



Outlook

Re: P_454_The Lodge and The Annex, Harmondsworth UB7 0LQ (App. Ref: 2157/APP/2025/2060)

From Isaac Gatley <Isaac.G@createdesign.org>**Date** Thu 16/07/2026 19:03**To** Wai Hing Tse <Whingtse@hillingdon.gov.uk>

Hi Chris,

Thank you for your email.

I can certainly provide clarification.

1. Parent / carer private car trips

The specialist operator letter dated 16.03.2026 refers to approximately 10% of pupils being dropped off / collected by parents in private cars, whereas the latest AQ technical note refers to nil parent/carers private car trips. Please clarify.

In response to the above, please note a point as context. The document provided on 16.03.2026 was submitted in justification for the required car parking spaces. As you have likely read the document stated that approximately 15 (7 Specialist Subject Teachers + 8 specialist non-teaching professionals) members of staff will likely required. Thus, assuming a total of 30 daily trips.

The Council's Case Officer note, ignored the above, instead drawing on the percentage of the existing school at Aviation House of 27% which inflating the number of staff travelling to 18 and arriving further assumed this would be by car. Thus, the Council assumed a total of 36 daily trips.

In the spirit of being pragmatic and all of the car parking metric being 'approximate' moving the application forward this has not been altered. In the absence of TRICS Data the emphasis on the phrase 'approximate' should be noted. Moving on these inflated numbers assumed by the Council for an additional 3 cars would require 3 car parking spaces. This would remove 3 car parking spaces of the overall capacity of the site. Thus, reducing the anticipated expectation of "approximately 10% of pupils may be dropped off and collected by parents in private cars" stated within the letter from the operator on 16.03.2026.

Note, this 10% quoted by the operator was an 'approximate' as stated in the letter, but future proofing by making allowance that as an independent school (albeit students are state funded) it would have presented itself as unreasonable to suggest to the Council that a small number of pupils 'could' (in theory) be privately funded by guardians / parents. However, to date Landon School to date have 0 pupils that are privately funded. Therefore, 100% of pupils are at present arriving by minibus / taxi. Thus, the Applicant in attempting to be reasoned, and reasonable to the Council presented a generous percentage of 10%. Re-emphasising the point made that the data set is 'approximate' and encouraging the Council to be reasonable to reach a resolution.

Given the existing data of 0 pupil's at the school as being privately funded by parents / guardians and equating to 0 drop offs coupled with the reduced car parking capacity from the Council's inflated data set of 27% staff travelling (removing 3 car parking spaces limiting capacity) it is reasonable from the applicant and the team that 0 trips. Particularly, when a

Travel Plan and Action Plan is applied to reduce trips generally, this was not considered to be overambitious of the school.

2. **Taxi / minibus split**

The earlier transport material indicates that pupil travel would be predominantly by minibus with low levels of taxi travel, whereas the latest AQ technical note refers to a combined figure of 72 pupil taxi/minibus trips per day. Please confirm, if possible, the expected split between:

- *minibus movements; and*
- *taxi / private hire vehicle movements.*

A reminder that It should be re-emphasised that the school does not own minibuses. All minibuses are contracted where appropriate by the respective local authority where pupils reside in an area which a single trip and larger vehicle can be used. All pupil minibuses and taxi's should be excluded from the TEB calculation. Therefore, I do not see further dwelling on this area as fruitful use of time.

In assisting you nonetheless, a reminder that 72 trips for taxi/ minibus trips for the pupils (88 pupils) at the school equates to only 18 vehicle's. However, as set out by the Council in their note in this area there are 4 trips per vehicle.

- 1x morning trip approaching the school
- 1x morning trip departing the school after drop off
- 1x afternoon trip approaching the school
- 1x afternoon trip departing the school to take the pupils home

Mini busses vary in sizes. e.g: Large people carrier often used by taxi services can carry 5-6 pupils. Example of an overlap of the terms 'minibuses' and 'taxi's. This is the most likely vehicles to be used as identified by the Council which in being pragmatic have agreed with. 88 Pupils into 8 vehicles totals 4.8 pupils to illustrate this. Note, that it is further reasonable to say that a 1 larger minibus of carrying 8-12 pupils would be used by a contracted service by the respective local authority. which will in turn change the average of 4.8.

As set out earlier minibuses and taxi's should not be included within the trips as per the *Air Quality Neutral London Plan Guidance* document (2.2 Excluded Development Footnote) states that such trips should not be included (incorrectly not removed from the calculation in the Council's Air Quality Officers document).

Footnote: ¹ *Taxi, delivery and servicing vehicle trips, as well as heavy vehicle trips produced by the operation of an industrial or commercial premises are not covered by Air Quality Neutral. Please see Paragraph 4.1.5 for further information.*

3. **Staff car trips**

The latest AQ technical note refers to 36 staff car trips per school day. Please confirm whether this means 36 two-way vehicle movements per day (i.e. approximately 18 staff arriving by car), and confirm the staff figure to which this assumption relates.

I have covered this above in point 1 (see above).

Kind regards,
Isaac

Isaac Gatley BA(Hons) MArch MSc MRTPI | Associate

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PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL.

From: Wai Hing Tse <Whingtse@hillingsdon.gov.uk>

Sent: 14 July 2026 16:21

To: Isaac Gatley <Isaac.G@createdesign.org>

Subject: Re: P_454_The Lodge and The Annex, Harmondsworth UB7 0LQ (App. Ref: 2157/APP/2025/2060)

Hi Isaac,

Thanks, I did have a nice weekend.

I have initially reviewed the technical note myself. Before I re-consult our air quality consultee, I think it would be beneficial if we could clarify the following transport assumptions, as there appear to be some differences in how these have been expressed across the previously submitted documents.

Current Transport Clarification

On the basis of the latest transport clarification, it is accepted that the Proposed Development would generate some staff car trips. Therefore, it is appropriate to review the Transport Emissions Benchmark position rather than relying solely on the excluded development route.

The transport clarification (see Observations Air Quality 2157_APP_2025_2060 AO 02.07.2026) identifies the following trip assumptions:

- 36 staff car trips per school day;
- nil parent/carers private car trips;
- 72 pupil taxi/minibus trips per day;
- 190 school operating days.

1. Parent / carer private car trips

The specialist operator letter dated 16.03.2026 refers to approximately 10% of pupils being dropped off / collected by parents in private cars, whereas the latest AQ technical note refers to nil parent/carers private car trips. Please clarify.

2. Taxi / minibus split

The earlier transport material indicates that pupil travel would be predominantly by minibus with low levels of taxi travel, whereas the latest AQ technical note refers to a combined figure of 72 pupil taxi/minibus trips per day. Please confirm, if possible, the expected split between:

- minibus movements; and
- taxi / private hire vehicle movements.

3. Staff car trips

The latest AQ technical note refers to 36 staff car trips per school day. Please confirm whether this means 36 two-way vehicle movements per day (i.e. approximately 18 staff arriving by car), and confirm the staff figure to which this assumption relates.

Kind regards

Chris Wai-Hing Tse MRTPI
Senior Planning Officer - Central and South
Planning and Sustainable Growth
Residents Services
Civic Centre (3N/02)
Hillingdon Council



From: Isaac Gatley <Isaac.G@createdesign.org>
Sent: Monday, July 13, 2026 16:38
To: Wai Hing Tse <Whingtse@hillindon.gov.uk>
Subject: Re: P_454_The Lodge and The Annex, Harmondsworth UB7 0LQ (App. Ref: 2157/APP/2025/2060)

Hi Chris,

I am very well and thank you for the kind and understanding email. Likewise, I hope you had a great weekend.

It was my ambition to get back to you sooner. I have received the Air Quality Neutral Technical Note (See attached) from the Air Quality Consultant for both your review and the Council's Air Quality Officer.

Thank you for your words of ambition for pragmatic approach to be taken and with a view of this matter to be resolved for the Committee in early September.

With that in mind would it be reasonable to make the Extension of Time (EOT) for the September Committee Date. For which I suspect the Applicant could agree to. Please let me know regarding this.

I look forward to hearing from you.

Attached Documents:

- *Air Quality Neutral Technical Note prepared by Syntegra Group*

Kind regards,
Isaac

Isaac Gatley BA(Hons) MArch MSc MRTPI | **Associate**

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From: Wai Hing Tse <Whingtse@hillington.gov.uk>

Sent: 09 July 2026 10:25

To: Isaac Gatley <Isaac.G@createdesign.org>

Subject: Re: P_454_The Lodge and The Annex, Harmondsworth UB7 0LQ (App. Ref: 2157/APP/2025/2060)

Hi Isaac,

Hope you are well.

Further to your previous email, I note that you have instructed your air quality consultant to review the Council's Air Quality Officer's comments. It would be helpful if you could share any response or technical input from your consultant, so that this can be forwarded to our Air Quality Officer for further consideration. This may also assist in confirming whether the current damage cost calculation requires any adjustment.

I appreciate your frustration regarding the timing of this issue. However, the air quality matter remains unresolved and the Council will need to be satisfied that the proposal complies with the relevant air quality policy requirements before the application can be reported with a positive recommendation.

That said, I am keen to explore whether there is a pragmatic way forward. If the air quality matter, including any required contribution, can be resolved, it may still be possible to progress the application with a view to reporting it to the next Planning Committee in early September, subject to a reasonable extension of time being agreed.

Kind regards

Chris Wai-Hing Tse MRTPI

Senior Planning Officer - Central and South
Planning and Sustainable Growth
Residents Services
Civic Centre (3N/02)
Hillingdon Council



From: Isaac Gatley <Isaac.G@createdesign.org>
Sent: 01 July 2026 13:37
To: Roz Johnson <RJohnson@hillingdon.gov.uk>
Cc: Wai Hing Tse <Whingtse@hillingdon.gov.uk>; Christopher Brady <CBrady@Hillingdon.Gov.UK>; Matthew Williams <matthew@createdesign.org>
Subject: Re: P_454_The Lodge and The Annex, Harmondsworth UB7 0LQ (App. Ref: 2157/APP/2025/2060)

Dear Roz,

FAO - Roz Johnson, Head of Development Management and Building Control

I hope this email is well received.

I am writing to you to express my deep concern as the Planning Agent for an ongoing application at *The Lodge and The Annex, Harmondsworth UB7 0LQ* under the Council's Planning Reference of 2157/APP/2025/2060. The application is for the following, of which the application was made valid on 31/07/2025:

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.

My deep concern stems from recent emails received from the Area Team Leader, Chris Brady over past few days. It was both mine and the applicants understanding prior to this that all of the aspects of the application had been resolved and that the Case Officer's recommendation was for a planning approval to be determined at Planning Committee scheduled on 17/07/2026. Note, this is nearly a full calendar year from when the application was made valid.

On Wednesday of last week (24/06/2025), an email was received from Chris (Wai Hing Tse) raising concern from the Council's Air Quality Officer seeking mitigation costs of £135,001 from an indicative mitigation calculation, reducing to a draft S106 contribution of £121,500 after applying the current assumed Travel Plan. *Please note: The Council do not publish the comments / objections on the Council's Planning Portal for Transparency.*

Since then, we have acted accordingly by contacting the Air Quality Consultant for their comments. As the position submitted to the Council within the Air Quality Assessment is that the development meets the 'Excluded Development Criteria' (Chapter 2.2, Air Quality Neutral London Plan Guidance - Table 31 of the submitted Air Quality Assessment at the point of validation of the application on 31/07/2025). As you could likely appreciate such costs are severely impacting for a proposal for a SEN School. Therefore, such differences need to be resolved. As mentioned, the Air Quality Consultant, *Syntegra Group* have been contacted accordingly for their input.

Despite the above seeking resolution, the Area Team Leader has today (01/07/2026) unreasonably threatened the application with a decision with a refusal within 7 working days of raising a new concern application on the application.

The Area Team Leader has sighted objections from the *SEN Education Department* and *Transport & Highways* which were understood prior to 25/06/2026 have been overcome through supporting justification. For the avoidance of doubt the summary of these objections is as follows:

- SEND Education Department - The Council are meeting their policy with regards to servicing demand. Established Position: Landon School, are an Independent (private) school which receives pupils from out of borough (i.e: Not within Hillingdon Council) and also services families seeking private family funded education.
- Transport & Highways: Objection regarding the amount of car parking provided. Established Position: The quantum of car parking has been justified which the Case Officer, Chris (Wai Hing Tse) was stated they were satisfied with on 02/04/2026 as the expected modes of travel comparable to those on the previously approved application at the site under App. Ref: 2157/APP/2023/3068 (Note: Required detail was given by email which I have not provided here to avoid replication).

Whilst the input of the Air Quality Consultant has been sought, I have brought to the attention errors for the Air Quality Officer to respond to which have not been passed on by the Area Team Leader, and with no response given. These are as follows:

- The position is that the application meets the 'Excluded Development Criteria' for Air Quality, policy justification has been requested as to why the Council disagree with this position. The Area Team Leader has set out that it is not for the Council to justify themselves and a matter for PINS. This is not a collaborative approach from the Council when two parties are seeking to ascertain the point of difference to overcome the issue.
- The Council's Air Quality position regarding the 'assumed number of trips' is incorrect as it applies a calculation that has been formed on the basis of 'Daily Two-Way Movements'. For which the school is only open in 'Term Time' only. Specifically, 190 school days in a year.

As highlighted, the above information has not been passed on to the Council's Air Quality Officer accordingly.

In addition to the above the Area Team Leader has made the following remarks which are incorrect:

- In respect of Air Quality: *...the introduction of trips associated with a different land use means the development cannot reasonably be considered as having no increase in vehicle movements and those existing trips are not considered relevant to this assessment...*

An 'increase' has to be based on previous position. In Change of Use Applications, it is possible for Trips to decrease or increase from the existing conditions of the site.

- In respect of Associated Costs to mitigate Air Quality: *monetary cost and viability are not material planning considerations.*

'Viability' of development is considered a material planning consideration as per the NPPF.

It is accepted that the above aspect needs to be resolved in advance of a recommendation for the application to go to Planning Committee and therefore could not proceed as planned at committee on 17/07/2026. Moreover, there was an urgency to establish this with timings of putting forward the Council's agenda.

Notwithstanding the above, the threat of a planning decision to refuse the scheme with reference to overcome positions and an unaccommodating timescale to obtain a response from the Air Quality Consultant is unreasonable.

The Agent (Myself) and the Applicant has carried themselves with dignity and has accommodated the Council's delays as well as specific circumstances since the application was made valid on 31/07/2025. On each occasion the Extensions of Time (EOT) have been granted to aid the Council. Including, accommodating the previous Case Officer's, Haydon Richardson's extended absence due to sickness. Moreover, we have sought to be accommodating the change of assigned Case Officers. To date I believe that a total of 5 Extensions of Time that have been requested have all been granted.

I am deeply concern over the recent abrupt position which has been presented today (01/07/2026) to refuse the scheme despite a collaborative approach being taken throughout by the Applicant and Agent. Furthermore, the unreasonable nature of this given the willingness from the Applicant and Agent in seeking to resolve points raised on the application and the continued delays.

I look forward to hearing from you and am hopeful that you can allay my concerns.

Attached is the relevant correspondence for reference.

Yours sincerely,
Isaac

Isaac Gatley BA(Hons) MArch MSc MRTPI | **Associate**



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