

# ***PLANNING STATEMENT***

**In Respect Of:**

**FULL PLANNING APPLICATION**

**With Regard To:**

**The Lodge and The Annex  
Harmondsworth Lane  
Hayes  
London  
UB7 0LQ**

**On Behalf Of:**

**Landon Education Ltd**

CREATE: IG/P\_454  
Date: 30.07.2025

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## 1.0 EXECUTIVE SUMMARY



This Planning Statement (“Statement”) has been prepared by CREATE Planning, on behalf of Landon Education Limited (“Applicant”) at The Lodge and The Annex, Harmondsworth Lane, Hayes, UB7 0LQ (“Site”) to support the following:

- Full Planning Application
- Listed Building Consent (The Lodge, 1080218).

The premise of the applications is to convert the office space at both The Lodge and The Annex into new Special Education Needs and Disabilities (SEND) school which will expand the existing Landon School. The buildings will provide the capacity for 88 primary age school children aged 5 to 19 and 66 members of staff. The proposal will require internal alterations and associated external landscaping areas and will utilize some shared facilities of Landon School. The scheme also adds the opportunity to rationalise some approved but unbuilt elements at Landon School.

Planning permission is sought for:

*Change of use of the building from office (Use Class E) to non-residential education centre (SEND school) (Use Class F1) with minor external alterations including, gates, fences, and cycle stores, and associated landscaping works.*

The proposal is for new SEND primary and secondary school will have a capacity of 88 school children aged 5 to 19 and 66 staff. This capacity is possible via the change of use and minor alterations to the buildings known as “The Lodge”, which is a Grade II Listed Building and “The Annex” (which not a listed building, nor has any planning designations).

The application seeks to expand Landon School Harmondsworth by creating a campus area by building on an existing planning consent at *Aviation House, Harmondsworth Lane, Hayes, London UB7 0LQ* under the application reference 2157/APP/2023/3068 which was granted planning approval on 18<sup>th</sup> April 2024. The planning consent for the school at Aviation House accommodates 40 students with 30 staff.

On the basis that this application is granted planning consent the campus will in total provide a school capacity of 112 students and 96 members of staff across the campus.

Due to the nature of The Lodge being a Grade II Listed Building the Listed Building entry number of 1080217 this application is submitted in parallel with an application for Listed Building Consent. The applications also come with the awareness that the Wall to the east of the Lodge is also Grade II Listed under the entry number of 1080218. However, no works or alterations to the listed wall are proposed.

## 2.0 INTRODUCTION

This Planning Statement (“Statement”) has been prepared by CREATE Planning (“Agent”), submitted on behalf of Landon Education Limited (“Applicant”), in support of a Full Planning Application (“Application”), with regard to a change of the use of the buildings at *The Lodge and The Annex, Harmondsworth Lane, Hayes, London UB7 0LQ* (“Site”).

CREATE provides architectural, town planning and urban design consultancy advice to corporate and commercial clients as well as to house builders, and private individuals on a wide range of development throughout the United Kingdom. CREATE is a leader in the built environment; an innovative multidisciplinary practice creating outstanding people centric and exemplary schemes.

This statement sets out the development proposal in Section 3, identifies the site and surrounding area at Section 4, and outlines the relevant planning history in Section 5. Section 6 reflects in summary the pre-application advice which has been undertaken in advance of the application and the relevant planning policy is set out in Section 7. The statement assesses the proposed development in accordance with those policies at Section 8. Our conclusions are set out in Section 9.

The assessment also takes into consideration the National Planning Policy Framework (NPPF, December 2024) and the Government web-based Planning Practice Guidance. This statement should be read in conjunction with the accompanying drawings and supporting documents which have been submitted as part of this application which are listed as follows.

### Supporting Documents

In order to comply with the validation requirements set by the London Borough of Hillingdon (“Council”), this application is supported by the following additional documents:

- Covering Letter by *CREATE Planning*;
- Signed and completed application form completed by *CREATE Planning*;
- Community Infrastructure Levy (CIL) Forms *CREATE Planning*;
- Complete Full pack of submission drawings prepared by *CREATE Design+Architecture*. For specific drawings refer to Covering Letter;
- Design & Access Statement prepared by *CREATE Design+Architecture*;
- Landscape Design by *CREATE Design+Architecture*;
- Marketing information (Office Submarket Report), prepared by *Bray Fox Smith*;
- Marketing information (The Lodge Marketing Evidence), prepared by *Cushman Wakefield*;
- Marketing information (Marketing Brochure), prepared by *Cushman Wakefield*;
- Heritage Statement prepared by *Cogent-Heritage*;
- Transport Statement prepared by *Kronen Limited*;
- Noise Impact Assessment prepared by *Syntegra Group*;
- BREEAM Pre-Assessment prepared by *Syntegra Group*;
- Energy Strategy prepared by *Syntegra Group*;
- Air Quality Assessment prepared by *Syntegra Group*;
- Arboriculture Impact Assessment prepared by *TMA Environmental Consultants*.

### 3.0 PROPOSED DEVELOPMENT

The proposal is for the change of use of the building from office (Use Class E) to non-residential education centre (SEND school) (Use Class F1) with minor external alterations including, gates, fences, and cycle stores, and associated landscaping works. The proposed development description is as follows:

#### Proposed Development Description

*Change of use of the building from office (Use Class E) to non-residential education centre (SEND school) (Use Class F1) with minor external alterations including, gates, fences, and cycle stores, and associated landscaping works.*

The proposal for the new SEND primary and secondary school is to expand the recently approved school at Aviation House to create a school campus. The approved scheme under the application reference of 2157/APP/2023/3068 was for the creation of a SEND school at Aviation House which sits to the rear of the site. Planning permission was granted on 18<sup>th</sup> April 2024 for a school operational capacity based on providing for 40 students with 30 members of staff. Since the application was granted planning approval at Aviation House it is understood that the school has become operational and is called Landon School Harmondsworth.

The proposed expansion of Landon School at The Lodge and The Annex seeks to efficiently utilise the site sustainably with many benefits. This includes creating some shared facilities. An example of this is The Lodge and The Annex will share the catering and food hall at Aviation House timetabling staggered lunch breaks. In doing so, it is also proposed that outdoor play areas at Aviation House can also be shared. In return, the proposed development at The Annex, includes a Multi-use Hall (108.8m<sup>2</sup>) which can be used by both the student classes at Aviation House and The Lodge. Furthermore, the proposal contains a Medical Room (10.2m<sup>2</sup>) at The annex and a substantial area (244m<sup>2</sup>) for members of Staff on the Lower Ground Floor of The Lodge.

The proposal also seeks to create a Campus environment which brings the surrounding site into one demise. This is of great value for the future of the school to accommodate future needs, creating a safe and controlled environment for the children, and for the car parking to be solely belonging to the school. The car park area in its entirety belonging to the school will be of great value from the perspective of management for encouraging staff to travel by sustainable modes of transport, managing waste collection, and for the management at rush hour times of arrival for school drop-offs and pick-ups of the children.

A summary of both the existing and proposed number of pupils and staff is in the table below.



*Table 1: Existing and Proposed No. of Pupils and Staff*

Development Proposal	No. of Pupils	No. of Staff
<b>Aviation House, Harmondsworth (Existing):</b> Approved under App. Ref. 2157/APP/2023/3068	40	30
<b>The Lodge, Harmondsworth (Proposed)</b>	24	18
<b>The Annex, Harmondsworth (Proposed)</b>	64	48
<b>Total</b>	128	96

The proposal to expand the Landon School is to expand the educational offering of the school. The campus and expanded school will allow for an offering to accept more primary school students as well as secondary school offering for children up to the age of 19. This has significant benefits which are listed below:

#### **Benefits of Landon School Secondary Education Offering**

- Pupils (particularly those with special needs that create difficulties when there is changes to their environment) will maintain environment familiarity throughout the entirety of their education;
- Pupil's will have a seamless transition through educational year groups;
- Capacity for increased number of pupils per year group allows for school operational efficiency gains (e.g.: admin roles, etc.);
- Pupil and staff familiarity throughout education fostering stronger pupil and staff relationships;
- Seamless transition for administering and actioning pupil's special educational plans;
- Ability to maintain extra-curricular and pastoral assistance for the bespoke needs of pupil's the child's growth through adolescence and early adulthood;
- Ensuring that pupils have the best possible to start to life post education.

The proposal seeks to make several changes across the site to implement the change of use to be used for educational purposes. This includes some minor alterations, to the site, The Lodge and The Annex. The changes to these are set out in the following sections.

#### **The Site**

The proposal seeks to make some changes to the site. These include a perimeter fence to separate the car park and the proposed school which runs north-south on the east side of the Lodge and The Annex. To create a campus of the existing Landon School (formerly Aviation House).

#### **Proposed Changes to Listed Building**

The building known as 'The Lodge' is a Grade II Listed Building under the Listed Building entry number of 1080217. As part of this application alterations to the Listed Building have been proposed. As a result, a parallel application for Listed Building Consent (LBC) has been submitted to the Council. A detailed Heritage Statement prepared by Cogent Heritage has been submitted as part of this planning application. The Heritage Statement assesses the heritage assets and the "setting" of the heritage assets including the impact of the proposed changes. The summary of the proposed changes to the heritage assets are set out in the table below.



*Table 2: Alterations to the Heritage Assets*

Building	List of Proposed Changes or Alterations
<b>The Lodge</b> <i>Grade II Listed Building</i> <i>Listed Building Entry No.: 1080217</i>	<p>Lower Ground Floor</p> <ul style="list-style-type: none"> <li>Reinstate the original plan form of the former Northeast Room by removing the subdivision walls which are later additions.</li> </ul> <p>Ground Floor</p> <ul style="list-style-type: none"> <li>Reinstate the original plan form of the former Southeast Room by removing the subdivision walls which are considered to be later additions, installed at the time that the extension was built.</li> </ul> <p>First Floor</p> <ul style="list-style-type: none"> <li>Reinstate the original plan form of the former Northeast Room by removing the subdivision walls which are later additions.</li> <li>Insertion of wall in the proposed store cupboard that encircles the existing window which overlooks the proposed Large Class Room.</li> <li>Insertion of walls and plumbing fixtures in the central south area of the building to create WC/s, janitor's store cupboard, and for a Specialist Classroom. This arrangement also provides corridor to the external staircase fire escape.</li> </ul>
<b>The Annex</b>	<p>Ground Floor</p> <ul style="list-style-type: none"> <li>Not Applicable: Internal Alterations are proposed however the Annex is not a Listed Building.</li> </ul> <p>First Floor</p> <ul style="list-style-type: none"> <li>Not Applicable: Internal Alterations are proposed however the Annex is not a Listed Building.</li> </ul>
<b>Landon School</b> (Previously known as Aviation House)	<p>Ground Floor</p> <ul style="list-style-type: none"> <li>Not Applicable: Internal Alterations are proposed however the Annex is not a Listed Building.</li> </ul> <p>First Floor</p> <ul style="list-style-type: none"> <li>Not Applicable: Internal Alterations are proposed however the Annex is not a Listed Building.</li> </ul>
<b>Wall to the East of The Lodge</b> <i>Grade II Listed Building</i> <i>Listed Building Entry No.: 1080218</i>	<ul style="list-style-type: none"> <li>Not Applicable: No changes are proposed, however it is acknowledged that a new fence is proposed to be in close proximity to, and within the "setting" of the wall.</li> </ul>

*NOTE: Please refer the Existing and Proposed Drawings and the Heritage.*

## School Areas

The table summarises the development proposal per building with the associated areas (m<sup>2</sup>):

Table 3: Proposed Development		
Proposed Areas	Number of Classrooms / Offices (exc. Circulation)	Total Area GIA
<b>The Lodge</b> Lower Ground Floor	<ul style="list-style-type: none"> <li>Staff Room 1 (Area 52 m<sup>2</sup>)</li> <li>Staff Room 2 (Area 26.6 m<sup>2</sup>)</li> <li>Staff Room 3 (Area 17.9 m<sup>2</sup>)</li> <li>Staff Kitchen (Area 9.1 m<sup>2</sup>)</li> <li>Store 1 (Area 16.7 m<sup>2</sup>)</li> <li>Store 2 (Area 18 m<sup>2</sup>)</li> <li>Staff WC 1 (Area 2.5 m<sup>2</sup>)</li> <li>Staff WC 2 (Area 2.6 m<sup>2</sup>)</li> <li>Caretaker Office (Area 19.4 m<sup>2</sup>)</li> <li>Plant (Area 11.5 m<sup>2</sup>)</li> </ul>	244 m <sup>2</sup>
<b>The Lodge</b> Ground Floor	<ul style="list-style-type: none"> <li>Classroom 1 (Area 44.2 m<sup>2</sup>)</li> <li>Classroom 2 (Area 44.9 m<sup>2</sup>)</li> <li>Office / Reception (Area 37.9 m<sup>2</sup>)</li> <li>Office (Area 11.9 m<sup>2</sup>)</li> <li>Student Kitchen (Area 10.4 m<sup>2</sup>)</li> <li>Staff / Visitor WC (Area 6.9 m<sup>2</sup>)</li> <li>WC 1 (Area 6.7 m<sup>2</sup>)</li> </ul>	243.5 m <sup>2</sup>
<b>The Lodge</b> First Floor	<ul style="list-style-type: none"> <li>Classroom 3 (Area 44.1 m<sup>2</sup>)</li> <li>Large Classroom (Area 57 m<sup>2</sup>)</li> <li>Specialist Classroom 1 (Area 18.1 m<sup>2</sup>)</li> <li>Specialist Classroom 2 (Area 17 m<sup>2</sup>)</li> <li>Store 3 (Area 4.1 m<sup>2</sup>)</li> <li>Store 4 (Area 5.6 m<sup>2</sup>)</li> <li>Office / Meeting Room (Area 20.5 m<sup>2</sup>)</li> <li>WC 2 (Area 2.3 m<sup>2</sup>)</li> <li>WC 3 (Area 2.3 m<sup>2</sup>)</li> </ul>	225 m <sup>2</sup>
<b>The Annex</b> Ground Floor	<ul style="list-style-type: none"> <li>Entrance Lobby (Area 21.3 m<sup>2</sup>)</li> <li>Store 1 (Area 4.1 m<sup>2</sup>)</li> <li>Store 2 (Area 7.6 m<sup>2</sup>)</li> <li>Store 3 (Area 2.5 m<sup>2</sup>)</li> <li>Accessible WC (Area 2.7 m<sup>2</sup>)</li> <li>Accessible Shower (Area 7.3 m<sup>2</sup>)</li> <li>WC 1 (Area 7.8 m<sup>2</sup>)</li> <li>WC 2 (Area 7.8 m<sup>2</sup>)</li> <li>WC/ Shower (Area 10.6 m<sup>2</sup>)</li> <li>Male Changing (Area 8.8 m<sup>2</sup>)</li> <li>Medical Room (Area 10.2 m<sup>2</sup>)</li> <li>Multi-use Hall (Area 108.8 m<sup>2</sup>)</li> <li>Classroom 1 (Area 50.4 m<sup>2</sup>)</li> <li>Classroom 2 (Area 50.6 m<sup>2</sup>)</li> <li>Classroom 3 (Area 51.5 m<sup>2</sup>)</li> <li>Office / Meeting Room 1 (Area 9.7 m<sup>2</sup>)</li> <li>Kitchen (Area 8.9 m<sup>2</sup>)</li> <li>Plant (Area 7.8 m<sup>2</sup>)</li> </ul>	510.8 m <sup>2</sup>

<b>The Annex</b> First Floor	<ul style="list-style-type: none"> <li>Classroom 4 (Area 55 m<sup>2</sup>)</li> <li>Classroom 5 (Area 51.6 m<sup>2</sup>)</li> <li>Classroom 6 (Area 56.4 m<sup>2</sup>)</li> <li>Classroom 7 (Area 54.9 m<sup>2</sup>)</li> <li>Classroom 8 (Area 53.1 m<sup>2</sup>)</li> <li>Sensory Room (Area 16.5 m<sup>2</sup>)</li> <li>Store 4 (Area 6.3 m<sup>2</sup>)</li> <li>Office / Meeting Room 2 (Area 10.1 m<sup>2</sup>)</li> <li>WC Male (Area 10.6 m<sup>2</sup>)</li> <li>WC Female (Area 10.6 m<sup>2</sup>)</li> <li>Female Changing (Area 7.6 m<sup>2</sup>)</li> <li>Cleaners Cupboard (Area 3.2 m<sup>2</sup>)</li> <li>Quiet Room (Area 17.2 m<sup>2</sup>)</li> <li>IT / Coms Room (Area 4.8 m<sup>2</sup>)</li> </ul>	516 m <sup>2</sup>
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*NOTE: For Detailed Existing and Proposed Areas refer to Accommodation Schedule.*

## Parking

The proposal has considered the parking requirements for the development which are summarised in the table below.

<i>Table 4: Proposed Parking</i>	
Type of Parking	Number of Classrooms / Offices (exc. Circulation)
<b>Car Parking</b>	<ul style="list-style-type: none"> <li>61 Car parking spaces</li> <li>3 Accessible car parking spaces (Blue Badge Holders)</li> <li>4 Electric Vehicle (EV) car parking spaces</li> </ul>
<b>Mini Bus Bay</b>	<ul style="list-style-type: none"> <li>Classroom 1 (Area 44.2 m<sup>2</sup>)</li> </ul>
<b>Bicycle Parking</b>	<ul style="list-style-type: none"> <li>30 Long stay bicycle parking spaces</li> <li>6 Short stay bicycle parking spaces</li> </ul>

*NOTE: For further information refer to plan drawings and Transport Statement.*

## Waste and Recycling

The proposal includes an existing waste storage area within the site boundary which is considered to be sufficient for the use of the entire site. The school staff will use this area to transfer the waste to for refuse collection. The existing waste store is near the vehicle access, and which is suitable for collection as per the existing arrangement and use of the site. Refer to plans accordingly.

## 4.0 DESCRIPTION OF THE SITE

### Existing Use

The existing use of both the Lodge and The Annex are as offices (Use Class F1) and Landon School which is a SEND School under *Use Class F1*.

### Site Context

The Site sits to the south of both Harmondsworth Lane and Holloway Lane. The vehicle access comes from Harmondsworth Lane. Pedestrian and cycling access is taken from Holloway Lane.



Above: Satellite Image of the Site

Source: Google Earth

The Site area is 1,581 sqm (0.158 ha) circa. The Site is 62.7m wide at its widest by 25.5m deep at its longest point.

The Site sits on the edge of Harmondsworth Village, Hayes. Immediately south and east of the Site is Green Belt, with Heathrow Airport located one mile south of the site. Immediately north of the Site are a small collection of houses while further north is open space and the M4 motorway. Immediately west of the Site is Home Farm with the setting of the village further west.

The site contains three buildings, Landon School, The Lodge, and The Annex of which the latter are commercial offices (Use Class E). The primary buildings that are the premise of both the application for Full Planning Permission and Listed Building Consent (LBC) are The Lodge and The Annex. These buildings are located towards the front of the site on the western boundary.

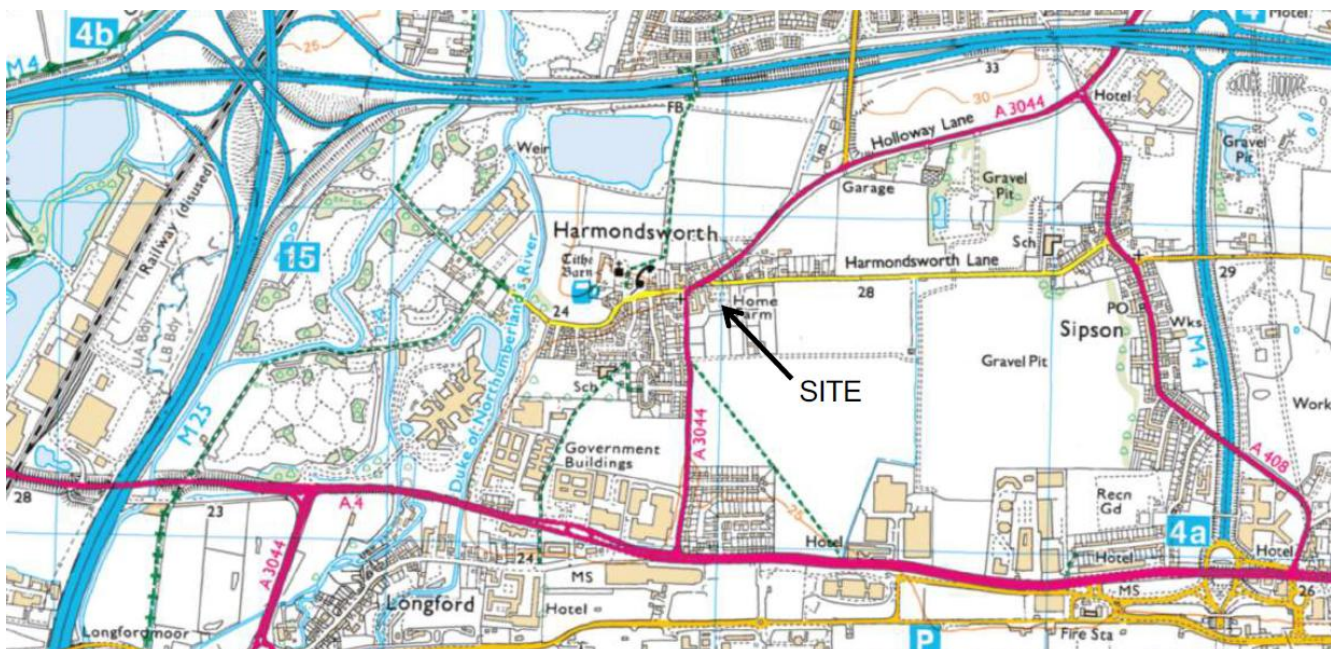
The Lodge and The Annex consist of open plan offices which are partially vacant. The offices that are occupied by businesses typically let individual rooms of the buildings. It is understood that the tenancy and letting arrangements are coming to an end and there are little interest from the existing occupiers to extend their letting terms. Furthermore, a significant proportion of the buildings are currently vacant and have not been occupied for a extended period with little interest in lettings.



The Site can be described as an enclosed and secluded site with a private setting. For the reasons that, both the vehicle and pedestrian access points are gated with a wall. The section of Wall to the East of The Lodge is a Grade II Listed building of historical importance by English Heritage. The east, south and west boundaries have a soft boundary treatment consisting of planted hedgerows with several established trees that provides a deciduous visual screen. In the central spaces of both the car park and near the courtyard there are some trees which provides shading and are attractive features.

The Site has ample capacity for car parking with 63 existing car parking spaces. This, includes 6 Electric Vehicle Charge points located to the north of the site, and an Accessible Car Parking space (blue badge holders), as well as a minibus drop off area located in front of Landon School. There are 2 existing car parking spaces near Landon School for which it is understood are scheduled to have a both a passive and active EV charging point installed as per the recently approved planning permission (App. Ref: 2157/APP/2023/3068). The site has limited cycle parking with only 4 spaces for both long and short stay visitors.

## Surrounding Context



**Above:** Ordnance Survey Map showing the broader surrounding area and the road network **Source:** Ordnance Survey Map.

The Site is in a very accessible location. The Site is located adjacent to the A3044 which provides a route to the M4, linking the Site with west and central London. The A4 is easily accessed from the Site via Hatch Lane. The A4 provides a quick route to Heathrow Airport.

## Landon School

Landon School, formerly known as Aviation House is located at the rear (south) of the site and sits on an east-west axis. Planning permission was granted on 18<sup>th</sup> April 2024 under the

application reference 2157/APP/2023/3068. The school capacity of approved consent was based on 40 students with 30 staff. The application submitted was specifically for the following:

*Change of use of the building from office (Use Class E) to non-residential education centre (SEND school) (Use Class F1) with minor external alterations including, gates, fences, and cycle stores, and associated landscaping works.*

Landon School has since been opened and has become operational. The table below summarises the facilities (m<sup>2</sup>):

Table 5: Landon School Facilities		
Floor Area	Number of Classrooms / Offices (exc. Circulation)	Total Area GIA
Outside Area	<ul style="list-style-type: none"> <li>Children's Play Area</li> <li>Disabled Car Parking Space (Blue Badge Holders)</li> <li>Electric Vehicle Charging Point (Active) – <i>Scheduled To be Constructed</i></li> <li>Electric Vehicle Charging Point (Passive) – <i>Scheduled To be Constructed</i></li> <li>Minibus Drop Off Point</li> <li>4x Bicycle (Short &amp; Long Stay Storage)</li> </ul>	N/A
Ground Floor	<ul style="list-style-type: none"> <li>Classroom 1 (Area 53.3 m<sup>2</sup>)</li> <li>Classroom 2 (Area 50 m<sup>2</sup>)</li> <li>Reception / Offices (Area 27.2 m<sup>2</sup>)</li> <li>WC's (Area 7.9 m<sup>2</sup>)</li> <li>Acc. Shower (Area 8.2 m<sup>2</sup>)</li> <li>Staff Kitchen (Area 11.2 m<sup>2</sup>)</li> <li>Multi-use Hall (Area 67.7 m<sup>2</sup>)</li> </ul>	312.2 m <sup>2</sup>
First Floor	<ul style="list-style-type: none"> <li>Classroom 3 (Area 61.1 m<sup>2</sup>)</li> <li>Classroom 4 (Area 48.4 m<sup>2</sup>)</li> <li>Classroom 5 (Area 60.8 m<sup>2</sup>)</li> <li>Staff Room (Area 24.4 m<sup>2</sup>)</li> <li>WC 1 (Area 13.9 m<sup>2</sup>)</li> <li>WC 2 (Area 10.6 m<sup>2</sup>)</li> <li>Sensory Room (Area 14.8 m<sup>2</sup>)</li> <li>Break Out Room (Area 14.8 m<sup>2</sup>)</li> <li>Art Room (Area 16 m<sup>2</sup>)</li> <li>Store Room (Area 7.4 m<sup>2</sup>)</li> </ul>	312.2 m <sup>2</sup>

It is understood that there are some unbuilt elements of the planning permission which have not been implemented under application 2157/APP/2023/3068. These elements are listed as follows:

- Proposed extended path from the Pedestrian entrance to Landon School via the western and southern side of The Annex;  
*Reason: The construction of the path is costly and the viability of doing so will impact the running of the school.*
- Proposed permeable hard standing to the rear of Landon School;  
*Reason: The construction of the path is costly and the viability of doing so will impact the running of the school.*

- Proposed secure refuse store;  
*Reason: The refuse store near the vehicle access is understood to have capacity and complies with Secure by Design.*
- Proposed bicycle store for 16 bicycles;  
*Reason: An understanding that it an over capacity of the existing four (short and long stay) bicycle storage at the site.*

There are several areas which are scheduled to be constructed in the near future as per the planning approval. These are listed as follows.

- Proposed children's play area to the east of Landon School;  
*Reason: The school has a limited number of pupils and therefore it is not required at this stage of time. Scheduled to be constructed when the pupil's capacity increase to cater for the need / demand.*
- Proposed additional car parking space in front of Landon School;  
*Reason: The school currently has ample car parking space as the children's play area to the east of the school has not been built which offer's a large area for car parking.*
- Some proposed landscaping features;  
*Reason: The school is in its infancy. The proposed landscaping is costly and therefore is a gradual process to complete.*
- Proposed timber Pergola and timber decking on the east and west of Landon School;  
*Reason: The school is in its infancy. The proposed pergola's are costly and are not an essential requirement for the running of the school. It is hoped that they will be constructed when the necessary funds become available.*

In expanding the scheme with some variations, the unbuilt elements become either surplus to requirements, have been repositioned elsewhere on the site, or are scheduled or postponed until the school is established and the necessary finances become available to implement.

## The Lodge

The Lodge being a Grade II Listed Building the Listed Building entry number of 1080217. As a result, this application has been submitted in parallel with an application for Listed Building Consent (LBC). In addition to the information set out below refer to the Heritage Statement.



**Above:** Photograph of The Lodge.

**Source:** Historic England website.



The details, listing entry, and information from Historic England's website has been set out as follows.

<b>Historic England Official List Entry</b>	Grade II Listed Building
<b>List Entry Number</b>	1080217
<b>Date first listed</b>	1 March 1950
<b>List Entry Name</b>	The Lodge
<b>National Grid Reference</b>	TQ 05946 77779
<b>Legacy System Number:</b>	202789

### Details

*1. 5018 HARMONDSWORTH LANE (South Side ) The Lodge TQ 0577 NE 34/166 1.3.50. II  
2. Early-mid C19 yellow brick house of 2 storeys, 3 windows, large proportions. Hipped slate roof with eaves soffit. Gauged flat brick arches to windows now boarded up. Central wide segment-arched recess wood-panelled with side pilasters. 3 stone steps, with wrought iron railings and gates, rise to this recess which hold door with traceried fanlight. On each return walls are bowed out slightly, and roofs expanded above the bows, to accommodate shaped rooms inside.*

The Lodge was built as a Georgian House, in the early to mid-19th Century. It is located to the northwest corner of the site, and is a three-storey building. The building has an east-west arrangement with a covered walkway to the south of the building which provides a linked connection to The Annex.

The existing use of the building is as open plan offices, in which businesses individually let rooms and have some common facilities such as a kitchen and WC's. The building is only partially occupied with many of the rooms being vacant.

The building is believed to have undergone various changes and alterations since it was originally built. This includes the subdivision of some rooms, the introduction of plumbing and sanitary facilities arising from a period when the building was converted from a residential house to an office building. Most notable a side extension was added to the southeast of the building in the 19<sup>th</sup> century.

The historic 'setting' of the building has significantly changed since the building was first constructed. There has been the installation of a substation to the west of the building with a gravel path. A large car park has been constructed on the east side of the building changing this area from a more rural setting to one of more urban character. On the south of the property the building known as "The Annex" has been built and connected to The Lodge with a 1<sup>st</sup> floor hallway and ground floor walkway. The Annex is disproportionately larger than The Lodge and is cited in a location which is believed to have once been garden's and with some woodland. The building previously known as "Aviation House" now the building of Landon School is also

located south of the property in the once landscaped area (refer to Historic Ordnance Survey Map from 1963 within the Heritage Statement).

The Lodge has multiple entrance points. The historical entrance of The Lodge is to the North which fronts Holloway Lane. The existing primary access for the office building is taken from the east for the reason that the entrance in this location provides convenient access from the car park. A third entrance lies on the west for those travelling by foot or by bicycle.

For further information regarding the history of the building, the site generally, the significance of the Listed building, and the heritage value refer to the Heritage Statement.

### Wall to the east of the Lodge

The Wall to the east of the Lodge is also Grade II Listed under the entry number of 1080218. However, no works or alterations to the listed wall are proposed.



**Above:** Photograph of Wall To East Of The Lodge.

**Source:** Historic England website.

The details, listing entry, and information from Historic England's website has been set out as follows.

<b>Historic England Official List Entry</b>	Grade II Listed Building
<b>List Entry Number</b>	1080218
<b>Date first listed</b>	6 September 1974
<b>List Entry Name</b>	Wall To East Of The Lodge
<b>National Grid Reference</b>	TQ 05960 77787
<b>Legacy System Number:</b>	202790

## Details

*1. \* 5a8 HARMONDSWORTH LANE (South Side) Wall to East of the Lodge TQ 0577 NE 34/167 TQ 07 NE 47/167 II 2. C18 red brick wall sloped up to early C19 upper part in stock brick. Returned southwards along eastern edge of orchard.*

Listing NGR: TQ0596077787

The Wall east of The Lodge is understood to have been constructed at a similar time to The Lodge. The wall's listing gives specific heritage value to the wall. The relationship between the Wall and The Lodge to a degree have an interchangeable contribution to the 'setting' of The Lodge and similarly The Lodge as part of the 'setting' of the Wall east of the Lodge. It is our view that the prominence of the wall holds most significance to Harmondsworth Lane and Holloway Lane. The inner side of the wall is believed to be less significant and the heritage value greatly diminished. This may not have always been the case however the nature of existing car park and the existing secured location for waste and recycling have diminished the heritage value on the inner side.

For further information regarding the history of the building, the site generally, the significance of the Listed building, and the heritage value refer to the Heritage Statement.

## The Annex

The building known as The Annex is located to the South of The Lodge and located on the Western edge of the site. The building is neither statutory or a locally not a listed building. The building is linked to The Lodge on the South side of the Lodge.



**Above:** Photograph of The Annex.

**Source:** Historic England website.

The Annex is a significantly larger building than The Lodge which has a courtyard arrangement. The primary entrance is located.



The Annex is a significantly larger building than The Lodge which has a courtyard arrangement. The building has multiple entrance points. However, the primary entrance is located in the centre of the building via the courtyard. The building has two wings to the building on the north and south which span eastwards with emergency exits at the end of each tip. A further entrance can be found to the north via the link from The Lodge.

The building is a modern with some traditional architectural characteristics. It is a brick building with a red tile roof. The building has some distinctive large dormers on the first floor which protrude from the external face of the building.

The building is understood to be vacant with no current tenants or lettings. Furthermore, there does not appear to be any interested parties. The offices are open plan with several rooms of varying sizes. There is a common shared kitchen and WC's which are located in the centre of the building. The interior of the building has had minor works taken place to maintain the building. However, the building generally needs refurbishment to modernise the building as many areas appear as looking tired.

## Home Farm

The Home Farm Buildings are Locally Listed buildings under the serial entry number of 059. Home Farm sits adjacent to the site outside of the red line boundaries.



**Left:** Photograph of Home Farm from Holloway Road.



**Right:** Photograph of Home Farm from Hatch Lane.

**Source:** London Borough of Hillingdon Council's website.

The details, listing entry, and information from the London Borough of Hillingdon's website has been set out as follows.

<b>List Entry</b>	Locally Listed Building
<b>Serial Number</b>	059
<b>Building Use</b>	Storage/farming
<b>List Entry Name</b>	Home Farm buildings

**National Grid Reference** TQ 05960 77787

**Legacy System Number:** 202790

## Details

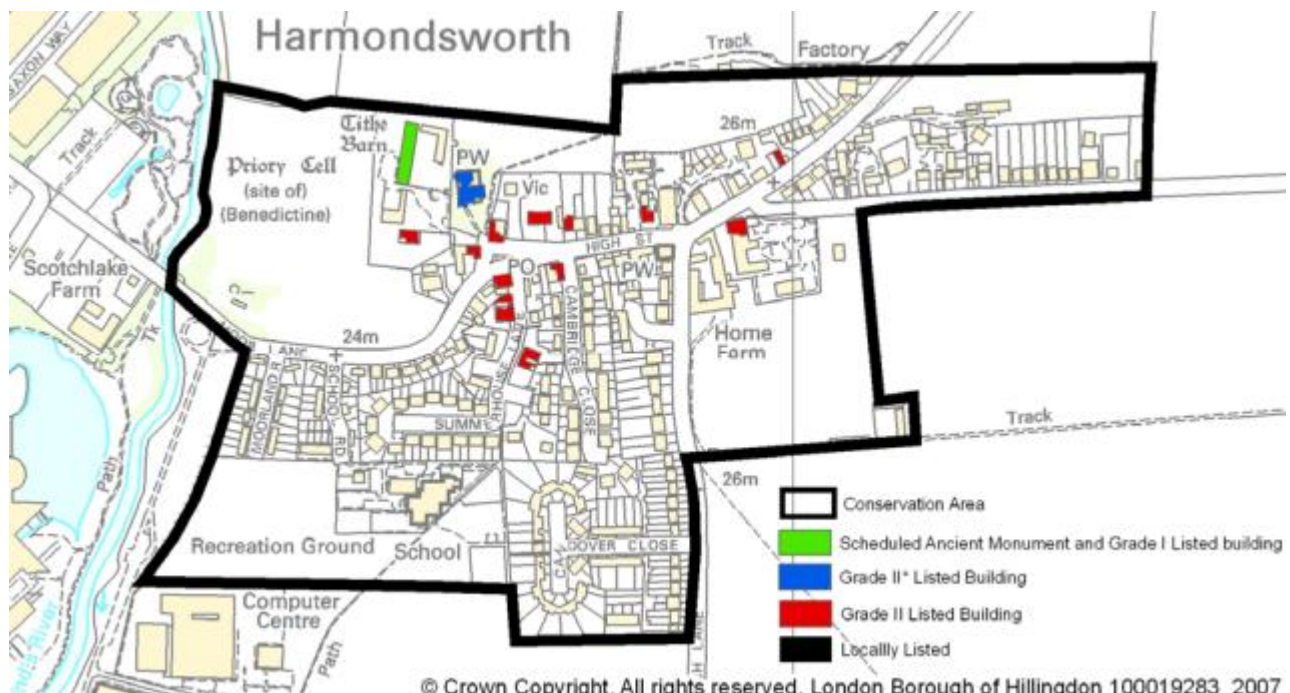
*Architectural: Large Victorian or earlier barns and adjoining range of buildings. Yellow stock brick and tiled roofs, simply detailed but attractive, sited at a major junction at the entrance to the village.*

*Townscape: Contributes to local character and street scene; key landmark.*

For further information regarding the history of the building, the site generally, the significance of the Listed building, and the heritage value refer to the Heritage Statement.

## Conservation Area

The site is situated within the Harmondsworth Village Conservation Area. A map of the conservation area is shown below alongside the locations of other heritage assets.



**Above:** Map of Harmondsworth Village Conservation Area.

**Source:** Harmondsworth Village Conservation Area Appraisal.

The Harmondsworth Village Conservation Area Appraisal sets out the history and relevant detail for assessing the conservation area and the potential impact arising from development. The Council should refer to this key document when assessing applications within the Conservation Area. The key area's for reference within this document are listed a follows:

- *General Character and Plan Form, Paragraph 2.2*

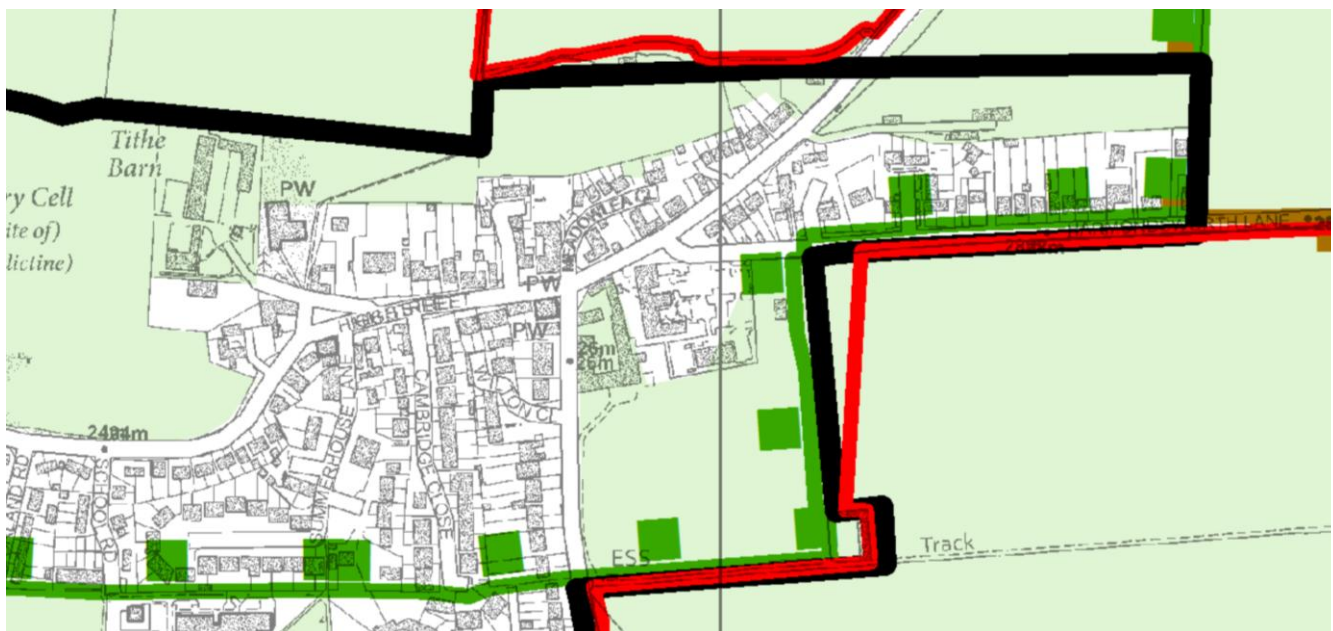
- History of the Village Centre, Paragraph 2.3
- History of the Street Layout, Paragraph 3.5
- *Key Views and Vistas*, Paragraph 4.0
- *Core Areas*, Paragraph 5.0
- Characteristics and Attractive Attributes, Paragraph 5.1-5.4
- *Scale*, Paragraph 5.9

For further information regarding the history of the Conservation Area, the site generally, the significance of The Site in relation to the Conservation Area, and the heritage value refer to the Heritage Statement.

## Planning Designations Summary

According to Hillingdon's Local Plan Part 1 and policies in the Local Plan Part 2, the Environment Agency and Historic England the following designations apply on-site:

- The Lodge is Grade II Listed, since 1950 and there a number of other Listed Buildings in the wider Harmondsworth Village;
- Within Flood Zone 1;
- Within PTAL Area Rating of 1b
- Within the Harmondsworth Village Conservation Area;
- Archaeological Priority Area;
- Area of Environmental Opportunity;
- Heathrow Opportunity Area; and
- London's Greenbelt



**Above:** London Borough of Hillingdon Revised Policy Map.

**Source:** Harmondsworth Village Conservation Area Appraisal.

## Special Educational Needs and Disabilities

More than 3,500 children and young people in Hillingdon have an Education, Health and Care Plan (EHCP), and that number is expected to grow by 16% over the next 7 years. This strategy helps us plan ahead - so we can meet growing demand, support inclusion, and make sure every child has the chance to succeed.

The London Borough of Hillingdon has an ambitious strategy for the provision of SEND School's from 2023 to 2028. As part of this the strategy the Council numerically list their key priorities which have been replicated below.

**1. Inclusive education for all.**

We will support all early years settings, schools, and colleges to be inclusive and meet a wide range of needs.

**2. Specialist provision that meets local needs.**

We will expand and improve local specialist school places and support services so that more children can be educated in their local community.

**3. A flexible and responsive alternative provision offer.**

We will develop a tiered model of alternative provision that supports reintegration into mainstream education and prepares young people for adulthood.

To meet the above ambitions the Council are steadfast in continuing to:

- Creating over 700 new SEND school places across Hillingdon.
- Opening new Specialist Resource Provisions (SRPs) and Designated Units (DUs) and expanding existing ones.
- Enhancing early identification and intervention through tools such as the Early Identification Toolkit and Early Support Funding.
- Strengthening post-16 and post-19 education options for young people with complex needs through the development of local provision.
- Developing a Dynamic Purchasing System to improve the quality and value of commissioned alternative provision.

For further information the Council should refer to the following published information and resources:

- *Hillingdon Local Area SEND and Alternative Provision Strategy for Children and Young People 0-25 years (2023-2028)*
- *Local Area Joint SEND Needs Assessment (JSNA) 2022*
- *Local area SEND Inspection November 2016*
- *Co-production meetings, workshops and consultation*

This SEND and AP strategy is aligned with various strategies/plans across the local area including the:

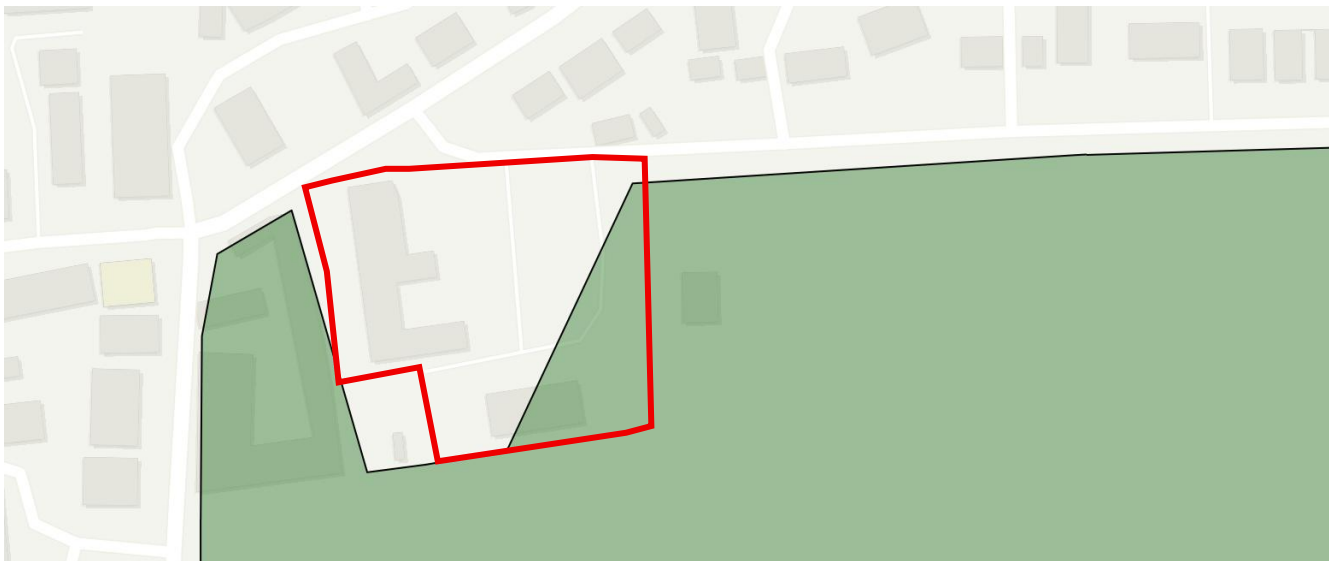
- *Hillingdon Council Strategy 2022-2026*
- *CNWL Strategy for 2022-2025*
- *Hillingdon Council Draft School Improvement Strategy*
- *Hillingdon Council Joint Health and Wellbeing Strategy 2022-2025*
- *Hillingdon Joint Autism Needs Assessment 2022*
- *Hillingdon Autism Strategy 2023*
- *Hillingdon Family Hub Strategy*



- *Hillingdon Council Carers Strategy 2023-2028*
- *Hillingdon Early Help Strategy 2021-2025*
- *Hillingdon Safeguarding Children Education Inclusion Toolkit*
- *Hillingdon Safeguarding children and young people with complex needs and disabilities*
- *Hillingdon SEND Sufficiency Strategy*

## Greenbelt

The southeast corner of the application site and part of the Aviation House building is in Green Belt, which extends to the south and east of the site across open fields.



Above: Map of London Greenbelt.

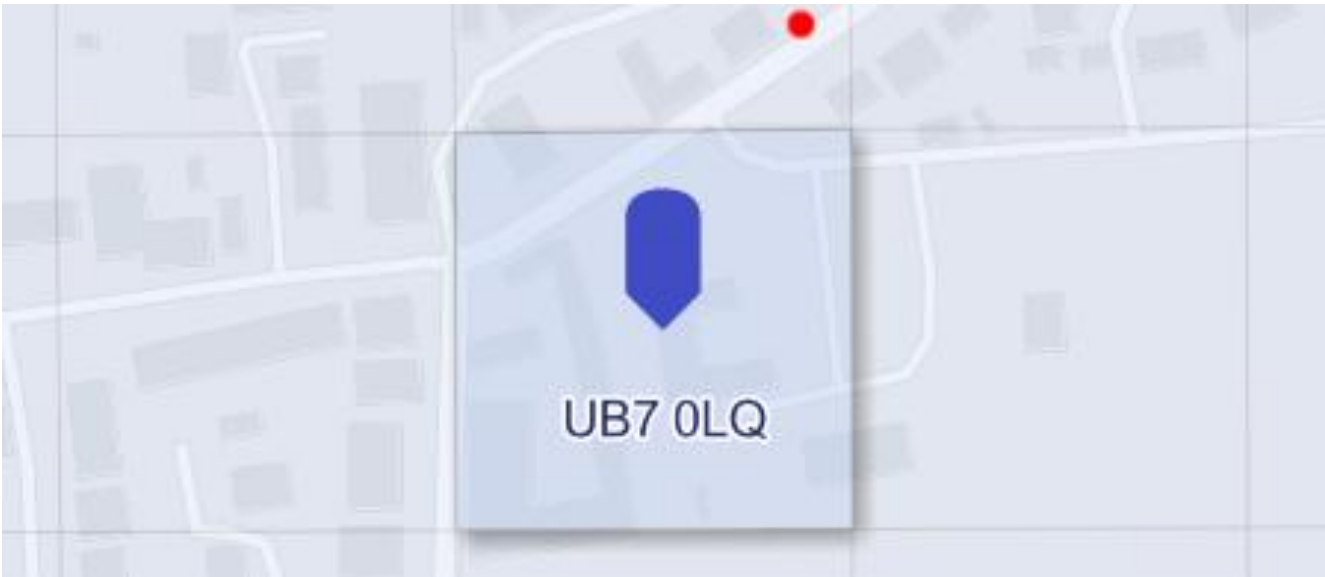
Source: CPRE Website

## Archaeology

The site is within two Archaeological Priority Areas (Heathrow APZ and Harmondsworth APA).

## Transport PTAL Rating

The site is located within an area with a PTAL Rating 1b.



Above: Map of the area by PTAL Ratings.  
Below: Key of PTAL Ratings.

Source: Transport for London PTAL WebCAT



Map layers  
PTAL (cell size: 100m)

5.0 PLANNING HISTORY

A planning history search using the London Borough of Hillingdon Council’s website reveals that there are numerous planning applications relating to the application site between 1976 and 2025.

Table 6: The Site Planning History		
Application Ref	Application Description	Decision
2157/H/80/1976	<b>The Annex</b> Extension/Alterations to Office premises of 1192 sqm.	Refused (03/02/1981)
2157/H/80/1976 - Appeal	<b>The Annex</b> Extension/Alterations to Office premises of 1192 sqm.	Granted (16/06/1982)
2157/AN/90/2105	<b>The Lodge (Listed Building Consent)</b> Erection of a two-storey extension with glass pyramid roof and associated car parking (Application for Listed Building Consent)	Granted (01/02/1991)
2157/AM/90/1920	<b>The Lodge</b> Erection of a two-storey extension with glass pyramid roof and associated car parking (Application for Listed Building Consent)	Granted (01/02/1991)

2157/AP/95/1818	<b>The Lodge (Listed Building Consent)</b> Application of anti-climb paint to the top of boundary wall (Application for Listed Building Consent)	Granted (22/01/1996)
50509/95/1883	<b>Aviation House</b> Erection of a two-storey office building comprising 690m2 floorspace with associated landscaping and parking	Granted (01/02/1996)
2157/AR/96/1838	<b>The Lodge (Listed Building Consent)</b> Erection of replacement iron gates (Application for Listed Building Consent)	Granted (24/01/1997)
2157/AS/96/1839	<b>The Lodge</b> Erection of replacement iron gates	Granted (24/01/1997)
2157/APP/2016/2297	<b>The Annex</b> The change of use of the upper ground and first floor of The Lodge and the ground floor of the Annexe building from office (Use Class B1a) to non-residential education centre (school) (Use Class D1).	Withdrawn (22/09/2016)
2157/APP/2023/3068	<b>Aviation House</b> Change of use of the building from office (Use Class E) to non-residential education centre (SEND school) (Use Class F1) with external alterations including installation of two canopies, gates, fences, bin and cycle stores, and associated landscaping works	Granted (18/04/2024)

The most recent planning application is of the most significant in that it forms a precedent that the use of an SEND School at the site is both an appropriate and effective use of the land. Particularly, in a declining market and interest for commercial office space in this location. The application also forms the basis of many key areas of policy acceptability including noise, and transport.

## 6.0 PLANNING POLICY FRAMEWORK

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise. The statutory Development Plan for the application site comprises the adopted *Hillingdon Local Plan: Part 1- Strategic Policies* ("Local Plan" adopted 2012).

The Council, are preparing a new Local Plan known as "Local Plan Part 2", which, once adopted Once adopted, it will deliver the detail of the strategic policies set out in the Local Plan Part 1. The plan has been through examination phase and was reviewed by the Secretary of State on 18 May 2018 to begin the examination in public phase. The Inspector's Report was provided on 22 October 2019. As the Local Plan is emerging it is considered that some weight can be given to the Local Plan at this stage.

The Mayor of London published *The London Plan* (adopted March 2021) which is a revised version of the document that was previously published, to replace its predecessor. The Plan is part of the statutory development plan for Greater London. The London Plan also presents the planning policies for the region including how they are expected to be applied. The planning

policies in The London Plan need to be met and should inform decisions on planning applications.

The Ministry of Housing and Communities Local Government (now the Department for Levelling Up, Housing & Communities) published the revised *National Planning Policy Framework* (NPPF) in December 2024, which sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is supported by the National Planning Practice Guidance (NPPG) which provides more detail to the policies of the NPPF. The NPPF and NPPG are material considerations in the determination of planning applications and appeals.

The relevant Supplementary Planning Documents (SPDs) and Guidance, like *The West London Waste Plan (2015)* is also material considerations in determination of planning applications and appeals.

### **List of Policies:**

#### ***NPPF***

- Chapter 2 Achieving sustainable development
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed and beautiful places
- Chapter 13 Protecting Green Belt land
- Chapter 16 Conserving and enhancing the historic environment

#### ***London Plan***

- Policy D13 Agent of Change
- Policy D14 Noise
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy G2 London's Green Belt
- Policy HC1 Heritage conservation and growth
- Policy S3 Education and childcare facilities
- Policy G5 Urban greening
- Policy T1 Strategic approach to transport
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T6.5 Non-residential disabled persons parking

#### ***The Local Plan: Part 1 – Strategic Policies (2012)***

- Policy BE1 - Built Environment
- Policy CI1 - Community Infrastructure Provision
- Policy E1 - Managing the Supply of Employment Land
- Policy E3 - Strategy for Heathrow Opportunity Area
- Policy EM2 - Green Belt, Metropolitan Open Land and Green Chains
- Policy EM8 - Land, Water, Air and Noise
- Policy HE1 - Heritage

## **Hillingdon Local Plan: Part 2 - Development Management Policies and Emerging Local (2020)**

- DMCI 1A Development of New Education Floorspace
- DMCI 2 New Community Infrastructure
- DMCI 7 Planning Obligations and Community Infrastructure Levy
- DME 2 Employment Uses Outside of Designated Sites
- DME 3 Office Development
- DME 4 Development on the Green Belt or Metropolitan Open Land
- DMEI 2 Reducing Carbon Emissions
- DMEI 4 Development in the Green Belt or on Metropolitan Open Land
- DMEI 14 Air Quality
- DMHB 1 Heritage Assets
- DMHB 2 Listed Buildings
- DMHB 3 Locally Listed Buildings
- DMHB 4 Conservation Areas
- DMHB 5 Areas of Special Local Character
- DMHB 7 Archaeological Priority Areas and Archaeological Priority Zones
- DMHB 11 Design of New Development
- DMHB 14 Trees and Landscaping
- DMHB 15 Planning for Safer Places
- DMT 1 Managing Transport Impacts
- DMT 2 Highways Impacts
- DMT 5 Pedestrians and Cyclists
- DMT 6 Vehicle Parking

## **7.0 PLANNING CONSIDERATIONS**

### **Summary**

The key planning considerations that relate to this development are:

- Principle of development:
  - Greenbelt;
  - Education;
  - Town Centre;
  - Offices (Use Class E);
  - Loss of Employment;
  - Proposed SEND School;
  - Sustainable Development;
  - Archaeology;
- Heritage and conservation;
- Noise; and
- Transport.

In addition to the above the below the following areas have also been covered.

- Design;
- Air Quality;
- Refuse;
- Energy & Sustainability;
- Fire Safety;
- Trees and Landscaping;

- Archaeology;
- Contamination.

## **Principle of Development**

### ***Policy: Greenbelt***

This section considers the loss of office space, the change of use to education, and the modest extremal alterations on land designated as a Green Belt.

The National Planning Policy Framework ('NPPF', adopted December 2024) in Chapter 13 attaches great importance to Green Belts. Green Belt policy aims to prevent urban sprawl by keeping land open permanently. Furthermore, applications in within the Greenbelt, should protect the 'openness' and 'permanence' of the Greenbelt.

The London Plan reaffirms this position in Policy G2 which states that planning authorities should protect the Green Belt from inappropriate development. Moreover, Development proposals that would harm the Green Belt should be refused except in very special circumstances. The policy further states that openness and permanence are essential characteristics of the Green Belt.

The London Borough of Hillingdon Council's Local Plan Part One Strategic Policies makes clear in Paragraph 8.20 that, the most crucial attribute of Green Belts is their openness.

Hillingdon Council's Local Plan Part Two Development Management Policies support this position. Policy DME1 4 states, inappropriate development in the Green Belt will not be permitted unless there are very special circumstances.

The proposed development for the most part does not include any additional development than what has been approved as part of the application at Landon School (previously referred to as 'Aviation House') under the Council's application reference of 2157/APP/2023/3068 which included modest building and landscape works. For the most part the proposal seeks to reduce some of these elements that were previously approved as the expansion of the school into a campus has meant that they are either surplus to or have been repositioned elsewhere on the Site.

One area where there has been a reduction in proposed works since the previously approved application, is the pedestrian and cycle path which was positioned to the west of The Lodge and The Annex. It was proposed at that time to specifically serve the new school as a sustainable method of transportation, at a time when the wider site had a multi-use as both education and offices. Due to the proposal of a site wide school campus, it is possible to reduce this path significantly due to the existing hard surfacing landscaping that exists.

The second element which has been removed from the proposal which is the secured refuse store located in close proximity to Landon School (previously known as Aviation House). This has been removed as the proposal for a new campus is able to use the existing secure refuse store for The Lodge and The Annex which is located near the vehicle entrance to the Site.

It is considered that both the reduction of the 'path' as described above and the removal of a new outbuilding for secure refuse is a significant benefit in improving the special character of the Greenbelt, including the 'openness' of the Greenbelt.

A single additional element for consideration is the proposed fence which runs north-south on the eastern side of both The Lodge and The Annex which, for the safeguarding of the school pupils is essential. This fence has been carefully chosen as a metal bow top fence to be discreet to ensure that it would not harm the 'openness' of the Green Belt. Therefore, it is considered that the proposal presents appropriate development within the Green Belt and meets exception g) of para 154 of the NPPF (2024). The proposal would comply with Chapter 13 of the NPPF, Policy G2 of The London Plan, Hillingdon Council's Local Plan Part One Strategic Policies, and Policy DMEI 4 of Hillingdon Council's Local Plan Part Two Development Management Policies.

### **Policy: Education**

The NPPF Paragraph 100 states:

*It is important that a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*

- a) give great weight to the need to create, expand or alter early years, schools and post-16 facilities through the preparation of plans and decisions on applications; and*
- b) work with early years, school and post-16 promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.*

On this basis, there is a statutory planning requirement to provide for a choice of school places to meet the local needs and the policy requires local planning authorities to take a proactive and positive approach to meeting such needs as part of plan making and decision taking.

In addition, NPPF Paragraph 111(a) states that

*Planning policies should (inter alia) a) support **an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities** [emphasis added in bold text].*

Policy S3 of The London Plan pertains to education facilities. Development proposals for education and childcare facilities should be located in areas of identified need; in accessible locations, with good public transport accessibility and access by walking and cycling; locate entrances and playgrounds away from busy roads, with traffic calming at entrances; link to existing footpath and cycle networks; maximise the extended or multiple use of educational facilities for community or recreational use; encourage the shared use of services; ensure that new developments are accessible and inclusive for a range of users; ensure that facilities incorporate suitable, accessible outdoor space; locate facilities next to parks or green spaces, where possible. Paragraph 11.1.34 states that 'there is a growing need for school places in London.' Paragraph 5.3.6 further states that 'there is a need for an increase in Special Educational 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.'

The Planning Practice Guidance ('PPG') explains (Reference ID:53-007-20190722) how plan-makers can assess the need and demand for school places. It states that local authorities with education responsibilities forecast the need for new school places and report this to the government through an annual school capacity survey. These forecasts consider natural population change such as birth rates, the effects of parental choice, and estimate additional needs from new housing with reference to pupil numbers from recent developments and other evidence.

In addition, the PPG (Reference ID:53-008-20190722) explains how local plans should seek to allocate land for education:

*Plans should seek to meet the development needs of their area, including community facilities such as schools. They should, at the most appropriate level, **allocate sufficient suitable land for schools to meet the need anticipated over the plan period, taking into account needs that may cross local authority boundaries.*** [emphasis added in bold text]

The PPG requires local plans to allocate land for educational purposes to meet the needs within the local area as well as to take account of needs that may cross local authority administrative boundaries.

The Policy Statement, *Planning For Schools Development* (2011) sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system. According to this statement:

*The Government believes 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 (inter alia) principles should apply with immediate effect:* [emphasis added in bold text]

- *There should be a **presumption in favour of the 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. The Secretary of State will attach significant weight to the need to establish and develop state-funded schools when determining applications and appeals that come before him for decision.***
- ***Local authorities should make full use of their planning powers to support state-funded schools applications.***
- *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. Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence.***
- ***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.***

Part 1 of the Local Plan, Policy CI1: Community Infrastructure Provision: states the Council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs

of the existing community and future populations by: (3) Supporting extensions to existing schools and the development of new schools and youth facilities.

Policy DMCI 1A (Development of New Education Floorspace) states proposals for new schools and school expansions will be assessed against the following criteria:

- a. The size of the site, its location and suitability to accommodate a new school or school expansion taking account of compatibility with surrounding uses, and existing planning policy designations (e.g. conservation areas, MOL, Green Belt).
- b. The impact on green open space, games pitches, outdoor play and amenity space, taking account of the character of the area, whether the site is within an area of open space deficiency and whether the school has sufficient outdoor space for play and games.
- c. The location and accessibility of the site in relation to:
  - i. the intended catchment area of the school;
  - ii. public transport; and
  - iii. the local highway network and its ability to accommodate new or additional school trips without adverse impact on highway safety and convenient walking and cycling routes to schools.
- d. The extent to which the building design contributes towards the government target that schools and colleges should be zero carbon from 2016.

The Site is not within a Strategic Industrial Location (SIL), Locally Significant Employment Location (LSEL) or Locally Significant Industrial Site (LSIS). The Local Plan – Part 1 identifies that the Site is located within the Heathrow Opportunity Areas. Within this, Harmondsworth is designated as a ‘key location for offices’. The Site, however, is not identified specifically for offices within the Site Allocations Document.

Hillingdon’s Local Plan Part 2-Development Management Policies, policy DME 2 states that the loss of non-designated employment sites will only be allowed where it can be shown that the Site is unsuitable for employment uses and there will be no adverse impact on the Site and its surroundings. In order to strengthen the case for this application, on behalf of the applicant, marketing information has been submitted as part of the application documentation.

The recently approved application for a SEND school at Landon School (previously known as ‘Aviation House’) under the Council’s application reference of 2157/APP/2023/3068 provides a precedent. It is within this application the Council’s Policy Team when consulted stated that ‘the use of the site as a SEND school is generally supported by policy.’

### ***Policy: Town Centre, Offices, and Loss of Employment***

The current use of the Site is office use. Paragraph 90 of the NPPF lists office use as a main town centre use. *Chapter 11: Making effective use of land* of the NPPF makes clear in paragraph 128 ‘Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.’ Subheading b) of the same paragraph further states that ‘schools and hospitals’ are key examples of uses for this, ‘...provided this maintains or improves the quality of service provision and access to open space (Para. 128b)’.

In assessing the appropriateness of the proposed school use, consideration is given to the loss of the employment use on the Site.

Policy E1 of The London Plan states that office markets in outer London should be consolidated and, where viable, extended, 'focusing new development in town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity and capacity' including, other town centre office locations, existing urban business parks, and locally-oriented, town centre office provision to meet local needs.

Policy DME 3 of Hillingdon Council's Local Plan Part Two Development Management Policies states that the Council will support proposals for new office development in the preferred locations. Paragraph 2.14 states that Policy E2 of Hillingdon Council's Local Plan Part One Strategic Policies' OREPDEL (ODB 2022) 18 of 26 directs office development to three core growth areas: Uxbridge Town Centre, Stockley Park and Heathrow Perimeter. In addition, office development will also be considered suitable in designated town centres and Locally Significant Employment Locations (LSEs).

The Council should not hold objection to the loss of this vacant office space outside of a town centre, designated office growth area, and LSEs. The proposed loss of office space in this locality would comply with Paragraph 90 of the NPPF, Policy E1 of The London Plan, and Policy DME 3 of Hillingdon Council's Local Plan Part Two Development Management Policies.

The recently approved application for a SEND school at Landon School (previously known as 'Aviation House') under the Council's application reference of 2157/APP/2023/3068 provides a precedent establishing the principle of development in this context and location.

The Site has been actively marketing by Telsar. The headline considerations are as follows:

- The premises was previously occupied by various small companies which let individual rooms at both The Lodge and The Annex.
- The Annex is currently a vacant building with zero interested parties and zero offers made.
- The Lodge is partially vacant however, all of the tenants are either at the end of their term and are able to serve their notice, or nearing the end of the end of their contractual term with zero interest in extending the contract period.
- Telsar were instructed to market the building in 2022 and received no serious enquiries until the Applicant expressed an interest. The marketing has continued.
- Telsar have marketed the properties via Marketing Brochure's, Marketing Board's, Online Listings, Telsar Website, Office Agents Society, and HTML Email Marketing.
- The premises have been marketed as an E class office.
- Telsar are experts in the south east office market and have a strong representation in the local area. Marketing details attached.
- Marketed on a leasehold basis only as the owner has no wish to sell the freehold. Quoting rent has been in line with current values and is a true/proper reflection of the rental market as at today's date.
- The HTML email marketing was sent to approximately 8,000 applicants on Telsar's internal and external databases, containing key property details and images.

In marketing the above premises, Telsar has not been able to generate any significant interest. It is believed that the location does not provide a high footfall, and demand in such locations has reduced in recent years, without showing signs of recovery. This has demonstrated a lack

of long-term demand for employment use on the Site and would be consistent with the recognised economic downturn that has been experienced in recent years and is still largely present across the nation.

The existing commercial floorspace is considered unlikely to contribute significantly to the employment floor space within the locality and London Borough overall. It is recognised that premises may be vacant for the short to medium term and by requiring marketing over an extended period of time this should ensure the long-term health of Harmondsworth / Hayes commercial areas.

Ongoing regeneration of the local environment and stimulation of the local economy would, it is considered, now be likely to derive the greatest benefit from the buildings on the Site becoming occupied at the earliest opportunity, regardless of whether this is for educational use.

It is considered that the occupation of commercial premises, as proposed, would have greater immediate beneficial impact than retention on the basis only of hope and for a further potentially lengthy period of the empty floorspace, or its interim use for some low-key commercial use.

These arguments are considered to be 'other appropriate evidence'. Having regard to such, it is considered that the particular circumstances of this Site, in terms of both physical and planning constraints, are such that the loss of the Site for employment generating purposes would be justified.

In addition to this, the expansion of the school will employ up to 66 employees which equates to more persons than is currently present on the Site.

### ***Policy & Legislation: Proposed SEND School***

The Children and Families Act 2014 introduced a new system to help children with SEND by setting out specific duties on schools in relation to identifying and supporting all children with special educational needs whether they have an Education, Health and Care Plan in place:

- Section 19 of the Children and Families Act 2014 makes clear that local authorities, in carrying out their functions under the Act in relation to disabled children and young people and those with SEND, 'must have regard to':
- The views, wishes and feelings of the child or young person, and the child's parents;
- The importance of the child or young person, and the child's parents, participating as fully as possible in decisions, and being provided with the information and support necessary to enable participation in those decisions; and
- The need to support the child or young person, and the child's parents, in order to facilitate the development of the child or young person and to help them achieve the best possible educational and other outcomes, preparing them effectively for adulthood.

Local authorities must consult children with special educational needs or disabilities, their parents, and young people with special educational needs or disabilities in reviewing educational and training provision and social care provision and in preparing and reviewing the Local Offer. It is important that they participate effectively in decisions about support available to them in their local area.

The Act governs identification, assessment and provision for children and young people with additional needs and also includes the SEND Code of Practice (2015), which contains the law

as well as statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities on how and when a child or young person will need additional support.

Chapter 3, and in particular Paragraphs 3.27 and 3.28 of the Code discuss the appropriate information and data-sets that need to be considered to understand and predict the need for services, which include the data that ECC holds such as numbers of local children with an Education, Health and Care Plans (see paragraph 3.4 below), where children or young people with SEN or disabilities are educated locally, prevalence data for different kinds of SEN and disability among children, young people and more.

The Code also details the requirements of a 'joint review to improve serviced offered' (paragraphs 3.42 to 3.44) which includes:

*Local authorities must review the special educational provision and social care provision in their areas for children and young people who have SEN or disabilities and the provision made for local children and young people who are educated out of the area, working with the partners to their joint commissioning arrangements.*

In addition, the code sets out the need for local authorities to co-operate with the relevant organisations. This is set out in Paragraph 4.14 below:

*Local authorities and their partner bodies and agencies must co-operate with each other in the development and review of the Local Offer. This is essential so that the Local Offer provides a comprehensive, transparent and accessible picture of the range of services available.*

Moreover Paragraph 4.14 also sets out that, to ensure that the sufficient provision is met the local authorities must continue to review their offering.

*Local authorities must keep their educational and training provision and social care provision under review and this includes the sufficiency of that provision. When considering any reorganisation of SEN provision decision makers must make clear how they are satisfied that the proposed alternative arrangements are likely to lead to improvements in the standard, quality and/or range of educational provision for children with SEN.*

Section 35 (b), Education Act, 1996 provides the legal and statutory guidance relating to school transport, including guidance for SEND pupils.

In March 2023, the government published the *Special Educational Needs and Disabilities (SEND) and Alternative Provision (AP) Improvement Plan*. This followed the consultation on the March 2022 Green Paper which set out the government's proposals to improve outcomes for children and young people; improve experiences for families, reducing the current adversity and frustration they face; and to deliver financial sustainability. Many respondents to the consultation reported that the need for specialist provision exceeds the available places.

In this context, the Improvement Plan sets out the next steps in a multi-year programme to deliver this improved system including delivering capacity to address current supply issues. Specifically, the government makes clear on Page 19 of the document that:

*In the short to medium term, we will take action to address supply issues – ensuring that there is sufficient support available for children and young people when they need it, in the most efficient way. This includes investing £2.6 billion between 2022 and 2025 to deliver new places*



*and improve existing provision for children and young people with SEND or who require alternative provision, reducing the need for costly independent provision.*

To summarise, the ambition and need for SEND school's by both national and local government is unequivocal. Therefore, the change of use for an SEND educational school should be supported. Moreover, the recently approved application for a SEND school at Landon School (previously known as 'Aviation House') provides a precedent.

### ***Policy: Sustainable Development***

The expansion of the school will make the development more sustainable through the sharing of facilities, transport, staff (employees) as well as useable area for the school's operation. Achieving sustainable development (Chapter 2, NPPF) is a clear 'purpose of the planning system' and the National Planning Policy Framework. Paragraph 8 of the NPPF sets out three objective's for achieving sustainable development. These are as follow:

- a) an economic objective
- b) a social objective
- c) an environmental objective

The proposed application to expand of Landon School represents all of the hallmarks of these objectives.

- Economic objective; as the enlarged school make reduce cost overheads of operating the school. Making the cost per student more effective through increased efficiencies.
- Social objective; as the purpose of the application is for a school, in particular to cater for children with Special Educational Needs & Disabilities (SEND).
- Environmental objective; as the increased economic efficiencies and operation of the school can provide the financial means necessary to make much needed upgrades to the Grade II Listed building (The Lodge), and install environmental (carbon reduction measures) to the building's generally.

In addition, the NPPF (Paragraph's 10 and 11) state that there is a 'presumption in favour of sustainable development'. Thus, 'sustainable development' should be supported from the outset. Moreover, *Chapter 4: Decision-making* of the NPPF goes further to state that 'Decision-makers at every level should seek to approve applications for sustainable development where possible' (Para. 39).

Sustainable Development which *Chapter 12: Achieving well-designed places* of the NPPF (2024) makes clear in Paragraph 131 that the 'creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve'.

This application represents the core purposes of the planning system and the NPPF. Therefore, it should be supported from the outset with the necessary measures taken by the Local Planning Authority to support and approve the proposal.

## **Heritage & Conservation**

The site contains Listed Buildings and has designated heritage assets in the local area. This includes:

- The Lodge, Grade II Listed Building (Listed Entry No.: 1080217)
- Wall to the east of the Lodge, Grade II Listed Building (Listed Entry No.: 1080218)
- *Home Farm buildings*, Locally Listed Buildings (local context – outside the red line site boundary)
- Harmondsworth Village Conservation Area

The presence of these heritage assets require an assessment to be undertaken. A *Heritage Statement* has been undertaken by *Cogent Heritage* to accompany the planning application. The report assesses each of the heritage assets and the 'setting'. Furthermore, the Heritage Statement goes on to assess the impact of the proposed on the heritage assets using policy, legislation, planning practice guidance, as well as the guidance set out by Historic England. The Council should refer to the Heritage Statement for the specific details regarding the heritage assessment. A *Design & Access Statement* prepared by *CREATE Design+Architecture* has also been included as part of this application to outline and make clear the proposed changes to the site and the heritage assets. Site photographs can be found throughout these documents.

A summary of the heritage & conservation is set out below including some of primary planning considerations.

### ***Planning Policy, Legislation and Guidance***

When dealing with development that within or adjacent to a conservation area and that involves the setting of listed buildings, the Council must follow a hierarchy of legislative tests and guidance. In this instance, these are, in diminishing order of importance:

- S66 and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990;
- National Planning Policy Framework (NPPF) (March 2023); an LB Merton Core Strategy and Sites and Policy plan.

Other material considerations include the National Planning Practice Guidance (NPPG).

Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (LBCA) states that in considering applications which affect Listed Buildings, special regard must be had to the desirability of preserving or enhancing its setting or any features of special architectural or historic interest which it possesses.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering applications within a Conservation Area, Local Planning Authorities must pay special attention to the desirability of preserving or enhancing the character and appearance of the area.



In accordance with the NPPF, applicants are required to assess the impact of any new development on any heritage assets affected. The NPPF states that 'the level of details should be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance.'

Due to the Grade II Listed buildings present on the site as well as the site's location being within the Harmondsworth Village Conservation Area, the Council will seek to ensure that any development preserves or enhances the heritage status (saved policies BE4 – BE12 and draft policies DMHB 1-4). Therefore, proportionate consideration is to be given to the potential impact of the proposed development on the conservation area and the Listed Building.

### ***The Lodge***

The Lodge being a Grade II Listed Building the Listed Building entry number of 1080217. As a result, this application has been submitted in parallel with an application for Listed Building Consent (LBC).

The Lodge was built as a Georgian House, in the early to mid-19th Century. The existing use of the building is as open plan offices, in which businesses individually let rooms and have some common facilities such as a kitchen and WC's. The building is only partially occupied with many of the rooms being vacant.

The building is believed to have undergone various changes and alterations since it was originally built. This includes the subdivision of some rooms, the introduction of plumbing and sanitary facilities arising from a period when the building was converted from a residential house to an office building. The southeast of the building has had a flat-roofed late-C19 sizeable extension which is described as a 'crude' addition. In general the building has not experienced much renovations over the past 30 years and there is opportunity for the historic building to be enhanced through development.

The proposed changes to the building have been proposed to protect and enhance the character of the Listed Building whilst also providing the necessary facilities for the building to be used as a SEND school. Key examples of this are the proposed removals of internal partition walls on; the lower ground floor, the ground floor, and first floor. These walls are understood to not be part of the original historic building. Therefore, it is considered that the removal of these internal walls will enhance the building's historic and heritage value.

### ***Lower Ground Floor***

The building's lower ground floor could be described as the most neglected area of the building. It has a large expansive space but has had minimal value as the use of offices, due to the lack of light and less window's by comparison to the upper floors. The proposal seeks to make significant improvements by utilising this large area as a staff area for the school. To do this the scheme proposes to construct additional partition walls and plumbing works for WC's. Internal walls are proposed to be removed on the east side to reinstate the room into how the building was originally built. In doing so, a large room will be created for the staff to use. On the southeast corner a kitchen is proposed for the staff to use. The location of the kitchen has been carefully considered to utilise the existing plumbing that exists to serve the Ground Floor WC's. Some

new internal partition walls have been proposed in this area to enclose the kitchen for fire safety whilst also creating two new staff rooms. The western side of the lower ground floor is largely unchanged. All area's that are considered to be of historic or heritage significance are sought to be preserved with no changes.

### *Ground Floor*

The Ground Floor proposal is minimal to preserve the historic nature and character of the Grade II Listed Building. Two internal partition walls in the southeast are proposed to be removed. It is our understanding that these walls are not original and were installed as part of the flat roof C19 extension which was added to the building. Thus, holding no historical or heritage value.

The WC's on this floor are not an original part of the building and were likely installed at the time that the building was converted from a residential dwelling house to offices. It is part of the proposal to renovate these WC's with new sanitary wear, cubicles, and lino flooring.

The existing kitchen on this floor is not original and therefore does not hold historic significance or heritage value. It is proposed as part of the proposal that a new kitchen is installed that can be used by the students. This includes new kitchen units, plumbing fixtures and pipework.

A partition wall and door is proposed in the central east west corridor. This addition is integral to the change of use of the building. For the reasons that, the office/ reception is located on the west side of the building which is accessible to visitors via a footpath. It is essential that the school can fulfil its duties of safeguarding the pupils. This partition wall in the corridor and door will create separation from visitors and will have a controlled staff access. The location of this partition wall and door has been carefully located to allow circulation access. This includes ensuring that the direction of the new proposed door opening does not obstruct the means of escape in the event of a fire.

An additional proposed wall is proposed in the storage cupboard under the stair. The location of this wall has been considered to ensure that the wall does not cause 'harm' or intersect with the staircase which is viewed to of historic importance to the building.

### *First Floor*

The most proposed changes to the Listed Building are on the First Floor. The proposed changes largely centre on the need for WC's on this floor to facilitate the new proposed use of the building as an SEND school. The WC's have been carefully located in the central part of the building in a existing circulation area which is considered to hold not historic value. This is proposed with the acute awareness that historic value can be portioned to a lesser or greater degree for all the other rooms on this floor. The WC's are also located in a location where they can be installed with ease, due to the Ground Floor WC's being located in the same location. In installing these WC's and the new partition walls that are associated a new storage room has been proposed and the creation of an additional specialist classroom, as well as a rationalised fire strategy which utilizes the external staircase. These proposed works involve the loss of two internal walls at the south of the building. These walls are not considered to be original as they are believed to be part of the C19 extension.

Other minor alterations have been proposed. This includes a wall between the proposed store cupboard and large classroom on the west of the building. The proposed wall has been created

to retain the existing opening and designed to be constructed in a method that causes no harm to the Listed Building and could be removed with ease in the future without causing harm. A balustrade is also proposed on the roof terrace for safety reasons. However, the balustrade will not be able to be seen from the street level to impact the Listed Building's appearance. Moreover, the balustrade is located on the C19 extension which holds no heritage significance.

### *The Site ('Setting')*

There are several proposed alterations and elements to the site. These include a perimeter fence to separate the car park and the proposed school to ensure the safety of the pupils. For this reason, it is an essential part of the proposal to facilitate the change of use of the building from offices to a school. The proposed fence is located on the east side of the Lodge and The Annex and runs north-south abutting (but not joined) to the Wall to the east of the Lodge (Grade II Listed Building: Entry No. 1080218). This fence has been carefully chosen as a metal bow top fence to be discreet to ensure that it would not cause less than substantial harm to the heritage assets. A metal bow top fence is also proposed on the west side of the building that runs east-west between the existing substation and The Lodge restricting visitors from the children for safeguarding.

In addition to the fence a hard and soft landscaping proposal has been developed which involves general improvements to improve the 'setting' of the Listed Building's as well as some new additional footpath's to safely allow people to navigate the site with ease. A path is proposed in the carpark to allow access to the proposed disabled parking space (blue badge holders), and two new footpaths to allow movement between the playground at Landon School (formerly Aviation House) and the expanded campus, as well as a path to allow improved flow of people between the forecourt of The Lodge (east side) and The Annex courtyard.

To improve the building accessibility for pedestrians a Permeable Tarmac with Gravel Finish and Kerb Edging has been proposed to the western side of The Lodge. This will replace the existing gravel path. The proposed tarmac has been carefully chosen to match the existing materials as much as possible to ensure that there is no harm to the 'setting' of the listed building. It is important that a tarmac path is proposed in this area as the existing gravel can be a safety issue for school children, particularly those with Special Education Needs and Disabilities. The new proposed path's and landscaping has been designed carefully to create a campus and a cohesive masterplan for the school in operation.

As part of this proposal new Cycle Store Shelter for 20 bicycles is proposed on the west side of the site located near The Annex. The position of the Cycle Store in this location has been carefully placed to ensure that it does not cause harm to the 'setting' of the Listed Buildings. and accessed by the northwest pedestrian entrance to the site. A single short stay Sheffield bike stand is proposed by the throughway between The Lodge and The Annex (east side of the building).

### ***The Harmondsworth Village Conservation Area***

The Conservation Area Appraisal notes that this conservation area is characterised by its historic core which grew up in the Medieval period at the gate of the Benedictine Priory. The

earliest building to survive is the Listed Grade II\* St Mary's Church, parts of which date from the 12th century.

The village centre, around The Green, has a mixture of medieval and post medieval buildings and beyond this core more recent developments have been built, the majority appearing in the 1960's/1970's. The Great Barn, to the north-west of the Site is a standing survival of the Medieval period, dated to 1426. Many other structures in the village are from the Post-Medieval period.

The proposal is for a change of use to the buildings known as both The Lodge and The Annex. As a result, there are no changes to the exterior of the buildings that could have the potential to cause harm to the conservation area. Minor changes are proposed to the site plan as described previously in this report. However, all of these elements are essential for the change of use of the building from office to educational use. Furthermore, the materials and products have been carefully selected to ensure that there is no harm to the heritage assets including the Harmondsworth Village Conservation Area.

## **Archaeology**

The site is within two Archaeological Priority Areas (Heathrow APZ and Harmondsworth APA).

Policy 16 of the NPPF states that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Policy HC1 of the London Plan states that, where applicable, development should make provisions for protecting significant archaeological assets and landscapes.

Policy DMHB 7 of Hillingdon Council's Local Plan Part Two Development Management Policies states that the Council will ensure that sites of archaeological interest are not disturbed. If disturbance cannot be avoided, developers must take satisfactory measures to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving, and reporting of any archaeological finds.

Historic England's Greater London Archaeological Advisory Panel (GLAAS) defines developments without basements on sites with areas of less than 0.5 hectares as 'very minor'. 'Very minor' developments in Tier 1 APAs would have medium risk, while developments in Tier 2 and Tier 3 APAs would have negligible risk. Negligible risk means 'developments only rarely causing harm to heritage assets of archaeological interest and hardly ever causing significant harm.'

Historic England advises local authorities to consult GLAAS on 'householder and equivalent-scale very minor applications in APA tier 1 only.' They added a note to state that 'For boroughs as yet 23 of 26 OREPDEL (ODB 2022) without APA tiers, do not consult GLAAS on householder or equivalent applications unless within 50m of a scheduled monument.'

Notwithstanding the above policies, the application is primarily centred on the change of use of the buildings on site (The Lodge and The Annex). Therefore, minor dig works are limited to landscape alterations. As such, it would be smaller in scale than that of a typical householder application. It is our understanding that Hillingdon Council does not yet have APA tiers and the site is not within 50 metres of a scheduled monument. Thus, it is not referable to GLAAS.

As groundworks are minimal and the scheme does not meet the threshold for GLAAS assessment and comment, it is our view the proposal is acceptable in the context of Policy 16 of the NPPF, Policy HC1 of the London Plan, and Policy DMHB 7 of Hillingdon Council's Local Plan Part Two Development Management Policies. The recently approved application for a SEND school at Landon School (previously known as 'Aviation House') can be referred to as precedent.

## **Design**

A Design and Access Statement has been submitted in support of this application which sets out the design rationale for the proposed development. All of the proposed elements have been described previously as part of this report within the sections pertinent to *Heritage & Conservation* due to the Listed Buildings and the Conservation Area.

Internal changes are proposed to The Annex, however this is not considered to be a material consideration as the building does not have any statutory designations and does not create any issues of overlooking to neighbours due to the large amount of screening that surrounds the Site. Nonetheless, details of the proposal for The Annex can be found on the proposed drawings and described within the Design & Access Statement.

As previously described there are no changes proposed to the external elevations of the buildings. Therefore, the character and appearance will remain as existing.

In addition to the above, the change of use and minor building and landscape alterations would not impact residential amenities, daylight and sunlight of adjacent properties, and open space or create an increased sense of enclosure or loss of outlook.

## **Transport**

A *Transport Statement* has been prepared by *Kronen Ltd* to accompany this planning application. It sets out both the rational and reasoning of all aspects relating to transport and highways. It also identifies and assesses the proposal in combination with planning policy and policy guidance by the County Highway's Authority.

For planning decision making in relation to transport and highways matters the NPPF is explicitly clear. It states that, 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe' (Para. 116). For the reasons set out in this section of the



report does not equate to a 'severe' impact in policy terms and therefore should be considered as acceptable in highways terms.

The site wide proposal includes 68 car parking spaces including; 3 Accessible car parking spaces (Blue Badge Holders), and 4 Electric Vehicle (EV) car parking spaces, as well as a mini bus bay for the school bus. In addition, the site wide proposal will have a total of 30 Long stay bicycle parking spaces, and 6 Short stay bicycle parking spaces. This is considered to be sufficient and in line with the proposed scheme which for a school campus for a site wide capacity of 112 students and 96 members of staff across the campus.

For further detail please r

refer to the Transport Statement accompanied with this application prepared by *Kronen Ltd*.

## **Refuse**

The existing refuse arrangements are located in the north-east corner of the site. It is considered these arrangements are sufficient to cater for both Landon School and the proposed school at The Lodge and The Annex. Therefore, no new refuse arrangements have been proposed.

## **Air Quality**

An *Air Quality Assessment* has been prepared by *Syntegra Group* refer to this report for further details.

Policy SI1 of The London Plan states to tackle poor air quality, protect health and meet legal obligations, the following criteria should be addressed:

- 1) Development proposals should not lead to further deterioration of existing poor air quality
- 2) In order to meet the requirements in Part 1, as a minimum:
  - a) development proposals must be at least Air Quality Neutral.
  - c) major development proposals must submit an Air Quality Assessment.

Policy EM8 of Hillingdon Council's Local Plan Part One Strategic Policies states that the Council will seek to safeguard and improve all land, water, air, and noise quality. All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.

Policy DMEI 14 of Hillingdon Council's Local Plan Part Two Development Management Policies states that development proposals should demonstrate appropriate emissions reductions to sustain compliance with and contribute to meeting EU limit values and national air quality objectives for pollutants. They 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 improving air quality, especially within the Air Quality Management Area.

The application site is in an Air Quality Management Area (Hillingdon AQMA), though the development is not 'major'. The Air Quality Assessment makes clear that the development is not expected to lead to further deterioration of existing air quality. Thus, the proposal would comply with the aims of Policy SI1 of The London Plan, Policy EM8 of Hillingdon Council's Local Plan Part One Strategic Policies, and Policy DMEI 14 of Hillingdon Council's Local Plan Part Two Development Management Policies.

## **Noise**

An *Environmental Noise Survey* and *Noise Impact Assessment* has been prepared by *Syntegra Group* to accompany this planning application. It assesses the baseline noise conditions by undertaking a detailed noise survey. In doing so, it assesses noise arising from the nearby industrial units, road traffic noise levels from the surrounding area, and from aircraft originating from London Heathrow Airport.

The Noise Assessment concludes that with appropriate building fabric, glazing, and mechanical ventilation will meet the required standards to provide a suitable level of noises for the proposed use.

## **Energy & Sustainability**

An *Energy Strategy* and a *BREEAM Pre-Assessment* has been prepared by *Syntegra Group* to accompany the planning application. Please refer to these documents for further information.

## **Fire Safety**

A range of systems and fire protection measures have been proposed as part of the scheme. These are outlined in *the Fire Safety Strategy* undertaken by *Apex Strategies*. The report has evidenced the provisions made for the safety of the school occupants as well as the provision of suitable access and equipment for firefighting. The statement fulfils the requirements as set out in Building Regulations, and the Access and Facilities for the Fire Services.

The Fire Statement makes several recommendations and requirements for the proposal to be compliant. This application seeks to implement these changes to ensure the future safety of the occupants of the proposed school and the existing Landon School (formerly Aviation House). The strategy seeks to use the existing external staircase at The Lodge. In doing so, protection of the external escape stair is required from the unprotected openings (windows / doors) if The Lodge (Building Regulations requirement). Therefore, it is proposed to close off of the boiler room window (high-risk of fire) and for fire rated window to be installed in this location.

Following a planning consent further development will be made during RIBA Stage 4 with Detailed Design. Other relevant guidance documents will also be agreed with the approving authority ahead of submission to the fire service should it be required.

## **Trees and Landscaping**

An *Arboriculture Impact Assessment* has been prepared by *TMA Consulting* refer to this report for further details.

Policy DMHB 14 of Hillingdon Council's Local Plan Part Two Development Management Policies states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity, or other natural features of merit. Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread, and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be 24 of 26 OREPDEL (ODB 2022) provided or include contributions to offsite provision.

The site is within a conservation area and contains 38 trees: one category A tree, 11 category B trees, 23 category C trees, and three category U trees.

For further information, refer to both the *Arboriculture Impact Assessment* and the *Design & Access Statement*. The interventions aim to support local wildlife, improve the overall environmental quality of the site, and contribute to the ecological health of the area as set out in Paragraph 180, Chapter 15 of the NPPF.

## **Contamination**

A Phase 1 Desktop Study and Preliminary Risk Assessment Report has been prepared by *GeoSmart Information Ltd* to accompany this planning application. It assesses by qualitative means the potential nature and extent of contamination from those uses and the environmental risk and liabilities which may affect the site redevelopment. For details, please refer to this report.

## **Flood Risk Assessment & Sustainable Urban Drainage Strategy**

A *Flood Risk Assessment* and Sustainable Urban Drainage Strategy (SUDS) has been prepared by *Syntegra Group* refer to this report for further details.

## 7.0. CONCLUSION

This proposal for the change of use of the building from office (Use Class E) to non-residential education centre (SEND school) (Use Class F1) with minor external alterations including, gates, fences, and cycle stores, and associated landscaping works represents a sustainable and well-considered development that aligns with both national and local planning policies. Moreover, the proposal will allow a vacant office building to be occupied.

The proposal demonstrates a strong commitment to sustainable development, and aligns with the vision of both the London Borough of Hillingdon Council and the Government. The proposal contributes positively to the local area in an area which is suited for educational use. The application enhances and preserves the historic environment and the Listed Building's that are on site and in the local context, including The Lodge, and the Wall East of The Lodge. The proposal protects Harmondsworth Village Conservation Area and achieves the NPPF's objectives in full (economic, social, and environmental).

The transport analysis concludes that the site has the capacity to convert the office buildings to a school which have been demonstrated in the Transport Statement. Moreover, the scheme is compliant with the NPPF.

The noise report concludes that the change of use will not result in significant observed adverse effects, as described by the current PPG Noise. The scheme therefore complies with the main principle of national planning and noise policy.

A Phase 1 – Land Quality Assessment for the Site that given the known history of the Site it is considered unlikely that gross contamination is present within the subsurface. A Phase 2 investigation will be carried out to ensure there is no risk of contamination.

The application is accompanied by supporting documents demonstrating that the development is in accordance with national and local planning policies and guidance. Therefore, it is our firm belief that the proposal should be determined with a positive decision without delay.

We trust the information enclosed is sufficient to enable the application to be validated within the statutory 28-day period, and we look forward to receiving confirmation of this shortly. We look forward to receiving a planning decision within the statutory period of 8 weeks.

Furthermore, it is our understanding that the above details provide the *London Borough of Hillingdon Council* with enough information for the application to be considered and in the

instance that further information is required or sought after we kindly request that the Council do not hesitate to get in contact.

Create Design and Create Planning are the Planning Agent involved in the project. Should the Council require any assistance or additional information they should make contact as soon as possible and a member of staff at Create will respond in a timely manner.

The application is accompanied by supporting documents demonstrating that the development is in accordance with national and local planning policies and guidance.