



# Pinn River SEND School Planning Statement

Iceni Projects on behalf of  
Kier Construction on behalf of  
Department for Education

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# 1. INTRODUCTION

## Purpose of this document

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- 1.1 This Planning Statement has been prepared by Iceni Projects, for the applicant Kier Construction (on behalf of the Department for Education), in support of a full planning application submitted to London Borough of Hillingdon ('LBH'). The proposals are for a new Special Education Needs and Disabilities (SEND) school in Pinner. The site is the existing Grangewood School, Fore Street, Pinner (the 'Site').

## Background

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- 1.2 There is an established and growing need for SEND school places within this part of London Borough of Hillingdon. The existing Grangewood School operates as a primary school for students with severe learning disabilities and complex needs, including autism and multi-sensory impairment. The existing school building and facilities are over capacity, are becoming dated and fail to meet the educational needs of the students and staff. In order for the school to continue to deliver education for its students, a new school is proposed at this site. This will enable the existing site to better cater for their students, and to better accord with up-to-date Department for Education ('DfE') guidance.
- 1.3 In addition to meeting the needs of the existing school, the school will expand to accommodate students at the Royal National Institute of Blind People (RNIB) Sunshine House School in Norwood who have similar levels of educational needs.
- 1.4 The application site (red line boundary) includes part of the adjacent Ruislip Woods SSSI, although no development is proposed in this wooded area except for the replacement of the existing fence with a taller one.

## The Proposed Development

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- 1.5 The description of the development for which full planning permission is sought ('the Proposed Development') is as follows:
- "Demolition of existing school building construction of part-one, part-two storey Special Education Needs and Disability School (SEND) (Use Class F) of 5,413sqm GEA floorspace, together with associated landscaping, play space, access, refuse and recycling storage, car and cycle parking and associated works"*
- 1.6 The scheme will deliver new teaching accommodation for children with specialist and acute needs. By expanding teaching accommodation and choice for residents, the application should attract great weight, as identified by the NPPF.

- 1.7 The development also makes use of an existing school site in a sustainable location. The proposal is a high quality design, which meets a range of sustainability targets, including the provision of 10% Biodiversity Net Gain on the existing baseline position.
- 1.8 Given the specialist needs of the students, they are driven to school by minibus, which minimises any impact on the local road network. A robust and rigorous Travel Plan is also proposed to manage the impacts of staff travel patterns.

### **The Application Documents**

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- 1.9 This Planning Statement describes the Site and the Proposed Development, assessing it against relevant policy and guidance. In doing so, this Statement also summarises the findings of various supporting technical reports that accompany the application, including (but not limited to):
- Design and Access Statement; prepared by Noviun Architects;
  - Transport Assessment, prepared by Iceni Projects;
  - Landscape Strategy, prepared by Wynne Williams Associates;
  - Ecological Impact Assessment; prepared by Wynne Williams Associates.
- 1.10 This Planning Statement should be read alongside the suite of technical reports submitted with the application.



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## 2. DESCRIPTION OF THE SITE AND SURROUNDINGS

### The Site and Surrounding Area

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- 2.1 The land within the continuous solid red line in Figure 1.1 extends to approximately 0.65 hectares (ha) and is wholly located within the LB Hillingdon administrative boundary. The Site is situated approximately 1.9km northeast of Ruislip station, at Ordnance Survey (OS) National Grid Reference (NGR) TQ 099888.
- 2.2 The surrounding area to the north, northeast, west and southwest is woodland. Coteford Junior School is located immediately to the southeast and will remain in-situ and operational throughout the duration of the demolition and construction programme. Beyond Coteford Junior School is a residential area to the east and southeast.
- 2.3 Access to the Site is via Fore Street, in the east. This access is shared for both schools and out development proposals seek to ensure there is no significant detrimental impact for either school.
- 2.4 **Figure 1.2** shows the key environmental sensitivities surrounding the Site.
- 2.5 The Site lies within the Archaeological Priority Area ('APA') 'Ruislip Motte and Bailey', relating to medieval settlement of the area. The Site is located immediately adjacent to a Scheduled Ancient Monument (SAM) – Park Pale (1021402), a significant earthwork consisting of a park pale and ditch relating to an ancient deer park mentioned in the Domesday Survey of 1086.
- 2.6 The Site does not contain any heritage assets designated as being of national importance, such as listed buildings or Parks and Gardens of Special Historic Interest. Eastcote Village is located approximately 500m southeast. The Grade II listed The Woodman Inn is located approximately 550m east and the Grade II listed 19, Fore Street is located approximately 650m southeast of the Site.. A number of other Grade II listed buildings are located within 1km of the Site
- 2.7 There are no internally important sites within a 1km radius of the Site. Ruislip Woods National Nature Reserve (NNR) virtually surrounds the Site. The woods are also designated as a Site of Special Scientific Interest (SSSI), with parts classified as a Local Nature Reserve (LNR). Ruislip Woods holds a range of plant species, including "species strongly associated with ancient woodland", There are five non-statutory Sites of Importance for Nature Conservation (SINC) within 1km of the Site, the closest being Fore Street Meadows SINC, 300m from the Site. The other four are 0.9km from the Site, and include King's College Playing Field SINC, Vincent Hospital Meadows SINC, High Grove SINC and Haydon Hall Meadows SINC.
- 2.8 The Site is not located in an Air Quality Management Area (AQMA).

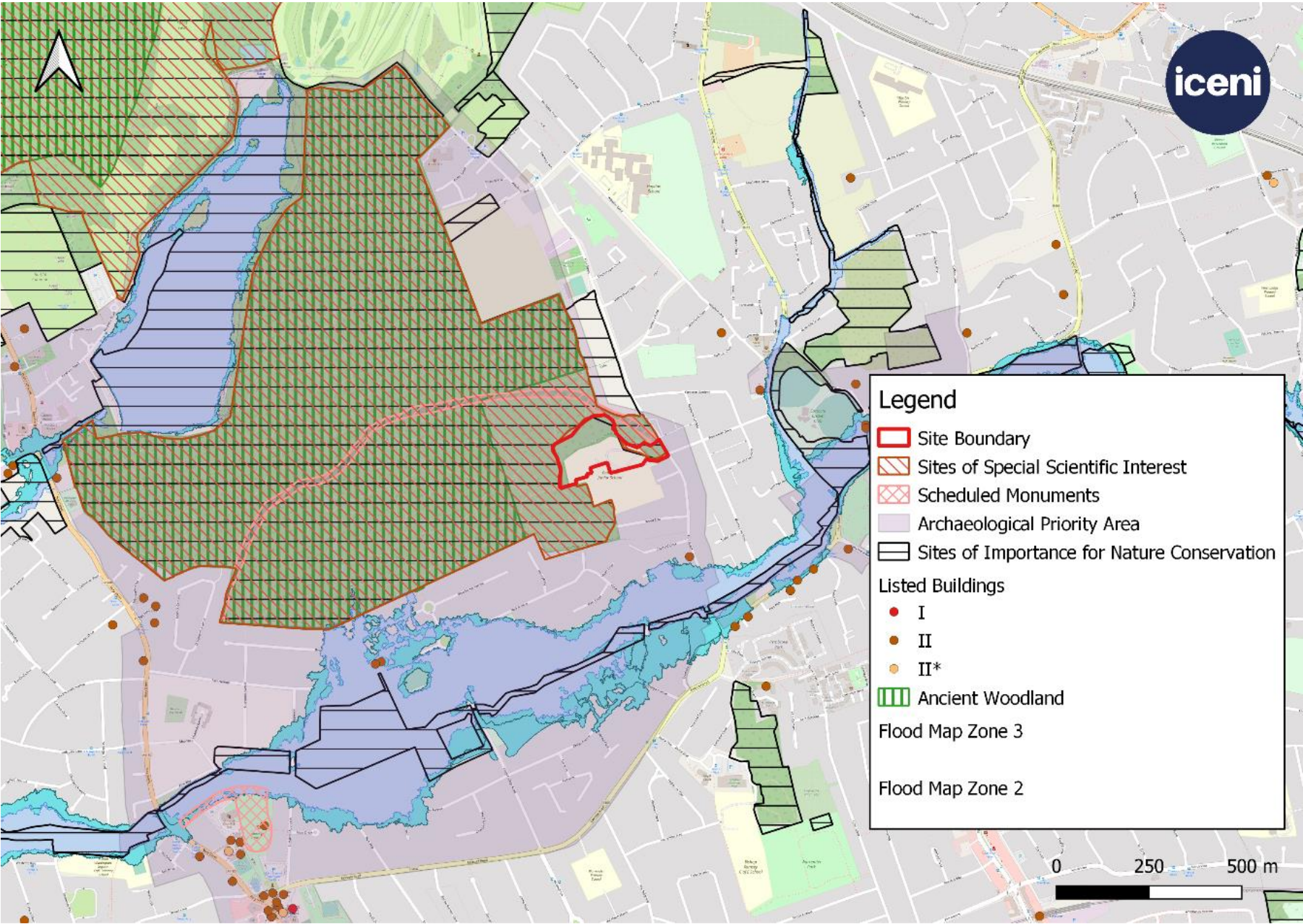
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- 2.9 The Site is located within Flood Zone 1. The Site is located within a Source Protection Zone 2 (Outer Protection Zone). The Site is underlain by bedrock geology of the Lambeth Group and Thames Group, classified as Unproductive Strata.

### **Existing School**

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- 2.10 Grangewood School comprises a single storey building of three 1970s/1980s blocks.
- 2.11 The school operates as a primary school for 100 students aged 3-11 with severe learning difficulties and complex needs, including autism and multi-sensory impairment. All students have an education, health and care plan. The school is part of the Eden Academy Trust and employs 70 members of staff.
- 2.12 The existing car parking provision is 72 spaces, which includes provision for the adjacent Coteford Junior School. Grangewood School is currently served by 15 minibuses, that drop off and pick up students with a differing level of specialist needs, each day. These minibuses drop off the students and leave the site before retuning in the afternoon to pick up students to take them home. These minibuses do not reside on the school site at any time.
- 2.13 The existing school has three permanent minibus parking spaces dedicated for the school's own minibuses. The current priority of the internal road circulates vehicles in a one-way clockwise direction.

Figure 1.2: Environmental Sensitivities



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### 3. CONSULTATION AND SCHEME DEVELOPMENT

#### **Pre-Application Engagement with LB Hillingdon Planning Officers**

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- 3.1 The Applicant has sought to maintain an open dialogue with Planning Officers at LB Hillingdon since the inception of the project.
- 3.2 The Proposed Development – described in full in Section 4 – has been the product of an iterative design process that has evolved through input from the Council, the Eden Trust and the Department for Education.
- 3.3 Two formal pre-application meeting were held with the Council, plus regular correspondence and meetings carried out between the Applicant and the Case Officer throughout the design process. The pre-application meetings were held with the Council in August and September 2022, following initial meetings with officers to discuss and agree a Planning Performance Agreement. At the pre-application meeting, the principle of development was discussed, as well as environmental sensitivities (including impact on trees and the SSSI) and car parking. The scope of the Transport Assessment has been discussed and agreed with LB Hillingdon in their role as the highway authority.

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## 4. PROPOSED DEVELOPMENT

### Proposed Development

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4.1 The Applicant is seeking consent for:

*“Demolition of existing school building and construction of part-one, part-two storey Special Education Needs and Disability School (SEND) (Use Class F) of 5,413sqm GEA floorspace, together with associated landscaping, play space, access, refuse and recycling storage, car and cycle parking and associated works”*

4.2 The proposals comprise demolition of the existing school building and removal of all adjacent external surfaces and equipment, to provide a new school. The existing minibus garage will be retained. Figure 1.3 shows the structures that will be retained or demolished.

4.3 The new school building has a larger footprint than the existing and extends further east and west. The new part one storey, part two storey SEND school will cater for students with severe or profound learning difficulties including autism (profound and multiple learning disabilities (PMLD) and autism spectrum disorder (ASD)/severe learning difficulties (SLD). The school will provide the full suite of teaching spaces, offices and dining facilities. The proposed building will measure 5,413sqm Gross External Area (GEA) and will accommodate 180 students from the ages of 4 to 19. The school will employ up to 130 (FTE) members of staff.

4.4 A permeable 24m\*15m asphalt Multi Use Games Area (MUGA) will be located in the south-west part of the school at ground floor. It will provide an area for more formal sports and will be enclosed by a 3m high weldmesh fence. Three internal courtyards will be provided at ground floor to meet the specific needs to students using classrooms directly adjacent to them.

4.5 A terrace on the first floor will accommodate an active play space, sensory garden and horticulture & outdoor learning area. The smaller break-out area on the eastern side of the building will be enclosed by a 1.2m high fence and will be accessible to staff only.

4.6 A new UKPN substation would be located at the entrance to the school site. The school would have a new sprinkler tank in a fenced enclosure, located to the north of the car park.

4.7 Highways improvements will comprise:

- Reconfiguring the car park for use by the school;

- 110 car parking spaces (including 38 spaces for Coteford School) which will comprise 107 standard car parking spaces and 3 disabled parking spaces;
  - 34 cycle parking spaces (for staff);
  - Minibus drop off/pick up facilities and parking for 7 minibuses;
  - Permanent parking for 3 minibuses; and
  - 6 active electric vehicle (EV) parking points.
- 4.8 There will be no further development within the woodland areas to the north and west of the Site, except for the replacement of the existing fence with a new taller fence to secure the site.
- 4.9 A full description of the design and layout of the Proposed Development is set out in the accompanying Design and Access Statement and should be read alongside this Planning Statement.
- 4.10 It is anticipated that the new school would open in 2025.

**Figure 1.3: Buildings/Structures to be retained or demolished**



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#### *Site Access*

- 4.11 The new school will utilise the existing vehicular access, along with the pedestrian / cycle access to the east of the site on Fore Street. The access point will be widened
- 4.12 It is expected that the priority of the internal road will change to a one-way anticlockwise direction around the central island. The change of priority is expected to rationalise the new parking layout and ensure that the one-way system operates more efficiently, and that vehicle parking is clearly more articulated on site.
- 4.13 A comprehensive Travel Plan, which has been discussed at length with LB Hillingdon, in their role as the highway authority, is submitted with the planning application.
- 4.14 Please refer to the Transport Assessment for further details.

#### *Appearance and Massing*

- 4.15 The building has been designed with recognition of the setting of the ecological constraints on site, and has drawn on the local architecture, character, and materials palate, which is reflected within the proposed facade treatment of the building. The colour palette for the proposed buildings are a result of the impact studies undertaken by the team.
- 4.16 A buff brick has been used throughout to complement the setting of the building adjacent to a densely wooded area, as it will blend into the background and weather well. Coloured window panels have been added to the windows in some places to created accents.

#### *Landscaping and Arboriculture*

- 4.17 A Chartered Member of the Landscape Institute assessed the Site's intended use and provided advice on intrusion of views and landscape. The primary objective of the external landscape design principles was the retention and protection of the mature tree canopy that surrounds the school. The dense tree coverage on the island will also remain undisturbed.
- 4.18 The landscape proposals, including the permeable MUGA, internal courtyards and first floor terrace are detailed above. These areas will be a mixture of artificial turf, ornamental planting and raised planters
- 4.19 Provided with the application is an Arboricultural Impact Assessment (AIA) and Method Statement (AMS) along with a supporting Tree Protection Plan. Additional information in relation to the tree removal proposals are provided in drawing refs FS0728-WWA-ZZ-ZZ-DR-L-0703 and 0704.
- 4.20 A total of 138 individual trees and 11 tree groups (including 67 trees) were included in the survey area. 70 individual trees and 5 tree groups will need to be removed to facilitate demolition of the

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school, expansion of the car park, construction of drop off facilities, regrading and external plant and equipment. There loss is unavoidable to deliver the expanded accommodation to meet the specialist educational needs of the children.

4.21 A further 11 individual trees will be subject to a more detailed review at the next stage of design development. Trees required for removal are a mixture of Category B, C and U. No Category A trees are required for removal. The scheme will make compensatory provision for the loss of trees in biodiversity terms, which will ensure that a Biodiversity Net gain of 10% will be delivered as part of the proposals.

4.22 Figure 1.4 shows the Landscape Masterplan.



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## 5. PLANNING POLICY CONTEXT

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that any determination made under the planning Acts (in this case the Town and Country Planning Act 1990), the determination must be made in accordance with the Development Plan unless material considerations indicate otherwise. Section 38(3)(b) clarifies that the Development Plan documents should be taken as a whole.
- 5.2 The Development Plan for the Site is as follows:
- London Borough of Hillingdon Local Plan: Part 1 – Strategic Policies (November 2012)
  - London Borough of Hillingdon Local Plan: Part 2 – Development Management Policies (January 2020); and
  - London Borough of Hillingdon Local Plan: Part 2 – Site Allocations and Designations (January 2020).
- 5.3 At the regional level, the London Plan (2021) is relevant.
- 5.4 Whilst the Local Plan is the starting point for considering the application, the Statement begins by considering national planning policy in the National Planning Policy Framework (and associated National Planning Practice Guidance (PPG)), which is a material planning consideration for all applications. The Department for Communities and Local Government ('DCLG') Policy Statement – Planning for Schools Development (M Gove and E Pickles, August 2011) policy statement confirms the Government's commitment to ensuring there is sufficient provision to meet growing demand for state funded school places.
- 5.5 The London Borough of Hillingdon commission 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
- 5.6 The SIP refers to 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.
- 5.7 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

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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).

- 5.8 The report notes that based on the number of children assessed as needing an ECHP 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 when in fact projections indicate an increase in children requiring an ECHP.
- 5.9 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.
- 5.10 In addition, the expanded site will accommodate children from the RNIB Sunshine House School, which further emphasises how this development will address an identified need.

#### **National Planning Policy Framework (2021)**

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- 5.11 Paragraph 7 of the NPPF highlights that the purpose of the planning system is to contribute towards the achievement of sustainable development. Associated Paragraph 8 explains that there are three overarching objectives to sustainable development which are interdependent and need to be pursued mutually supportive ways so that opportunities can be taken to secure net gains across these three objectives:
- *the economic objective:* to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
  - *the social objective:* to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services that reflect current and future needs and support communities' health, social and cultural well-being; and
  - *the environmental objective:* to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimise waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy.

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- 5.12 Paragraph 94 states that “it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should:
- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
  - b) work with schools’ promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.
- 5.13 Paragraph 111 is clear 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*”.
- 5.14 Paragraph 113 is also clear 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*”.
- 5.15 Paragraph 119 seeks for decisions to “*promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions*”.
- 5.16 Paragraph 123 sets out local planning authorities should support proposals which “*make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space*”.
- 5.17 Paragraph 122 sets out decisions should support development that makes efficient use of land, taking into account:
- “a) the identified need for [...]other forms of development, and the availability of land suitable for accommodating it;
  - d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
  - e) the importance of securing well-designed, attractive and healthy places”
- 5.18 Paragraph 126 states “*the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable*

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*development, creates better places in which to live and work and helps make development acceptable to communities.”*

5.19 Paragraph 130 states that “*planning 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 wellbeing, 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.”*

#### **Policy Statement – Planning for Schools Development**

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5.20 This policy statement published by the Department for Communities and Local Government in August 2011 confirms the Government’s commitment to ensuring there is sufficient provision to meet growing demand for state funded school places.

5.21 The statement goes onto to state that:

*“There should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework” and with regard to planning decisions “Local authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools”.*

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5.22 The statement sets out that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state funded schools and that the following principles should apply:

- There should be a presumption in favour of development of state-funded schools, as expressed in the National Planning Policy Framework.
- Local Authorities should give full and thorough consideration to the importance of enabling the development of state funded schools in their planning decisions.
- Local authorities should make full use of their planning powers to support statefunded school applications.
- Local authorities should ensure that the process for submitting and determining statefunded school applications is as streamlined as possible.
- A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority.
- Appeals against any refusals of planning permission for state-funded schools should be treated as a priority.
- Where a local planning authority refuses planning permission for a state-funded school, the Secretary of State will consider carefully whether to recover for his own determination appeals against the refusal of planning permission.

#### **London Plan (2021)**

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5.23 The Regional Planning Policy relevant to the Site is the London Plan (2021) which is the spatial development strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years.

5.24 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”*.

5.25 Policy GG1 (Building strong and inclusive communities) seeks to *“build on the city’s tradition of openness, diversity and equality, and help deliver strong and inclusive communities”* and those involved in planning and development must:

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- *“Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer and more equal city”;*
  - *“Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation”;*
  - *“Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish”;*
  - *“Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time”;*
  - *“Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements”; and*
  - *“Support the creation of a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation”*
- 5.26 Policy GG2 (Making the best use of land) encourages making the best use of land, including enabling the development of brownfield land and proactively exploring the potential to intensify the use of land for homes and workspaces by higher density development on well-connected sites.
- 5.27 Policy GG3 seeks to ensure that all new buildings are well-insulated and sufficiently ventilated to avoid health problems.
- 5.28 Policy D4 (Delivering good design) encourages masterplans and design codes to help bring forward development and ensure it delivers high-quality design and placemaking. At least one Design Review Panel for large schemes which meet the relevant criteria is also required during the preapplication stage. D5
- 5.29 Policy D12 (Fire Safety) is clear that *“all development proposals must achieve the highest standards of fire safety”*.

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- 5.30 Policy S1 (Developing London's social infrastructure) promotes new social infrastructure facilities (including community spaces) establishing that "new facilities should be easily accessible by public transport, cycling and walking".
- 5.31 Policy S3 (Education and childcare facilities) note LPA's should ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice by identifying sites for future provision through the Development Plan process. In particular, this should focus on areas with significant planned growth or need for school places and ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need.
- 5.32 Policy S4 (Play and Informal Recreation) requires development proposals that are likely to be used by children to incorporate good quality accessible play provision for all ages.
- 5.33 Policy SI 1 seeks to improve air quality and for proposed development to be air quality neutral.
- 5.34 Policy SI 13 (sustainable drainage) relates to the need to consider flood risk at all stages in the planning process and seeks the appropriate mitigation of surface water run-off through sustainable drainage systems in line with the GLA drainage hierarchy.

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### **LB Hillingdon Local Plan**

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- 5.35 The Hillingdon Local Plan comprises:
- London Borough of Hillingdon Local Plan: Part 1 – Strategic Policies (November 2012)
  - London Borough of Hillingdon Local Plan: Part 2 – Development Management Policies (January 2020); and
  - London Borough of Hillingdon Local Plan: Part 2 – Site Allocations and Designations (January 2020).
- 5.36 The Local Plan Part 1 – Strategic policies sets out the overall level and broad locations of growth up to 2026. Together with the Local Plan Part 2 Development Management Policies and Site Allocations and Designation documents, it forms the Council's future development strategy for the borough.

### **Part 1 Policies**

- 5.37 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:

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- SO6 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.
  - SO8 seeks to protect and enhance biodiversity to support changes to adapt to climate change and related to this SO11 which looks to address the impacts of climate change.
  - SO9 encourages healthier lifestyles through access to sports and recreation facilities.
  - SO18 looks to improve access to local services and facilities including educational

5.38 Policy BE1 requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods.

5.39 Policy CI1 seeks to ensure the provision of community and social infrastructure to cater for the needs of the existing community and future populations. The Council will resist the loss of community facilities; where the loss is justified the Council will seek to ensure that resulting development compensates these uses to ensure no net loss. The policy sets out 10 ways in which the Council will meet this need which include:

*“...2. Supporting the retention and enhancement of existing community facilities;*

*3. Supporting extensions to existing schools and the development of new schools and youth facilities;*

*4. Encouraging the development of multi-purpose facilities that can provide a range of services and facilities to the community at one accessible location; ...”*

5.40 Policy EM5 states that development proposals should ensure that sufficient children's play space is provided for new residential development, in accordance with national and local guidelines.

5.41 Policy EM6 requires that surface water run off is controlled to ensure the development does not increase the risk of flooding.

5.42 Policy EM7 seeks the protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plan and will (amongst other things) seek the provision of biodiversity improvements from all development, where feasible.

## **Part 2 Policies**

5.43 DMCI 1 Retention of Existing Community Sport and Educational Facilities

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- 5.44 DMCI 1A 'Development of New Education Floorspace' provides 4 criteria against which proposals for new schools and school expansions are assessed:
- Criteria A relates to the size, location and suitability of the site, to accommodate for the proposal and taking into account its compatibility with the surrounding area and policy considerations.
  - Criteria B relates to impact on open green space taking into account the area's character, existing open space provisions and whether the school has a sufficient provision for outdoor recreation and sporting activity.
  - Criteria C relates to the location and accessibility of the site in relation to transport and highways matters and the intended catchment area for the school.
  - Criteria D relates to building design contributing towards the requirement for schools to be zero carbon
- 5.45 DMCI 7 Planning Obligations and Community Infrastructure Levy seeks to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Planning obligations are sought on a scheme-by-scheme basis to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.
- 5.46 DMEI 1 Living Walls and Roofs and Onsite Vegetation states that all major developments should incorporate living roofs and/or walls into the development.
- 5.47 DMEI 10 Water Management, Efficiency and Quality seeks to address issues related to surface water in proposals for new development and ensure that water resources and water quality are maintained.
- 5.48 DMEI 14 Air Quality states that development proposals should as a minimum be air quality neutral, include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors both existing and new, and actively contribute towards the improvement of air quality especially within the Air Quality Management Area.
- 5.49 DMEI 2 Reducing Carbon Emissions seeks to ensure that new development proposals in Hillingdon contribute towards the reduction in carbon emissions and sets out the information that should be submitted to demonstrate how it will be achieved. In the event of a shortfall the policy allows for an off-site contribution to be made.
- 5.50 DMEI 6 Development of Green Edge Locations states that new development adjacent to the Green Belt, Metropolitan Open Land, Green Chains, Sites of Importance for Nature Conservation, Nature Reserves, countryside, green spaces or the Blue Ribbon Network should incorporate proposals to

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assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries.

- 5.51 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.
- 5.52 DMHB 11 Design of New Development states that all development should incorporate principles of good design, including landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.
- 5.53 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.
- 5.54 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.
- 5.55 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.
- 5.56 DMT 1 Managing Transport Impacts requires proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner by encouraging safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users and have no significant adverse transport or associated air quality and noise impacts on the local and wider environment.
- 5.57 DMT 2 Highways Impacts details that development proposals must ensure that safe and efficient access to the highway network is provided to the Council's standards. There should also be no contribution from new development to the deterioration of air quality, noise for local amenity or safety for all road users. New development should also provide safe, secure and convenient access

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facilities for cyclists and pedestrians. Mitigation measures should be included to address any traffic impacts in terms of capacity and functions of existing and committed roads.

- 5.58 DMT 5 Pedestrians and Cyclists states that developments are required to ensure safe, direct and inclusive access for pedestrians and cyclists on the site and connections to the wider network. This policy emphasises the retention and enhancement of existing pedestrian and cycle routes, the provision of a high quality and safe public realm and separating well signposted and attractive pedestrian and cycle routes from vehicular traffic, where possible.

### **Supplementary Planning Documents**

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- 5.59 Whilst not part of the Development Plan, there are numerous Supplementary Planning Documents ('SPD') for the Hillingdon area. Considered to be of relevance to the Proposed Development, and therefore a material consideration, are the following:

- Accessible Hillingdon SPD April 2013; and
- Planning Obligations 2014.

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## 6. PLANNING ASSESSMENT

- 6.1 This section of the Planning Statement assesses the proposals against the key planning considerations from the Development Plan, and the material considerations summarised above.

### **Compliance with Relevant Policy**

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- 6.2 It is considered that the Proposed Development accords with the LB Hillingdon Development Plan (when read as a whole). This means that the presumption in favour of the Development Plan, which is provided for by Section 38(6) of the Planning and Compulsory Purchase Act (2004), amounts in this matter to a (strong) presumption in favour of approving the proposals. It follows that unless material considerations indicate otherwise, planning permission should be granted. Far from indicating otherwise to the grant of permission, the material considerations lend very substantial further weight to permission being granted and in accordance with NPPF paragraph 11(c), this should be done without delay.

- 6.3 Compliance with the relevant policy, as set out in detail in the previous section, is considered below. The principal issues considered include:

- Principle of Improving Education Provision;
- Design and Massing;
- Trees and Ecology; and
- Transport.

### **Principle of Improving Education Provision**

- 6.4 All levels of planning policy place great weight on the need to improve education provision. The School has provided an excellent education for its students within the accommodation available to date, however, the School is keen to make improvements to improve capacity and better meet current DfE Guidelines. Its expansion will also accommodate students from the RNIB Sunshine House School, as such it is meeting identified need for places in the District.
- 6.5 The principle of education provision at the Site is established by the existing use, and as such the minor expansion of the School should be considered a sustainable and effective use of land. The need for improving the education provision is established in the DfE Guidelines. The Proposed Development is therefore in accordance with NPPF paragraphs 7, 94, 117, 121 and 122, and is clearly supported and encouraged by London Plan Policy 3.18 and London Plan Policy S3.

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6.6 The principle of delivering new education floorspace is also supported by SO6, which links to the delivery of policy C11. 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.

6.7 The enhancing of recreation facilities is supported by London Plan Policy 3.19. The new MUGA and will increase opportunities for play and informal recreation in accordance with London Plan Policy S4.

### **Design and Massing**

6.8 The School has worked hard to balance the needs of its students, DfE Guidance, neighbouring amenity, and the existing local context. The Proposed Development seeks to deliver this balance, while according with the aspirations of planning policy. It provides a much more efficient and considered layout, particularly in relation to vehicular movement and parking. The amendments also provide significant improvements to the internal layout of the existing School building.

6.9 The Proposed Development has carefully considered NPPF paragraphs 124 and 127, London Plan Policy 7.4, London Plan Policy D4 and DMHB 11, with a high-quality design, considerate of the surrounding local character – as is set out in detail in the Design and Access Statement.

6.10 While in a predominately residential area, the School, and many other local schools have been established in this part of Pinner for decades, and as such all form a significant part of its local context. In line with the aspirations of London Plan Policy 7.6 and London Plan Policy D3, the Proposed Development seeks to complement, but not necessarily replicate, the local character.

6.11 In line with London Plan Policy GG2 and DfE Guidance, the Proposed Development optimises the use of the Site, with the proposals bringing forward a more efficient, effective and accessible development for the school. These changes to the overall layout of the Site also enable the school to achieve the highest standards of fire safety, as required by London Plan Policy D12.

6.12 The height and footprint of the school is driven by the needs of the students. Many of whom have difficulties with stairs. A key aim of the design brief is to deliver the accommodation on the same level as far as possible, with staff support facilities on the first floor. This has meant that the footprint of the building has had to expand and thus some trees have been lost. The proposal balances the needs of the students with the most efficient use of land.

6.13 The proposals also involve the provision of specialist outdoor spaces for children, with an emphasis on sensory design. Again, a roof garden would not be appropriate due to the needs of the students.

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6.14 A new fence is proposed on the location of the existing one. The current fence is not tall enough to secure the site and so a taller fence is proposed. This expands the redline area of the school in to the SSSI, but not development is proposed here beyond the fence and where possible, existing fence will be used.

6.15 Further details on the design can be found within the Design and Access Statement.

### **Trees and Ecology**

6.16 As discussed previously, part of the site falls within a Local Nature Reserve and an SSSI. This element of the site will not be developed, aside from the replacement of a fence with a taller one, which is considered appropriate. The trees within the SSSI and Nature Reserve can be protected when the fence is erected by a method statement which could be conditioned.

6.17 The ecology survey indicates the presence of bats on the site, but alternative mitigatory habitat will be secured for them on site.

6.18 As discussed previously, the increased footprint of the site and the design brief means that some trees will need to be lost on site, but this is mitigated through the provision biodiversity improvements across the site and the net outcome will be a Biodiversity Net Gain of 10% after the development.

### **Transport**

6.19 NPPF paragraphs 109 and 111 are clear the development should not be prevented on highways grounds. It should be noted that there will be no significant additional movement generated by the Proposed Development. This is because the vast majority of children are picked up and dropped off by a minibus service. The proposal makes provision for the safe drop off and pick up of children from minibuses by staff (their care needs mean they need to be accompanied for activities such as this).

6.20 The existing driveway from Fore Street will remain in situ, to enable adequate provision for deliveries, servicing and emergency access in accordance with London Plan Policies T6 and T7. A Construction Management Plan is submitted as part of this Application.

6.21 A Travel Plan is provided as part of this application. The Pinn River School parking will be constrained so the aim of the TP is show new and existing staff living within 2 to 5 miles of the school they have a viable alternative option. By providing incentives and opportunities at Northwood Hills underground station to provide a minibus and Eden bikes to and from the Pinn River School is a clear indication that the TP will make a difference to the sustainable option being offered through the TP measures.

6.22 The existing car park is used by both Grangewood and Coteford Schools. The proposals will ensure that there is no loss of provision for the Coteford School through a Car Parking Management

Strategy. The focus of the Travel Plan is therefore to ensure that the staff car parking demand of the new Pinn River School is managed.

- 6.23 The Section 106 agreement will secure the delivery of the Travel Plan and monitoring of it. This provides comfort that the targets proposed within this document will be met.
- 6.24 Further details on transport can be found in the submitted Transport Statement and Travel Plan.

### Summary of Compliance with Relevant Policies

- 6.25 The previous sections highlight the main policies for consideration in relation to this application. The following section provides a summary of all applicable policies and how they are met.

**Table 1.1: Compliance with Relevant Policies**

Policy	Policy met?	Commentary
<b>London Plan Policies</b>		
Policy GG1 Building strong and inclusive communities	Yes	The proposed development would deliver a new SEND school better able to cater to pupils' needs and accord with current DfE guidance on capacity.  The proposed development would also provide pedestrian/cycle improvements, significant new landscaping, and a sustainable, high quality building.
Policy GG2 Making the best use of land	Yes	The proposed development would reuse the site of an existing SEND school to deliver a sustainable, higher quality school and grounds with increased capacity and improved pedestrian/cycle links.
Policy GG3 Creating a healthy city	Yes	The proposed development has been designed to improve pupils' access to green spaces, gardens, play areas, and sports facilities. The landscaping has been designed to meet the specific needs of pupils using classrooms directly adjacent to them. The proposed development includes a sensory garden and horticulture and outdoor learning area.
Policy D4 Delivering good design	Yes	The proposed development has been designed with recognition of the setting of the SSSI, and has drawn on the local architecture, character, and materials palate, which is reflected within the proposed façade treatment of the building.
Policy D12 Fire Safety		The planning application is supported by a Fire Safety Strategy, which documents the fire safety strategy for the scheme and will be submitted for review by the building control body as part of the Building Regulations approvals process at the next stage.

Policy S1 Developing London's social infrastructure	Yes	The proposed development would enhance education provision within Hillingdon ensuring modern learning spaces are available to meet the needs of existing and future pupils.
Policy S3 Education and childcare facilities	Yes	The proposed development would reuse an existing SEND school site to deliver a new SEND school with increased capacity, pedestrian/cycle improvements, significant new landscaping, and a sustainable, high quality building.
Policy SI 1 Improving Air Quality	Yes	The application is supported by an Air Quality Assessment which concludes, which concludes that the change in AADT from the current school is such that a detailed air quality assessment is not required. In the context of the above, it is considered that the proposal is compliant with development plan policy relative to air quality.
Policy SI 13 Sustainable drainage	Yes	The application is supported by a Drainage Strategy and Flood Risk Assessment which concludes:  Excess surface water will be managed using a below ground attenuation tank.  The surface and foul water will discharge to separate Thames Water sewers.  Additional information is still required in order to fully develop the proposed drainage strategy, which may include filter strips and swales.
<b>LB Hillingdon Local Plan – Part 1</b>		
Policy BE1 Built Environment	Yes	The proposed development would deliver a new SEND school better able to cater to pupils' needs and accord with current DfE guidance on capacity.  The proposed development would also provide pedestrian/cycle improvements, significant new landscaping, and a sustainable, high quality building.
Policy CI1 Community Infrastructure Provision	Yes	The proposed development would reuse the site of an existing SEND school to deliver a sustainable, higher quality school and grounds with increased capacity and improved pedestrian/cycle links.
Policy EM5 Sport and Leisure	Yes	The proposed development includes a permeable asphalt MUGA for formal sports enclosed by a 3m high weldmesh fence.
Policy EM6 Flood Risk Management	Yes	The application is supported by a Drainage Strategy and Flood Risk Assessment which concludes:  The site is not at risk of flooding from fluvial or surface water sources.  The site is at moderate risk of groundwater flooding.  The site is not located within a critical drainage area and is located in Flood Zone 1.

Policy EM7 Biodiversity and Geological Conservation	Yes	<p>The application is supported by an Ecological Appraisal which concludes:</p> <p>The majority of the woodland habitat will be retained and is there may be an opportunity to enhance it where proposals align with the long-term management plan for Ruislip Woods.</p> <p>Recommendations have been made with respect to the appropriate precautions to be observed for any vegetation and site clearance and minimising pollution including artificial lighting. Potential enhancements are also proposed for consideration.</p> <p>Specific recommendation with respect to bats are included in a separate report.</p>
<b>LB Hillingdon Local Plan – Part 2 Policies</b>		
DMCI 1 Retention of Existing Community Sport and Educational Facilities	Yes	The proposed development would reuse the site of an existing SEND school to deliver a sustainable, higher quality school and grounds with increased capacity and improved pedestrian/cycle links.
DMCI 1A 'Development of New Education Floorspace'	Yes	The proposed development would enhance education provision within Hillingdon ensuring modern learning spaces are available to meet the needs of existing and future pupils.
DMCI 7 Planning Obligations and Community Infrastructure Levy	Yes	See 'Draft Heads of Terms'.
DMEI 1 Living Walls and Roofs and Onsite Vegetation	Yes	The proposed development includes significant landscaping and planting that retain the mature tree canopy surrounding the school site. Due to this tree canopy, new plants have been selected to tolerate partial-full shade. Plants have been selected in areas accessible to pupils to ensure they are not toxic or harmful. Across the site 21 new trees are proposed, and species adjacent to the woodland have been selected to replicate those already found in the woodland.

DMEI 10 Water Management, Efficiency and Quality	Yes	<p>The application is supported by a Drainage Strategy and Flood Risk Assessment which concludes:</p> <p>The proposed scheme will limit discharge to the 1 in 1-year greenfield return period by using a vortex flow control device, limiting the discharge rate from site to 2.9 l/s.</p> <p>Excess surface water will be managed using a below ground attenuation tank.</p> <p>The surface and foul water will discharge to separate surface and foul water Thames Water sewers.</p> <p>The site is seen to be a low risk of surface water pollution.</p> <p>Additional information is still required in order to fully develop the proposed drainage strategy.</p>
DMEI 14 Air Quality	Yes	<p>The application is supported by an Air Quality Assessment which concludes, which concludes that the change in AADT from the current school is such that a detailed air quality assessment is not required. In the context of the above, it is considered that the proposal is compliant with development plan policy relative to air quality.</p>
DMEI 2 Reducing Carbon Emissions	Yes	<p>The estimated EUI for the proposed development is 56.79 kWh/m<sup>2</sup> per annum. The passive design and energy efficiency measures proposed include:</p> <ul style="list-style-type: none"> <li>• Fabric insulation levels achieving improvements over the Building Regulations Part L (2021).</li> <li>• Suitable glazing ration and glass g-value to balance heat losses, heat gains and daylight ingress.</li> <li>• Fabric air permeability improvement upon Building Regulations Part L (2021)</li> <li>• Insulated pipework and ductwork to minimise heat losses and gains</li> </ul> <p>Variable speed pumps to minimise energy consumption for distribution of services.</p>
DMEI 6 Development of Green Edge Locations	Yes	<p>The proposed development uses extensive peripheral landscaping to assimilate into the adjacent SSSI, seeking to retain the majority of the woodland habitat. The building has been designed with recognition of the setting of the SSSI.</p>

DMEI 7 Biodiversity Protection and Enhancement	Yes	<p>The application is supported by an Ecological Appraisal which concludes:</p> <p>The majority of the woodland habitat will be retained and is there may be an opportunity to enhance it where proposals align with the long-term management plan for Ruislip Woods.</p> <p>Recommendations have been made with respect to the appropriate precautions to be observed for any vegetation and site clearance and minimising pollution including artificial lighting. Potential enhancements are also proposed for consideration.</p> <p>Specific recommendation with respect to bats are included in a separate report.</p>
DMHB 11 Design of New Development	Yes	<p>The building has been designed with recognition of the setting of the SSSI, and has drawn on the local architecture, character, and materials palate, which is reflected within the proposed facade treatment of the building.</p>
DMHB 12 Streets and Public Realm	Yes	<p>The proposed development will deliver improved legibility, public realm design, and landscaping, and safe pedestrian and cycle links through the site.</p>
DMHB 14 Trees and Landscaping	Yes	<p>The application is supported by a Tree Survey, Arboricultural Impact Assessment and Outline AMS, which concludes:</p> <p>Demolition of the existing school building and adjacent surfaces and the expanded building footprint will require the removal of 21 trees.</p> <p>There are 30 trees and 2 groups which need to be removed to facilitate expansion of the car park.</p> <p>Works to improve drop off facilities and access to the front of the new school building will require the removal of 9 trees and 3 groups.</p> <p>Regrading work is required to facilitate access to the north-west of the new school building and will necessitate the removal of 4 trees.</p> <p>The installation of the external sprinkler tank to the north of the car park with necessitate the removal of 6 trees.</p> <p>Canopy pruning works will be required to provide clear access for construction vehicles.</p> <p>The application is also supported by a Design and Access Statement, which sets out the following landscape strategy:</p> <p>Landscape design principles are driven by the primary objective of retaining and protecting the mature tree canopy that surrounds the school site and provides screening and enclosure to the school car park.</p>

DMHB 15 Planning for Safer Places	Yes	<p>The main school gate will be manually operable and remain open throughout the school day. At the main school building entrance there will be controlled access from the reception. The location of staff areas allow the building's approach area to be overlooked and passively supervised.</p> <p>Within the site boundary, there will be a secondary, building secure line, stretching across the front of the building and around the pupils play areas.</p> <p>The out of school hours community access to the main hall on ground floor constrained by an internal perimeter allowing out of hours use to these facilities only.</p>
DMT 1 Managing Transport Impacts	Yes	<p>The application is supported by a Transport Assessment which concludes:</p> <p>It is considered that the proposed development will not give rise to any unacceptable road safety issues within the area studied.</p> <p>There is limited space to implement any physical mitigation measures, however, the provision of a Travel Plan, which will encourage new and existing staff to travel by sustainable modes based on a reduced number of car parking spaces.</p> <p>Pedestrian and cycle permeability will be significantly enhanced through the provision of Travel Plan improvements relating to public transport accessibility.</p>
DMT 2 Highways	Yes	<p>It is considered that the proposed development will not give rise to any unacceptable road safety issues within the area studied.</p>
DMT 5 Pedestrians and Cyclists	Yes	<p>Pedestrian and cycle permeability will be significantly enhanced through the provision of Travel Plan improvements relating to public transport accessibility.</p>

6.26 Accordingly, it is considered that the proposal does conform with relevant planning policy.

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## 7. DRAFT HEADS OF TERMS

### Policy Context

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- 7.1 In respect of the negotiation of planning obligations associated with development proposals, Regulations 122 (2) of the Community Infrastructure Levy Regulations states that:

*'A planning obligation may only constitute a reason for granting planning for the development if the obligation is:*

*a) Necessary to make the development acceptable in planning terms;*

*b) Directly related to the development; and*

*c) Fairly and reasonably related in scale and kind to the development.'*

- 7.2 Paragraph 57 of the NPPF states that planning obligations should only be sought where they meet all the tests outlined in Regulation 122 of the Community Infrastructure Levy Regulations, as set out above. Regulation 123 provides further restrictions on the use of Planning Obligations.

- 7.3 LB Hillingdon produced a Planning Obligations SPD that explains how contributions sought under s.106 of the Town and Country Planning Act 1990 (as amended) function alongside the Community Infrastructure Levy.

- 7.4 Whilst CIL is unlikely to be required to mitigate the development, it is evident that both planning obligations and a suite of planning conditions will be required to both mitigate the impacts of the development, secure improvements to the area being proposed (some of which in mitigation and some of which to enhance the infrastructure of the area).

- 7.5 Following our pre-application discussions with the Council,, there are only two proposed Heads of Terms, these are as follows:

- Securing the Travel Plan; and
- Monitoring of the Travel Plan.

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## 8. CONCLUSION AND APPLICATION BENEFITS

- 8.1 The Proposed Development would give rise to a number of significant public benefits, which are material considerations that lend additional weight to the positive dispensation of the application set out in planning policy.
- 8.2 As set out in this planning statement, the Proposed Development will provide a wide range of benefits, with the principal benefits being:
- **A new school with increased capacity**— At full capacity, the new Pinn River School could cater for 180 students, which is an increase of 80 students on the existing school. This meets an identified need and attracts great weight in the decision making process;
  - **Social inclusion** – the proposals promote social inclusion through equality of access to educational facilities, with specific recognition to acknowledging residents living in areas of identified need;
  - **Provision of a high quality landscaped areas** including a Multi Use Games Area and multi-sensory play spaces to meet the needs of the students; and
  - **Biodiversity** – Overall, the site will deliver a 10% Biodiversity Net Gain on the baseline provision, once the development is completed.
- 8.3 The Applicant has worked hard to balance the needs of the students, DfE Guidance and the existing local context.
- 8.4 The Applicant has sought to follow best practice, with early engagement with LB Hillingdon planning officers, with feedback incorporated into the Proposed Development.
- 8.5 As is set out above, this Planning Statement demonstrates the Application accords with the aims and objectives of national, regional and local planning policy, and indeed the development plan (when read as a whole). This means that the presumption in favour of the development plan, which is provided for by Section 38(6) of the Planning and Compulsory Purchase Act (2004), amounts in this matter to a (strong) presumption in favour of approving the proposals. It follows that unless material considerations indicate otherwise, planning permission should be granted. Far from indicating otherwise to the grant of permission, the material considerations lend very substantial further weight to permission being granted and in accordance with NPPF paragraph 11 (c), this should be done without delay. Accordingly, we respectfully request that planning permission is granted.