

## Landon School, Harmondsworth Lane, West Drayton, UB7 0LQ

**Application Reference:** 2157/APP/2025/2060

### **Application 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.*

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### **Reference**

#### **Comments made by the Transport Planning and Development Officer, Senober Khan as a Statutory Consultee**

**Date of Comments: October 2025 (Received by Planning Agent 26/11/2025)**

This document has been prepared to set out the response to the planning comments made by the Transport Planning and Development Officer which raises concerns regarding:

- Proposed Footpath
- Matters relating to a need for a Travel Plan
- Perceived over provision of parking
- Justification and Design Considerations for the parking arrangement

This statement provides comments sequentially with reference to the Comments made by the Transport Planning and Development Officer.

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### **Planning Response**

#### **Proposed Footpath**

**Consultee Comment:** It is cited that the proposal introduces a new footpath to the Site.

The footpath taken from the northwestern corner of the site is not 'new' or a proposal of consequence or contention.

An existing access gate and path is situated at present in this location. Whilst the application Site is now largely vacant under its current use as Offices (Use Class E), this footpath once served employees of the companies arriving to work by foot or by bicycle.

The proposal to upgrade this footpath was hereby approved under a previous and implemented 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

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2024.

## Travel Plan

**Consultee Comment:** It is requested that a Travel Plan is submitted for review.

It is the case that a Travel Plan was not submitted as part of the planning application. Importantly, the approved application under a previous and implemented 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 did not require a Travel Plan. The proposal represents the same hall marks and similar characteristics when considering the existing conditions of the Site. Therefore, it is considered to be both unreasonable and unjustified to require a Travel Plan for this application. Particularly, given the onerous and costly consequences that Travel Plans impose on developments. We strongly recommend for the Council to reassess their comments with the knowledge and consideration of the previously approved scheme and withdraw their request for a Travel Plan.

A Travel Plan was not submitted as there is no material change as part of this application for the use of vehicle traffic. There is an existing car park on the Site which has the capacity of 61 spaces serving the existing Offices (Use Class E) which is most busy at the standard commuting time. The commuting time for employees in offices is no different the commuting time for school drop off / pupil arrivals.

Information regarding average Arrival / Departure Time of the employees to the office is set out below.

### *Arrival / Departure Time of the Offices*

Arrival: 7:00am – 10:00am  
Departure: 4:00pm – 6:00pm

Information regarding average Arrival / Departure Time of both pupils and members of staff of the School is set out below.

### *Arrival / Departure Time of the Offices*

Pupil Arrival: 8:30am – 8:45am  
Pupil Departure: 2:45pm – 3:00pm

Staff Arrival: 7:15am – 7:55am  
Staff Departure: 3:30pm – 4:00pm

Further details are set out in the Transport Statement under Chapter 5.5.

For the avoidance of doubt the Transport Statement sets out the structure of the school day which is as follows:

8:45am	Morning Routine (Registration)
9:00am	Morning Lessons
10:30am	Break
11:00am	Lessons
12:30pm	Lunch
1:00pm	Lunch Break
1:30pm	Afternoon Lessons
2:30pm	Goodbye Routine
2:45pm	Home Time

As set out in the Transport Statement, it is the aspirations of the school once established to facilitate a Breakfast Club and After School Clubs at the following times.

Breakfast Club: 7:45am – 8:30am  
After School Club: 2:45pm – 3:30pm / 4:00pm

Should robust reasoning be presented a Travel Plan could be administered via planning conditions. It is believed the onus is on the Council to provide material evidence of why a Travel Plan is warranted given the existing use of the Site and the existing Site characteristics.

Notwithstanding the above, the information set out below provides the necessary information which would be present in a Travel Plan the future need of the Planning Condition.

*NOTE: Refer to the Diagrams on the following pages.*

## Cycle Parking

**Consultee Comment:** It is requested that a cycle-to-work scheme is implemented by the school to encourage staff cycle to work.

The proposal encourages the use of bicycles as a sustainable transport method by proposing cycle storage in line with both the expected staff and pupil numbers in line with local planning policies and those set out in the London Plan.

*NOTE: Refer to the Diagrams on the following pages.*

## School Drop Off / Supervised Collection Points & Safeguarding

The proposed school drop off / supervised collection points are critical as part of the proposal. For the reason that, children safeguarding is a fundamental component to the operation of a school. Furthermore, the school drop off / supervised collection points are a critical transfer of responsibility of the children from the parents or guardians to the school.

To ensure that this transfer is administered an appointed member of staff welcomes the pupils on arrival.

A staff member welcoming the pupils also has a secondary reason. As previously set out in the Planning Statement, the SEND school is specifically designed for pupils that suffer from autism.

For these pupils stressful and busy time periods, as well as periods of high noise levels such as the school run. Therefore, this period can be difficult for the pupils as it is not conducive to the children starting their day. In addition, children who suffer from autism require continuity and familiarity. To ensure that this process is smooth for the children and the parents / guardians this period is carefully managed by the school by providing a consistent staff member to greet the children on arrival.

Given the above, there are two proposed locations for this school drop-off / supervised collection points to take place. This was based on the principle of separation of pedestrians and cyclists being separated from vehicle traffic to ensure pedestrian and cyclists' safety.

1. **Drop off / Supervised Collection Point 1:** Primary use for pupils arriving as pedestrians (foot) or by bicycle. Shown as **Orange** circle in the diagram on the following page.  
**Location:** Located at the walk through (link) located between The Lodge and The Annex arriving from the northwestern corner of the site.
2. **Drop off / Supervised Collection Point 2 (existing):** Primary use for pupils arriving by minibus. Shown as **Yellow** circle in the diagram on the following page.  
**Location:** Located outside Aviation House (existing drop off / supervised collection point). Minibus arrival through the vehicle access in the northeast corner of the site.

The minibus drop off / supervised collection point at Aviation House as described above is an existing location and arrangement arising from the 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. Therefore, this introduction is not a newly proposed arrangement for consideration by the Council.

The reasoning for the above arrangement for minibus drop off at Aviation House was due to the tall fence line and gated access (labelled and shown as a thick black line below). It was considered from the outset that this tall fence and gate will ensure the safety of the children of from school staff or visitors arriving by car in the car park. This gated access also provides greater levels of visual and distance separation to ensure the children with autism feel comfortable away from the potentially busy and noisy car park. Furthermore, should in the rare instance a child enters an episode of panic their capacity to enter into the car park and this potentially risky time is limited.

The minibus drop off / supervised collection point has also been carefully designed to operate in a looped arrangement to ensure that the minibus can exit from the drop off in forward gear. This is particularly important where the minibus collection is administered by a private bus company.

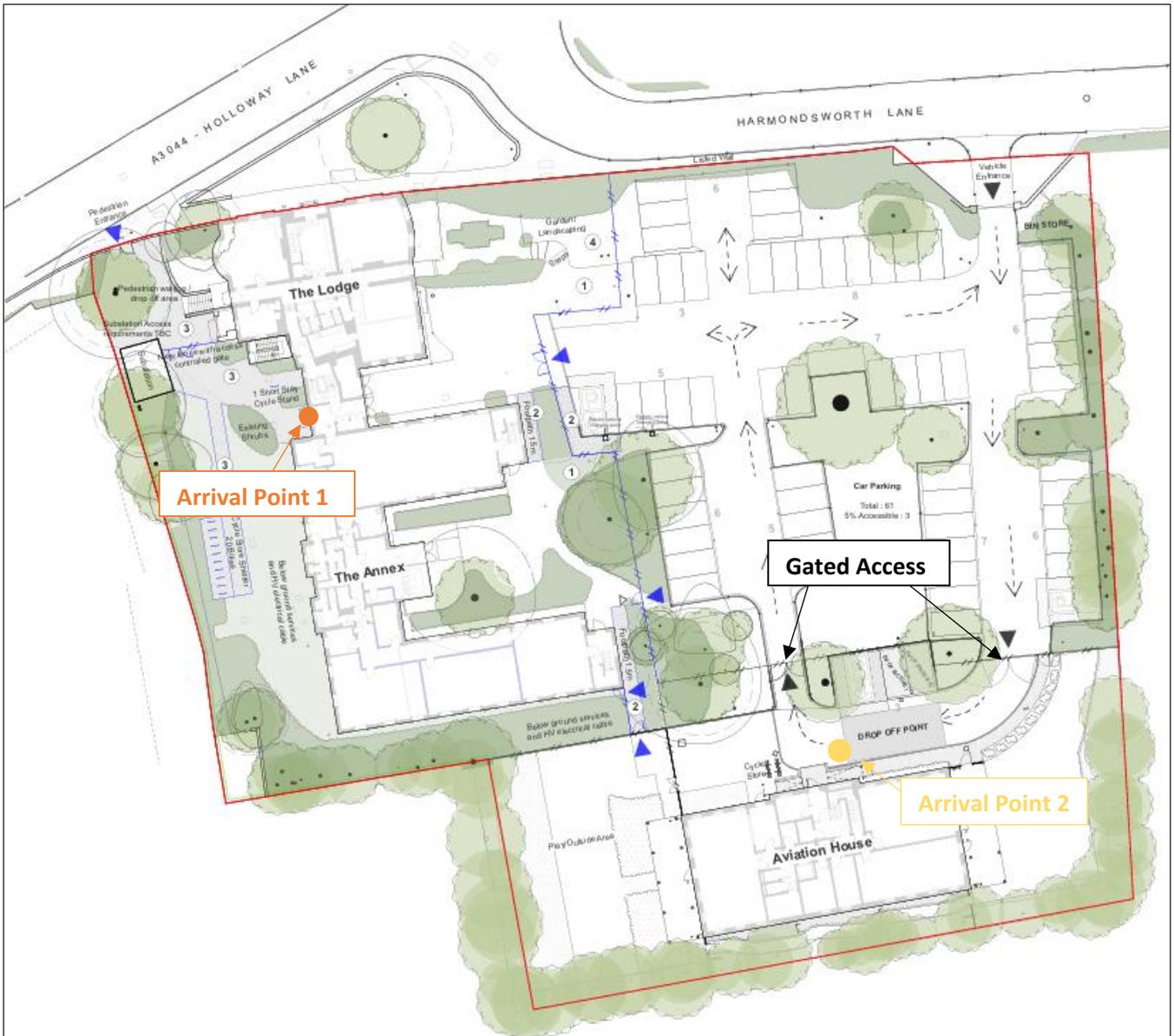
The minibus drop off / supervised collection point has also been designed with separation from the car park to provide a safe space where the children can exit the minibus at any given pace without the minibus causing traffic to build up into the car park and onto the road network (Harmondsworth Lane).

As set out in the Transport Statement in Chapter 5.4, all children will arrive by organized school minibus and taxi organized through the London Borough of Hillingdon Council "Travel

Assistance". It is the expectation of the school that pupils will predominantly arrive by minibuses with low levels of taxi travel.

It is expected that the large majority of staff will travel to the site by public transport. However, it is noted that there is large capacity of existing car parking for the existing offices. Therefore, there will be no expected increase of people traveling to the site by private car ownership.

**NOTE: Refer to the Diagrams on the following pages.**



**Above:** Diagram of Site Layout Transport Drop off.

**Source:** 745-CDA-X-ZZ-DR-A-05-0111-REV 02-Proposed Landscape Plan

## Car Parking Arrangement

**Consultee Comment:** There is an objection based on the proposed car parking arrangement and provision.

The position taken by the *Transport Planning and Development Officer* is strongly opposed to by both the Transport Consultant and the Planning Agent. It is viewed that it has been viewed that the position taken disregards the existing conditions of the Site for which there is an existing car park with 61 spaces available to use by employees of the existing offices.

In combination with the above, it is also viewed that the Consultee Comments fails to acknowledge that the proposal seeks to reduce the standard number of car parking spaces to 58 car parking spaces by converting three of the existing spaces to disabled parking bays (blue badge permit holder spaces). As disabled spaces are less utilised parking spaces the proposal effectively reduces the car amount of car parking spaces and in turn private vehicle dependency. The reduction of active travel and private vehicle dependency is a clear improvement to the existing conditions and arrangement at the Site. Thus, the proposal should be supported as it is in accordance with both the strategic aspirations of the Council and the local planning policy as well as the policies set out in the London Plan.

In addition to the above, the National Planning Policy Framework (NPPF) is explicitly clear for planning decision making in relation to transport and highways matters. 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). As the application seeks to utilise the existing arrangements the proposal should not result in any concerns or concerns viewed as 'severe'.

The proposal has been carefully considered to ensure that the arrangement is safe for all users and for the general safety of the highway. Furthermore, given the 'effective' reduction of car parking spaces by the conversion of the three standard car parking spaces to disabled spaces there is a known improvement to the current existing conditions at the Site. Therefore, it cannot be argued that the residual cumulative impacts on the road network would be 'severe'.

Given the above, the Council's Consultee should reassess the comments where an improper assessment of the existing conditions has been undertaken. In turn, this should result with a withdrawal of the *Transport Planning and Development Officer's* objection. In the instance that the Officer's comments and position remain unchanged, and retains the objection made, the Case Officer of the application should proceed with the application concluding that the application is acceptable with regards to matters relating to Transport & Highway's in accordance with the NPPF.

## Concluding Summary

It is our understanding that the above details provide the *London Borough of Hillingdon Council* with the information required to reconsider the comments made by the *Transport Planning and Development Officer*, Senober Khan. Furthermore, it is believed that all of the information outlined in this document overcomes the concerns raised.

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

Yours sincerely,

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