inform and support any mitigation measures."*

The planned parking area and spaces have been thoughtfully positioned in the same location as the existing parking area, which will be resurfaced to lessen the amount of cut and fill, in order to minimise the impact on the site. A substantial amount of planting and trees are proposed in and around the parking area to better integrate the hard surfacing with the surrounding landscape, and to create important connections to the existing green buffer area along Northwood Road. In order to facilitate tying into the site further, alternate, lighter tarmac colours are being explored. Additionally, castellated kerbs are being used to allow runoff into the planting beds where possible. It is considered that such detailed landscape design elements can be resolved as part of the final landscape scheme to be submitted under condition discharge.

## Fire Safety

*50/ "The draft Fire Statement demonstrates how the development proposal would achieve the highest standards of fire safety, including details of construction methods, means of escape, fire safety features, and means of access for fire service personnel. The Statement does not include details regarding the proposed materials. This information needs to be clarified by the applicant"*

An updated Fire Strategy was submitted to the Local Planning Authority (dated 20<sup>th</sup> September 2023) following the Stage 1 GLA Referral and has therefore not been reviewed as part of the Stage 1 Report. The updated report is considered to comply with provisions of London Plan Policy D12. Confirmation that the development will not incorporate combustible materials in its external walls will be provided to the Local Planning Authority to address this specific matter raised.

## Transport

Comments have been raised by the GLA in respect of transport matters, with requests for additional information regarding the space and quality of walking and cycling environment on the site. Whilst GLA officers note that the proposal complies with relevant parking standards in the London Plan, it is asked that consideration is given to exceeding these where possible. Please refer to Transport Technical Note - dated 15<sup>th</sup> November 2023 (Robert West) which addresses these matters raised in full.

## Sustainability

Further information is requested to address London Plan sustainability policies and the energy hierarchy (Policy SI2). Further details have also been requested in relation to Circular Economy principles through the provision of a re-development audit, pre-demolition audit and an Operational Waste Management Strategy. A revised Whole Life Carbon Assessment has been requested with adjustments required to adhere to the GLA WLC Template.

An updated Whole Life Carbon Assessment and Circular Economy Statement will be prepared in line with comments raised by the GLA. Comments have been added to the GLA Template setting out how these matters will be addressed in further reports to be submitted. This will include the provision of an updated Pre-Demolition Audit and an update to the report to account for waste arising from operational sources. Additional evidence will be provided to demonstrate technical reasons as to why refurbishment could not be completed, including information related to the structural performance of the existing building.

## Drainage

*84/ The drainage strategy proposes to restrict runoff to 5 l/s for the 100-year event plus 40% climate change. This is not supported; surface water run-off should be reduced to the greenfield runoff rate (QBAR = 2.11l/s based on total site area). Please note greenfield runoff rates should be calculated based on the impermeable area of the site only (5,367 sqm – as calculated in Table 4.1 of the Drainage Strategy), not the total site area.*

The applicant has sought to address feedback received by Hillingdon Council's third party drainage assessor during the planning application review undertaken on 21<sup>st</sup> September 2023, where the proposed discharge rate of 5.0 l/s was considered suitable. The requirement should be clarified. It is considered that the discharge rate is acceptable.

*86/ Rainwater harvesting, and green roofs should be provided to satisfy the requirements of Policy SI.13. The applicant should revise the drainage strategy to incorporate a range of SuDS to provide the required water quantity, quality, biodiversity, and amenity benefits. All drainage features should be included on the Proposed Drainage Strategy General Arrangement Drawing in Appendix E of the Drainage Strategy.*

The design will be reviewed in co-ordination with the landscape and building architects, and other specialists to investigate the viability of providing a rainwater harvesting system(s) alongside the use of other sustainable drainage features currently deployed such as permeable surfaces, green roofing, and bioretention areas. A range of SuDS measures are proposed to ensure compliance with policy SI.13 and it is considered additional measures could be incorporated at discharge of condition stage.

*87/ The Flood Studies Report ('FSR') has been used in the estimation of rainfall for the drainage calculations. This is not supported. This method commonly underpredicts rainfall intensity, particularly in the London area. The latest FEH method should be used, and the drainage calculations updated.*

Drainage calculations will be updated to use FEH2 data as requested.

*90/ No information is provided as to the targeted Wat 01 credits for the non-residential uses on site. No information is provided as to how the water consumption targets are to be achieved.*

It is considered that the London Plan requirement at Policy SI 5 related to Wat 01 credits relates specifically to development proposals for commercial development which is not applicable to this application.

## **Biodiversity**

*98/ "It is recommended the applicant should provide an update to the biodiversity metric in accordance with Policy G6(D). If biodiversity net gain is not achievable on the site, the applicant should review opportunities for biodiversity offsetting in consultation with the borough".*

The scheme is being reviewed for the ability to achieve biodiversity net gain and any offset requirements, if required, will be established as part of a forthcoming BNG review. A technical note will be submitted to calculate achievable net gain.

*The applicant should provide an assessment of the potential impacts to the SINC, specifically construction impacts and indirect impacts of noise, shading and lighting (with reference to Paragraph 8.6.5 of the London Plan).*

In relation to the sites proximity to the nearby Sites of Nature Conservation Interest (SINCs) the development has sought to integrate soft landscape features including wildflower meadow planting in the area of the site to the north east closest to the SINC at Shepherds Hill House (which is separated from the site by the existing road network). It is considered the proposed landscape treatment and integration of soft landscaped features will be an improvement in landscape quality and management compared to the existing redundant hardstanding. Notwithstanding, lighting details and construction impacts can be specified at discharge of condition stage to minimise potential for impacts on biodiversity.

## **Conclusions**

The enclosed revisions have been prepared to respond to the further comments received from the Greater London Authority to application reference 17709/APP/2023/2673. It is considered that matters raised have been sufficiently addressed via supplementary reports as set out in Table 1 and in this Cover Letter. Addendum reports related to drainage and sustainability items (whole life carbon and circular economy) will be submitted shortly to satisfy GLA requirements in full.

In the meantime, should you have any questions, please do not hesitate to contact me.

Yours Sincerely,

**Billy Palmer** BA, MSc, MRTPI

**For and on behalf of Bidwells LLP**